An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Coimisiún na Meán's Broadcasting Services Strategy Consultation

ComReg Submission

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1 Introduction

1. This document sets out the Commission of Communications Regulation's (ComReg) submission in response to Coimisiún na Meán's (An Coimisiún) consultation on its Broadcasting Services Strategy (BSS).

1.1 An Coimisiún's Broadcasting Services Strategy

2. On 28 September 2026, An Coimisiún launched a public consultation on a new BSS.[1] As outlined in the BSS:

- the primary purpose of the BSS is to set out a clear direction on An Coimisiún's approach to the licensing of broadcasting (both radio and television) services and inform its licensing plans over a multi-year period;
- since the current BSS was published in 2018 the media landscape has changed significantly. Audience behaviours have evolved; new technologies and distribution methods have emerged; broadcasters increasingly operate as multiplatform media providers; and competition from global digital services has intensified; and
- the purpose of the BSS consultation is to seek views on the future direction of licensing and the related regulatory framework in Ireland.

2 ComReg's submission to An Coimisiún's draft BSS

3. ComReg welcomes the publication of An Coimisiún's draft Broadcasting Services Strategy and, in particular, its preliminary views and proposals on future radio licensing (FM and DAB+ services) and future television licensing (DTT), where ComReg has a role as outlined below.

ComReg's role in the radio spectrum licensing of radio and television broadcasting services

4. ComReg is responsible for managing Ireland's radio spectrum and ensuring its efficient management and use. This involves various activities including its planning and international co-ordination, and the licensing of spectrum rights of use to enable wireless services.

5. From a broadcasting perspective, ComReg has specific licensing obligations as set out in the Broadcasting Act 2009 (as amended) (2009 Act), including the issuing of

[1] Coimisiún na Meán Consultation Document: Broadcasting Services Strategy, published 28 September 2026.

radio spectrum licences for FM, Digital Sound Broadcasting (DSB), and Digital Terrestrial Television (DTT) where requested by either RTÉ or by An Coimisiún or both.

Future radio licensing

6. ComReg supports An Coimisiún's proposals on the future development of radio services and will facilitate the continued spectrum licensing of FM radio services in Ireland under the 2009 Act.

7. In that regard, ComReg supports An Coimisiún's proposal 4 that:

> *"An Coimisiún will consult with stakeholders with a view to developing a DAB+ Roadmap identifying pre-licensing actions and potential licensing options. An Coimisiún will ensure that any licensing options identified can be implemented incrementally, aligned with spectrum efficiency, sustainability, and market and audience demand. [ST] "*

8. ComReg will engage with An Coimisiún's proposals for the development of digital radio services and undertake to issue radio spectrum licences, as obligated under the 2009 Act, to support same while also ensuring the efficient and effective use radio spectrum.

9. In this regard, ComReg has to-date facilitated the testing and trialling of commercial digital radio services through its Test and Trial Ireland licensing framework where currently Fáilte DAB is trialling a DAB+ multiplex network offering around 30 radio services. ComReg understands that this trial, supported by An Coimisiún, provides valuable evidence regarding audience demand, broadcaster participation, coverage, and technical delivery that can inform long-term licensing considerations.

10. In that connection, ComReg intends shortly to consult on a long-term licensing framework for digital sound broadcasting multiplexes as may be requested by An Coimisiún under the 2009 Act.

Future television licensing

11. ComReg supports An Coimisiún's:

- preliminary view that *"it unlikely that market conditions will support the establishment of commercial DTT multiplex services during the BSS*"; and
- proposal 3 that it *"…will commit to undertaking a comprehensive review of DTT. This review will consider audience behaviour, technological developments, spectrum policy, distribution costs, market demand, developments in other European jurisdictions and the ongoing role of DTT in supporting universality, accessibility and resilience. [MT]".*

12. In ComReg's view, the latter is particularly important to ensure the efficient use of the radio spectrum in the 470-694 MHz frequency range (Sub-700 MHz band) because:

- currently, this valuable radio spectrum band is reserved for DTT use, including the reservation of spectrum for at least four DTT Multiplex licences as may be requested by An Coimisiún, noting also that the entry of a commercial DTT multiplex operator is unlikely to emerge; and
- there would be substantial benefits from other potential uses of the Sub-700 MHz band. For example, outside of Europe, parts of this radio spectrum band (i.e. the 600 MHz band in USA) have already been repurposed for other services, in particular mobile wireless broadband services.

13. ComReg notes that An Coimisiún's preliminary view regarding commercial DTT aligns with the key findings and recommendations of a recent study conducted by Frontier Economics on the role of DTT in Ireland and the long-term future use of the radio spectrum band used to deliver DTT services (see ComReg documents 26/69 and 26/69a) (Frontier Study).

14. The Frontier Study relied on various information sources, including the 2025 market research undertaken by Ipsos B&A which may also provide a valuable evidence base for the review to be undertaken under Proposal 3 (See ComReg document 26/69b).

