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	)	

REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF BROADCASTERS

I. INTRODUCTION

The National Association of Broadcasters (NAB)[1] submits these reply comments in opposition to the above-captioned Petition for Rulemaking (Petition), filed by XGN/X1 Mobile and Tyche Media LLC (collectively, "Petitioners").[2] As NAB explained in its initial comments, authorizing low power television (LPTV) stations to employ a standalone 5G Broadcast transmission standard would introduce unnecessary and harmful fragmentation into the U.S. television ecosystem at a critical point in the ongoing transition to ATSC 3.0. The Petition

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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).

offers no compelling public interest justification for that result, and nothing in the comments alters that conclusion.

The comments in the record reinforce NAB's concerns in two important respects. First, the record reveals substantial disagreement even among proponents of 5G Broadcast about how the technology should be deployed and what public interest obligations should accompany its use. Second, at least one commenter has identified significant technical questions that Petitioners have not adequately addressed. For both reasons, in addition to the reasons stated in NAB's initial comments, the Commission should deny the Petition.

II. THE RECORD REVEALS SUBSTANTIAL DISAGREEMENT AMONG 5G BROADCAST PROPONENTS AND CONFIRMS THE RISKS OF FRAGMENTING THE TELEVISION ECOSYSTEM

Although several commenters express general support for authorizing 5G Broadcast, their filings reveal fundamental disagreements about what such authorization should entail. These differences are not trivial either; indeed, they concern the very public interest commitments that Petitioners invoke to distinguish the proposal from earlier requests to authorize standalone 5G Broadcast operations.

Petitioners propose to require stations to reserve substantial transmission capacity for public safety applications. Yet several proponents of 5G Broadcast expressly oppose such a requirement. Milachi Media argues that mandatory public safety capacity reservations would impose unusual and economically burdensome obligations on secondary LPTV stations.[3] HC2

[3] Comments of Milachi Media, MB Docket No. 26-263 at 5-6 (Oct. 19, 2026) (Milachi Comments).

Broadcast Holdings (HC2) urges the Commission to authorize 5G Broadcast without artificial bandwidth constraints.[4] Lowcountry 34 Media similarly opposes additional operating mandates.[5] Castanet 5G LLC (Castanet), which is itself developing 5G Broadcast services, questions the practicality of requiring broadcasters to reserve capacity for public safety applications without any assurance that public safety agencies will use that capacity.[6]

This disagreement goes to the heart of the Petition. Petitioners rely heavily on their proposed public safety commitment to establish that authorizing a new transmission standard would serve the public interest. Yet a substantial portion of the community advocating for 5G Broadcast does not support those commitments.

The comments reveal similar disagreements concerning the provision of traditional television programming. Petitioners propose requiring at least one free-to-air programming stream at a minimum resolution of 720p. HC2 and Lowcountry 34 advocate retaining existing free programming obligations without additional restrictions.[7] One Ministries, Inc. (OMI) raises separate concerns about Petitioners' proposed restrictions on stations with must-carry rights, arguing that they would disadvantage those stations and their viewers.[8] Thus, proponents

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4 Comments of HC2 Broadcast Holdings LLC, MB Docket No. 26-263 at 3 (Oct. 19, 2026) (HC2 Comments).

5 Comments of Lowcountry 34 Media, LLC, MB Docket No. 26-263 at 3 (Oct. 19, 2026) (Lowcountry 34 Comments).

6 Comments of Castanet 5G LLC, MB Docket No. 26-263 at 5, n. 5. (Oct. 19, 2026) (Castanet Comments).

7 HC2 Comments at 3; Lowcountry 34 Comments at 3.

8 Comments of One Ministries, Inc., MB Docket No. 26-263 at 1 (Oct. 8, 2026) (OMI Comments).

have not reached agreement even on the basic television service obligations that should accompany standalone 5G Broadcast operations.

