



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Returned spectrum in the 3.6 GHz Band

Information Notice

Information Notice

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Content

Section	Page
1 Returned spectrum in the 3.6 GHz band	3
1.1 Potential demand for the Returned Spectrum (October 2025)	3
1.2 Spectrum transfers (December 2025 – May 2026).....	4
1.3 Reconsideration of this work item (June 2026).....	5
1.4 Next Steps.....	7

1 Returned spectrum in the 3.6 GHz band

1.1 This document provides updated information on the Commission for Communications Regulation’s (“ComReg”) plans¹ to consider a potential award process to assign some or all of the available spectrum rights in the 3400 to 3800 MHz frequency range (the “3.6 GHz Band”) surrendered by Dense Air Ireland Limited (“Dense Air”) in July 2024 consisting of:

- 25 MHz available nationally in the 3410-3435 MHz frequency range (the “A-Lot”); and
- 35 MHz available in five urban regions in the 3580 – 3615 MHz frequency range (the “B-Lots”),

(together the “Returned Spectrum” - see figure below).

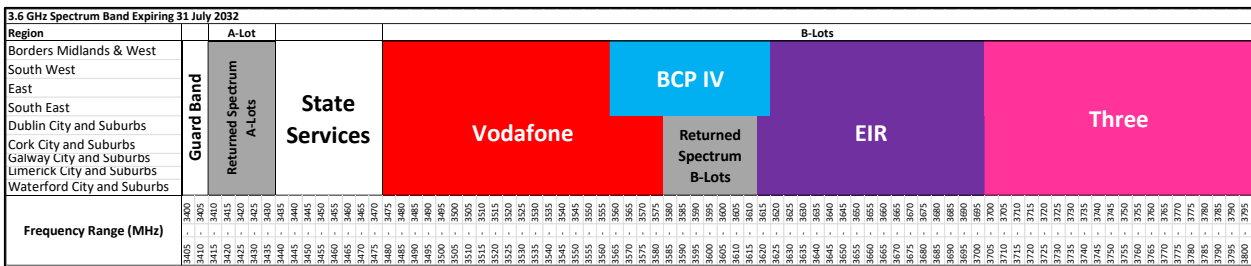


Figure 1: Spectrum assignments in the 3.6 GHz Band as at December 2025

1.1 Potential demand for the Returned Spectrum (October 2025)

1.2 In October 2025, ComReg wrote to the following licensees and spectrum lease licensees in the 3.6 GHz Band to gather their views including potential demand for some or all of the Returned Spectrum:

- BCP IV Telecommunications Opco Limited (“BCP IV”);
- Eircom Limited (“Eir”);

¹ See for example:

- Paragraph 4.4 bullet (vii) of ComReg Document [24/99a](#) “Radio Spectrum Management Operating Plan for 2025 – 2028”, published 13 December 2024 where ComReg indicated that it planned to “consult in 2025 on the potential assignment of available spectrum rights in the 3.6 GHz band”; and
- ComReg’s Public Action Plan for the year ended 30.06.26 - https://www.comreg.ie/media/2026/06/Annual-Public-Action-Plan-Ye-30.06.26_Update-at-June-3-2026.pdf

- Three Ireland (Hutchison) Limited (“Three”);
- Vodafone Ireland Limited (“Vodafone”); and
- Imagine Network Services Limited (“Imagine”)

1.3 The responses suggested that, while there could be potential demand for some or all of the Returned Spectrum (dependent on the conditions under which it would be made available), the extent of any demand was also contingent on the future of BCP IV’s spectrum rights, noting that:

- in October 2025, BCP IV was exploring a sale (i.e. transfer) of its spectrum rights; and
- the potential sale or return of some or all of BCP IV’s spectrum rights in the 3.6 GHz Band could result in national² spectrum rights becoming available which could influence potential demand.

1.2 Spectrum transfers (December 2025 – May 2026)

1.4 In December 2025³ and January 2026⁴, ComReg received notifications of two proposed spectrum transfers which, if approved, would amend the spectrum holdings of BCP IV, Eir and Vodafone, and would result in a 100 MHz contiguous frequency assignment nationally for both Eir (in the 2.3 GHz Band) and Vodafone (in the 3.6 GHz Band).

1.5 As the proposed spectrum transfers could materially impact potential demand for the Returned Spectrum, ComReg paused its consideration of a potential award process for the Returned Spectrum.

