

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	)	
	)	
Authorizing Permissive Use of the 3GPP	)	MB Docket No. 26-263
5G Broadcast Transmission Standard for	)	
Low Power Television Stations Under	)	
Part 74 of the Commission's Rules	)	

**COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION

The National Association of Broadcasters (NAB)¹ submits these comments in opposition to the above-captioned Petition for Rulemaking (Petition), filed by XGN/X1 Mobile and Tyche Media LLC (collectively, "Petitioners").² The Commission should not authorize individual television stations to abandon the established U.S. television transmission standards in favor of a standalone, incompatible standard absent a compelling public interest justification, which Petitioners have not provided.

¹ The National Association of Broadcasters is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Authorizing Permissive Use of the 3GPP 5G Broadcast Transmission Standard for Low Power Television Stations Under Part 74 of the Commission's Rules*, MB Docket 26-263, Petition for Rulemaking of XGN / X1 Mobile and Tyche Media LLC (filed Aug. 10, 2026); see also Public Notice, DA 26-1000 (Sept. 17, 2026).

This is not the first proposal the Commission has considered to authorize 5G Broadcast as an alternative transmission standard for LPTV stations. NAB opposed an earlier petition³ by HC2 Broadcast Holdings, which would have permitted LPTV stations to abandon entirely providing television programming to the public in favor of offering a data service using the 5G Broadcast standard. Petitioners have at least addressed the most fundamental shortcoming: unlike the earlier proposal, this one would require television stations to continue providing television programming to the public. That improvement, however, does not answer the more fundamental question presented here: why should the Commission introduce a second, incompatible transmission standard into the U.S. television ecosystem in the midst of the ongoing transition to ATSC 3.0?

There is no compelling answer offered by the Petitioners. ATSC 3.0 is already deployed in many markets, reaching more than 75 percent of the U.S. population, and is supported by a growing receiver and service ecosystem. ATSC 3.0 is also increasingly being used for applications extending beyond traditional linear television. The prospective European mobile device ecosystem on which Petitioners rely does not translate readily to U.S. television spectrum. And, the innovative and public safety applications Petitioners identify are already being developed and deployed using ATSC 3.0. While 5G Broadcast experimentation can proceed under temporary or experimental authority without abandoning the common U.S.

³ See *Authorizing Permissive Use of 5G Broadcast as a Transmission Standard for Low Power Television Stations*, MB Docket 25-168, Petition for Rulemaking of HC2 Broadcast Holdings Inc. (filed March 28, 2025).

television transmission standard, the Commission should decline to initiate the requested rulemaking.

II. THE COMMISSION SHOULD NOT FRAGMENT THE U.S. TELEVISION ECOSYSTEM WITH A SECOND TRANSMISSION STANDARD

The United States is well into a transition from ATSC 1.0 to ATSC 3.0, with ATSC 3.0 transmissions on the air in all the nation's largest 25 markets and 48 of the top 50 markets, reaching more than 75% of the U.S. population. Broadcasters have invested substantially in ATSC 3.0 transmission facilities; consumer electronics manufacturers have deployed and sold millions of compatible television receivers; and an expanding ecosystem of broadcasters, equipment manufacturers, application developers, and public safety partners is developing new services around that standard. ATSC 3.0 has also expanded internationally, including in Brazil, India, South Korea, and several Caribbean nations.⁴

But completing this transition depends on scale and coordination. A broadcast transmission standard is not simply a technical preference exercised independently by each television station licensee. Receiver manufacturers, semiconductor companies, application developers, MVPDs, public safety agencies, and consumers must make complementary investments to realize its benefits. Allowing a subset of broadcasters to choose an incompatible standard would undermine those coordinated investments.

NAB raised precisely this concern in response to the earlier HC2 proposal to authorize 5G Broadcast for LPTV stations. As NAB explained there, authorizing a competing,

⁴ Tom Butts, *ATSC Celebrates 3.0's Global Expansion*, TV Tech (Apr. 21, 2026), <https://www.tvtechnology.com/events/atsc-celebrates-3-0s-global-expansion>.

incompatible standard risks creating marketplace uncertainty and dividing the investment necessary to establish a successful receiver and service ecosystem.⁵ Nothing in the present Petition resolves that concern. To the contrary, Petitioners expressly propose that LPTV stations be permitted to use 5G Broadcast in lieu of ATSC 1.0 or ATSC 3.0, creating exactly the fractured marketplace that NAB believes will slow or derail the ongoing transition.

