

Dear Group members,

Sanoma is the leading Finnish Media company and the leading European learning company (www.sanoma.com).

In Finland Sanoma is the No. 2 commercial national TV Broadcaster. We operate four (4) commercial free-to-air TV channels. Half of the Finnish viewers are in Cable TV networks and the other half receive TV via the terrestrial network. In addition to these in total about 2 million TV households, there is some 600.000 cottages, caravans and boats relying on the digital terrestrial TV distribution.

Our two key comments are:

- 1) The weight of terrestrial TV distribution, and therefore need of frequencies vary a lot among the member states. In Finland more than half (50% of households + 600.000 cottages) of all TV reception is done via terrestrial. Therefore, it is essential, that any decisions regarding use of TV frequencies (470 – 700 MHz) are done on a **national level** (not on a EU level)
- 2) In Finland it is highly likely, that there will still be need for terrestrial TV distribution also beyond 2030. Therefore the 470 - 700 Mhz band should primarily be allocated and reserved for TV distribution, but as it eventually become free, it should be possible to flexibly utilize all, or some of the frequencies, for eg. 5G. Even in this case, some obligations should be in place and enforced for Telco's ta also in the 5G band, and with relevant technology, carry national TV channels.

Sanoma Media Finland Oy

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