Radio Spectrum Policy Group – RSPG
CNECT-RSPG@ec.europa.eu

Response from Yle to the public consultation on the Draft RSPG Opinion on spectrum related aspects for next-generation wireless systems (5G)

Yle welcomes the opportunity to provide comments on the draft RSPG Opinion on spectrum related aspects for next-generation wireless systems (5G).

1. Facts about Yle

Yle (Yleisradio, Finnish Broadcasting Company) is Finland's national public service media company. Yle operates four national television channels, six FM radio channels and the most extensive online selection of television and radio programmes in the country as well as other online services. Yle's web-tv-service Areena is the most popular domestic web-tv-service. Yle reaches everyone in Finland, 91 per cent of population every week.

2. Yle's views on 5G radio spectrum

Yle considers that

1) low UHF frequencies are needed for 5G-networks in order to serve fully country-wide also sparsely populated countries like Finland. For this reason Yle suggests that **700 MHz band** should be harmonised for 5G in Europe.

2) **Sub-700 i.e. 470-694 MHz band** need to be primarily reserved for downlink delivery of audiovisual media content, including tv-channels. EU regulation should allow Member States to flexibly use either digital tv-technology or 3GPP LTE Broadcasting (eMBMS) technology or both, just like the Article 4 in draft EU UHF decision proposes. Yle suggests that 470-694 MHz band should be allocated for **5G downlink only av-media content delivery** (SDL, supplemental downlink) on alternative (co-primary) basis so that also digital broadcasting tv-technology can be used on same band.

Yours faithfully

Yle – Finnish Broadcasting Company

Janne Holopainen
Media Regulation Manager