1.6 ComReg subsequently determined that both proposed spectrum transfers could be put into effect, with:

- the determination for the proposed transfer of 40 MHz spectrum in the 2.3 GHz band nationally to Eir issued on 2 April 2026⁵; and

² The frequency range of the Returned Spectrum B-Lots (i.e. 3580 MHz to 3615 MHz) for the 5 urban regions overlaps with BCP IV’s spectrum rights for the four non-urban areas, meaning that together national spectrum rights could become available.

³ ComReg [25/04](#), “*Notice of proposed Spectrum Transfer - Proposed transfer of spectrum rights in the 2.3 GHz band from BCP IV Telecommunications OPCO Limited to Eircom Limited*”, published 19 December 2025.

⁴ ComReg [26/04](#), “*Notice of proposed Spectrum Transfer - Proposed transfer of spectrum rights in the 3.6 GHz band from BCP IV Telecommunications OPCO Limited to Vodafone Limited*”, published 23 January 2026

⁵ ComReg [26/26](#), “*Spectrum Transfer Determination: Proposed transfer of 2.3 GHz Band spectrum rights of use from BCP IV Telecommunications OPCO Limited (formerly Imagine Communications Ireland Limited) to Eircom Limited*”, published 2 April 2026.

- the determination for the proposed transfer 15 MHz spectrum in the 3.6 GHz band in the four non-urban regions to Vodafone issued on 14 May 2026⁶.

1.7 Following notification from the respective notifying parties, the relevant licences were amended, issued and withdrawn (as appropriate) to put the spectrum transfers into effect, with:

- the spectrum transfer between BCP IV and Eir having an effective date of 8 April 2026⁷; and
- the spectrum transfer between BCP IV and Vodafone having an effective date of 28 May 2026⁸.

1.8 The updated band plan for the 3.6 GHz Band as at June 2026 is set out in the figure below.

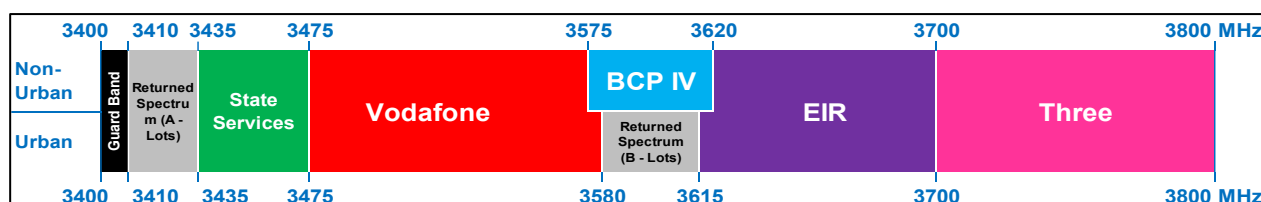


Figure 2: Spectrum assignments in the 3.6 GHz Band as at June 2026

1.3 Reconsideration of this work item (June 2026)

1.9 ComReg sets out below some observations relevant to its reconsideration of this work item, including the changed market circumstances in light of the two recent spectrum transfers.

(i) Eir and Vodafone now have a 100 MHz contiguous spectrum assignment nationally

1.10 Both Eir's and Vodafone's spectrum assignments have increased such that all of the mobile network operators ('MNO') (i.e. Eir, Three and Vodafone) have a 100

⁶ ComReg [26/31](#), "Spectrum Transfer Determination - Proposed transfer of 3.6 GHz Band spectrum rights of use from BCP IV Telecommunications OPCO Limited (formerly Imagine Communications Ireland Limited) to Vodafone Ireland Limited", published 14 May 2026.

⁷ With an effective date of 8 April 2026 an amended MBSA2 Liberalised Use Licence (LU1006) was issued to Eircom Limited and the MBSA2 Liberalised Use Licence (LU1005) of BCP IV was withdrawn.

⁸ With an effective date of 28 May 2026, an amended 3.6 GHz Band Liberalised Use Licence (3L1002) was issued to Vodafone, and an amended 3.6 GHz Band Liberalised Use Licence (3L1004) was issued to BCP IV. Additionally, to reflect the spectrum transfer in the existing spectrum lease with Imagine Networks Services Limited (Imagine), an amended 3.6 GHz Band Liberalised Use Spectrum Lease Licence (SL1017) and a new 3.6 GHz Band Liberalised Use Spectrum Lease Licence (SL1018) was issued to Imagine.