15. Key findings from the Frontier Study include that:

> *"**Television consumption is increasingly moving online**, supported by expanding gigabit broadband availability and growing use of internet-based TV and streaming services."*
>
> *"**While DTT remains important in the short to medium term, its long-term role and its future use of the sub-700 MHz spectrum band will need to be considered** in light of changing consumer behaviour, technological developments, and international policy decisions, particularly from Ireland's neighbouring countries the UK and France."*

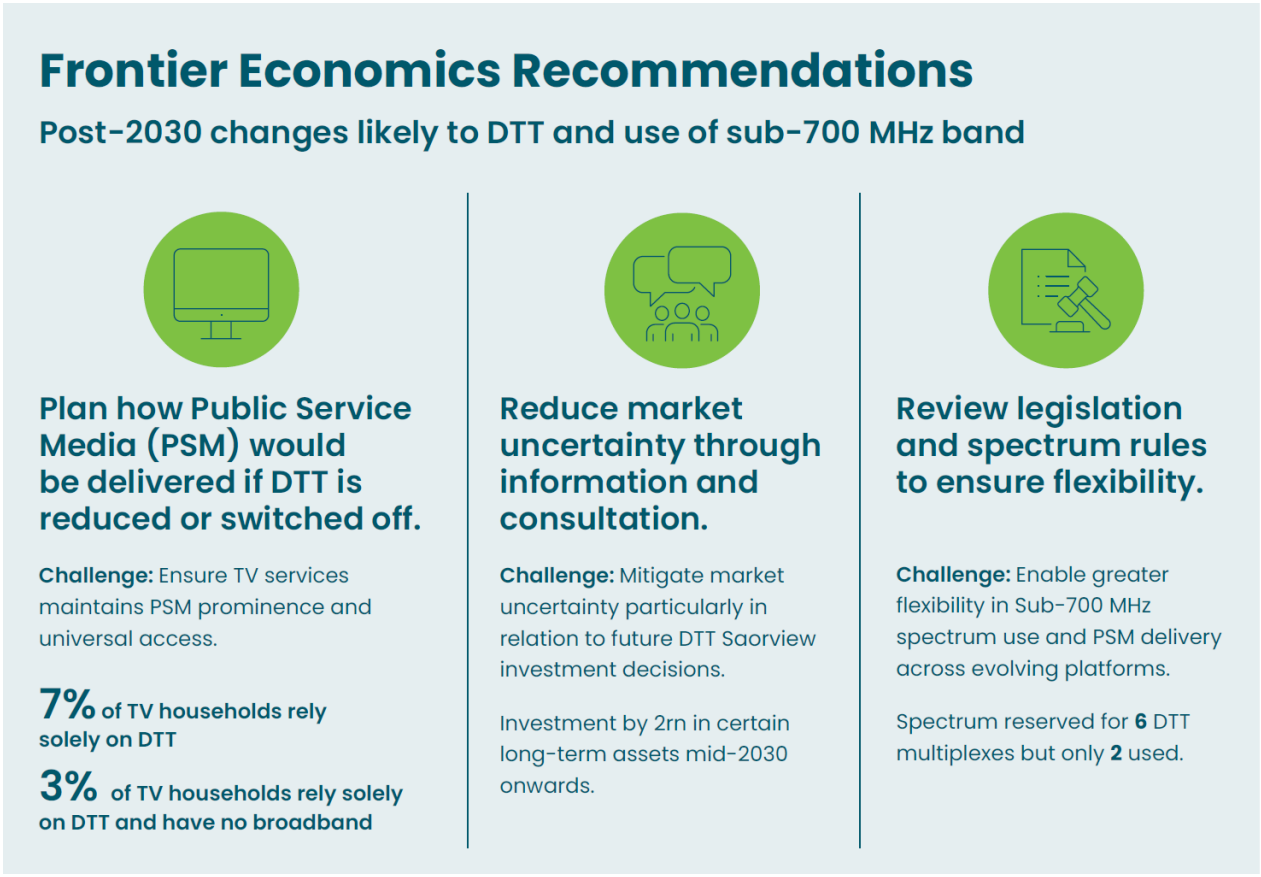
16. A summary of Frontier Economics' recommendations is set out in the figure below, with its third recommendation being that "*Ireland should consider whether the legislative and regulatory framework governing DTT, including its spectrum related provisions, would need to be amended."*

17. In support of this recommendation, Frontier Economics note that:

> *"**The legislative and regulatory framework governing DTT, including its spectrum related provisions, were largely developed two decades ago and before 2010**, at a time where consumer TV viewing habits and TV distribution capabilities and investments were considerably different to now."*
>
> *"With the increasing demand and use of internet-based TV services, and Ireland very soon having 100% gigabit network availability, which for those with a broadband subscription will offer greater capacity,*

functionality and quality of TV services than is possible on DTT, it ***seems prudent for Ireland to review and consider amending DTT obligations to provide for greater flexibility to stakeholders****."*

For ***ComReg, this primarily relates to the obligation requiring it to reserve the whole of the sub-700 MHz band for DTT and PMSE use****, irrespective of whether the spectrum is then used to provide TV services or not and whether* ***there are benefits to be gained from other potential uses for that spectrum****. For example, outside of Europe, parts of this radio spectrum band (i.e. the 600 MHz band in USA) have already been repurposed for other services, in particular mobile wireless broadband services.".*



Development of a future regulatory framework

18. In light of the above, ComReg also supports An Coimisiún's Proposal 1 that it,*"…will identify and consult on specific measures that may modernise, streamline or future-proof the broadcasting regulatory framework, including any measures requiring legislative reform. [MT - LT]".*

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