III. PETITIONERS' CLAIMED GLOBAL RECEIVER ECOSYSTEM DOES NOT SUPPORT AUTHORIZATION OF STANDALONE 5G BROADCAST IN THE UNITED STATES

A central premise of the Petition is that 5G Broadcast's origins in the global 3GPP ecosystem would provide LPTV stations access to a vast market of mobile devices. Petitioners characterize 5G Broadcast as a "single, worldwide standard" and assert that compatible devices could receive emergency information across national borders without "country-specific hardware or software adaptations."⁶ They point to particular plans for 5G Broadcast deployment in France and assert that commercial smartphones with native 5G Broadcast reception are expected to become available in Europe beginning in 2027.

That argument fails for two reasons. First, that argument conflates a worldwide technical standard with a worldwide receiver ecosystem. A global standard is not the same thing as a global receiver. That distinction is particularly important in the U.S. because the European receiver developments on which Petitioners rely upon involve different spectrum from the spectrum available to U.S. television stations. 3GPP has defined Band 112 to cover 470-608 MHz – the frequencies relevant to U.S. television broadcasting – and Band 113 to

⁵ Comments of NAB, MB Docket No. 25-168 (June 2, 2025).

⁶ Petition at 3.

cover 606-698 MHz – the band contemplated for European 5G Broadcast reception.⁷ Band 113, notably, corresponds to the “600 MHz” band of spectrum that the United States has already cleared of television broadcasting and repurposed for mobile broadband service.

Petitioners’ own materials recognize this distinction. XGN’s proposed 5G Broadcast receiver profile calls for support for Bands 112 and 113 but separately specifies antennas optimized for “either band 112 (US and India) or 113 (Europe).” Thus, even assuming manufacturers begin selling Band 113-capable smartphones in Europe on the schedule Petitioners anticipate, nothing in the Petition demonstrates that those devices will support Band 112 reception in the United States. European handset development therefore does not establish the imminent arrival of a receiver ecosystem on which Petitioners’ proposal depends.

Second, France is a poor precedent for the regulatory action Petitioners seek here. France is undertaking substantial development of 5G Broadcast, but French network operator TDF continues to describe its 2026 activity as a large-scale experiment intended to test uses, technical performance, and real-world reception *before* broader deployment.⁸ More importantly, TDF describes 5G Broadcast as an *additional* reception mode for France’s

⁷ XGN Global, LLC, *5G Broadcast Receiver Standards*, <https://www.xgnglobal.com/receiver-standards-for-5g-broadcast>.

⁸ TDF, *5G Broadcast, Où*, <https://www.tdf.fr/en/5g-broadcast-ou>.

existing terrestrial television platform, particularly for mobile reception, that complements conventional terrestrial television reception in the home.⁹

Petitioners thus invoke France as evidence for a regulatory model France itself has not adopted and a receiver ecosystem that does not necessarily translate to U.S. spectrum. To the extent proponents ultimately seek to incorporate Band 112 reception into U.S. devices, the broader full-power ATSC 3.0 ecosystem offers fundamentally different potential scale than a collection of individual LPTV stations operating a standalone transmission standard. Moreover, ATSC 3.0 and 5G Broadcast need not be mutually exclusive: recent revisions to ATSC A/327¹⁰ and the Castanet¹¹ deployment demonstrate that 5G Broadcast can coexist with ATSC 3.0 rather than requiring broadcasters to abandon the common ATSC platform. That approach is far more analogous to the complementary model being explored in France.

IV. THE INNOVATION AND PUBLIC SAFETY BENEFITS PETITIONERS IDENTIFY DO NOT REQUIRE A SECOND STANDALONE BROADCAST STANDARD

Petitioners place particular emphasis on the potential use of 5G Broadcast for emergency alerting and first responder communications. NAB strongly agrees that broadcast spectrum and infrastructure can provide unique and important public safety capabilities. But

⁹ TDF, *5G Broadcast for TV in France: Technical, Economic and Regulatory Modalities* (Aug. 2025), <https://www.tdf.fr/wp-content/uploads/2025/09/5G-Broadcast-White-paper-VF-2025-08-25.pdf>.