MHz contiguous block of spectrum nationally in a mid-range spectrum band - with Eir's 100 MHz assignment being in the 2300 - 2400 MHz frequency range (the 2.3 GHz band)⁹, and Vodafone's and Three's respective 100 MHz assignment being in the 3.6 GHz Band.

- 1.11 A 100 MHz contiguous spectrum assignment is beneficial to MNOs because, in the case of the sub-6 GHz spectrum bands, it is the largest 5G channel bandwidth. This improves the performance of 5G and facilitates higher peak throughput speeds, lower end-to-end latency and greater spectral efficiency.
- 1.12 As a result, ComReg observes that potential demand for the Returned Spectrum may have materially changed since October 2025.

(ii) Uncertainty regarding BCP IV's spectrum rights

- 1.13 The future of BCP IV's remaining 45 MHz of spectrum rights in the 3.6 GHz Band is uncertain, noting that:
- BCP IV's spectrum lease with Imagine expires on 4 November 2026, just over 4 months from now; and
 - BCP IV has previously engaged in a broad market engagement process to sell its spectrum rights, presumably including the 45 MHz of spectrum rights it still holds.
- 1.14 Consequently, there may be further changes to BCP IV's spectrum rights, which could in turn impact on any potential demand for the Returned Spectrum and further complicate and/or delay the original workstream.

(iii) Reduced timeframe for any potential assignment

- 1.15 Originally, ComReg anticipated that any spectrum assignment process for the Returned Spectrum would have been completed in 2026, meaning a period of about 5½ years (e.g. from end-2026 to mid-2032) during which a licensee/s could benefit from the use of any spectrum rights assigned.
- 1.16 ComReg observes, however, that the prevailing circumstances have rendered that initial expectation highly improbable. Based on an estimated period of 1½ years to deal with any further changes to BCP IV's spectrum rights, reconsider demand, develop, consult upon and implement an award process, this suggests a reduced assignment period of about 4 years (e.g. from end-2027 to mid-2032) at best.

⁹ Of this spectrum ComReg observes that 10 MHz is a restricted block that can only operate 23 dB down from the remaining 90 MHz in the 2.3 GHz band.

(iv) Other 3.6 GHz Band considerations

- 1.17 With the expiry of the 3.6 GHz Band licences approaching, ComReg observes that its consideration of the long-term future of the 3.6 GHz band is likely to be under consultation¹⁰ within the next year.

1.4 Next Steps

- 1.18 Considering:
- (a) the changed market circumstances following the recent spectrum transfers, whereby all three MNOs now have a 100 MHz contiguous block of spectrum nationally in a mid-range spectrum band, thereby facilitating higher peak throughput speeds and lower end-to-end latency to the benefit of users;
 - (b) the relatively small amount of Returned Spectrum available - 60 MHz consisting of the 25 MHz A-Lot and 35 MHz of B-Lots;
 - (c) the non-contiguous nature of the Returned Spectrum, where the A-Lot is separate to the B-Lots;
 - (d) the non-national nature of the B-Lots, where these are only available in the five urban regions;
 - (e) the continued uncertainty over the future of BCP IV's spectrum rights in the 3.6 GHz Band;
 - (f) the time required to develop, consult upon and implement an assignment process (with no certainty that any spectrum rights would ultimately be assigned); and
 - (g) the resulting short duration of any rights granted,

ComReg considers, on balance, that it would be more beneficial and preferable to focus on the long-term future/assignment of the 3.6 GHz Band – alongside its consideration of the future of the 800 MHz, 900 MHz and 1800 MHz bands (rights to which expire in July 2030) (“MBSA3”) – rather than the short-term assignment of the relatively small amount of Returned Spectrum.

- 1.19 Nevertheless, should any interested party consider that ComReg ought to instead focus upon developing an assignment process for the short-term rights to the Returned Spectrum, a reasoned request may be submitted to ComReg. Such

¹⁰ Such consultation would be in the context of ComReg's third multi-band spectrum award (MBSA3) which among other things would seek to address the expiry of MBSA1 licences in July 2030 and 3.6 GHz band liberalised use licences in July 2032.

submissions should be clearly marked:- “Reference: Information Notice 26/46
“Returned Spectrum in the 3.6 GHz Band”, and be sent by e-mail to:

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