Taken together, these disagreements among 5G Broadcast proponents reveal a fundamental problem with the Petition. The Commission is being asked to authorize a new television transmission standard without any meaningful agreement about what programming stations would provide, what public safety services they would offer, or whether consumers would have the equipment necessary to receive either. As NAB explained in its initial comments, proponents have not demonstrated that the emerging 5G broadcast receiver ecosystem will support the frequencies used for television broadcasting in the United States. The result is a proposal that would introduce a new, incompatible transmission standard without establishing what services would be delivered over it or who would be able to receive them.

As the ongoing ATSC 3.0 transition demonstrates, realizing the benefits of a new transmission standard requires coordinated investment by broadcasters, equipment suppliers, consumer electronics manufacturers, and numerous other stakeholders. Achieving that coordination is challenging enough when the industry is working toward a common standard. Allowing individual licensees to pursue incompatible transmission standards would further fragment these efforts, dilute incentives to invest, and make it less likely that new capabilities will reach consumers at scale. Far from accelerating innovation, the proliferation of competing standards risks undermining the very consumer benefits that innovation is seeking to deliver.

NAB does not suggest that technological development must proceed along a single path or that every stakeholder must agree on every implementation detail. Experimentation and innovation should continue. But there is a fundamental difference between developing new capabilities within a common, highly capable and expandable television ecosystem and authorizing incompatible transmission standards that divide the investments necessary to bring those capabilities to the public. The Petition would do the latter, without demonstrating public interest benefits sufficient to justify that disruption.

III. THE TECHNICAL RECORD DOES NOT SUPPORT THE REQUESTED AUTHORIZATION

Several proponents cite experimental operations and the absence of reported interference complaints as evidence that standalone 5G Broadcast can be authorized under existing technical rules. As Sinclair explains in its comments, however, the absence of complaints from limited experimental operations does not establish that broader deployment would be compatible with existing television services.[9]

Sinclair also identifies many unanswered technical questions concerning the operating characteristics of the proposed waveform and its potential interference effects on incumbent television operations. Among other things, Sinclair notes the need for rigorous analysis of co-channel and adjacent-channel receiver performance, receiver overload and other front-end effects, operation under representative conditions and at maximum authorized power, and

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[9] Comments of Sinclair Inc., MB Docket No. 26-263 at 2 (Oct. 19, 2026) (Sinclair Comments).

the effects on synchronized multi-transmitter configurations.[10] It also emphasizes the importance of reproducible technical measurements that can be independently evaluated.

These questions cannot be dismissed simply because LPTV stations operate on a secondary basis or because proponents expect their operations to comply with existing emission limits. Secondary allocation status does not establish that a new transmission waveform will operate compatibly with existing services, and compliance with an emission mask alone does not resolve all relevant receiver and interference considerations.

NAB agrees with Sinclair that the limited evidence presented by proponents does not provide an adequate technical foundation for the requested authorization. Even if the Commission could discern a coherent public interest justification from the conflicting positions of 5G Broadcast proponents, it would still face substantial unanswered questions about interference with existing television services. The Petition thus fails on technical grounds as well as public interest grounds.

IV. CONCLUSION

As NAB explained in its initial comments, the Petition would introduce an incompatible transmission standard into the U.S. television ecosystem in the middle of a technology transition without demonstrating a compelling public interest benefit. The record reinforces that conclusion. Even proponents of 5G Broadcast disagree about the fundamental obligations and regulatory framework that should accompany its use, and significant technical questions remain unresolved. Rather than advancing innovation, the Petition risks

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[10] Sinclair Comments at 4.

fragmenting the coordinated investments necessary to deliver new broadcast services to the public. The Commission should deny the Petition.

Respectfully submitted,

NATIONAL ASSOCIATION OF BROADCASTERS
1 M St. SE
Washington, DC 20003
(202) 429-5430



Alison Martin
Nandu Machiraju
Robert Weller

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