¹⁰ ATSC, *ATSC Recommended Practice; A/327:2025-07 Amendment No. 1, "TDM of ATSC with Other Broadcasting Systems"* (March 9, 2026), <https://www.atsc.org/wp-content/uploads/2026/03/A327-2025-07-Amend-No-1.pdf>.

¹¹ George Winslow, *Castanet Launches Hybrid ATSC 3.0 and 5G Broadcast Internet Pilot Network in Vegas*, TV Tech (April 20, 2026), <https://www.tvtechnology.com/platform/broadcast/castanet-launches-hybrid-atsc-3-0-and-5g-broadcast-internet-pilot-network-in-vegas>.

that is not a reason to introduce an incompatible transmission standard; public safety agencies and broadcasters are *already* developing and deploying precisely those kinds of capabilities using ATSC 3.0.

For example, SpectraRep has used ATSC 3.0 datacasting during the Marine Corps Marathon and other large-scale events to allow local and federal public safety agencies to share encrypted streaming video, targeted alerts, files, and other operational information over-the-air without relying on Internet or LTE connectivity.¹² Public broadcasters and emergency management authorities are likewise already building ATSC 3.0 into their public safety infrastructure. PBS North Carolina and its technology partners have developed digital paging over ATSC 3.0 for first responders.¹³ North Carolina has also received FEMA funding for ATSC datacasting of authenticated IPAWS/EAS over an independent over-the-air pathway, including ATSC 3.0 Advanced Emergency Information capable of delivering evacuation routes, shelter locations, multilingual instructions, and situational guidance.¹⁴

These are not theoretical capabilities. Public safety agencies are already investing in receivers, applications, and operational workflows that use existing television broadcast infrastructure. Fragmentation does not benefit public safety any more than it benefits

¹² See SpectraRep, *SpectraRep Deploys NextGen Broadcast Emergency Communications Datacast*, <https://spectrarep.com/spectrarep-deploys-nextgen-broadcast-emergency-communications-datacast/>; SpectraRep, *Equipping First Responders at the Incident Scene with Real-Time Information* <https://www.spectrarep.com/incidentone/>.

¹³ Comments of North Carolina Emergency Management *et al*, GN Docket No. 16-142 (Jan. 15, 2026).

¹⁴ Reply Comments of North Carolina Emergency Management *et al*, GN Docket No. 16-142 (Feb. 18, 2026).

television viewers. Public safety depends on scale, interoperability, and ubiquity. Dividing broadcast-based public safety applications between incompatible ATSC 3.0 and standalone 5G Broadcast facilities would not expand a common public safety infrastructure; it would create another network requiring different reception capabilities to access and could complicate public safety organizations' efforts to get information out to the public.

The Petition's proposed public safety conditions are also poorly defined. Petitioners would require stations to devote an average of 50 percent of their remaining "transmission capacity" to public safety, but "in no event" less than "2 MHz" of bandwidth.¹⁵ They do not explain how the bandwidth requirement relates to the capacity requirement, over what period the required average would be calculated, or how compliance would be measured. These ambiguities further undermine Petitioners' reliance on this commitment to justify use of an alternative transmission standard.

V. CONCLUSION

ATSC 3.0 is an established and increasingly capable platform for the future of U.S. television broadcasting. Petitioners have not demonstrated that authorizing a second, incompatible television transmission standard would serve the public interest. Their claimed global receiver ecosystem does not support the proposed U.S. deployment model, and the innovation and public safety benefits they identify do not require use of a standalone 5G Broadcast standard. Introducing such a standard would instead fragment the investments

¹⁵ Petition at 5.

and ecosystem supporting the ongoing transition to ATSC 3.0. The Commission should deny the Petition.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

1 M St. SE
Washington, DC 20003
(202) 429-5430

A handwritten signature in dark ink, appearing to read 'Rick Kaplan', with a long horizontal line extending to the right.

Rick Kaplan
Nandu Machiraju
Alison Martin
Robert Weller

October 19, 2026