Market Analysis of the Independent Broadcasting Sector

Final Report

Submitted to

Coimisiún na Meán

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Introduction and Context

Indecon International Economic and Strategic Consultants was commissioned by Coimisiún na Meán ("An Coimisiún") to conduct an independent Market Analysis of the Independent Broadcasting Sector. This analysis complements other research and consultation activities undertaken during 2025 as part of the review of the Broadcasting Services Strategy ("BSS"), which will guide An Coimisiún's future approach to licensing and regulation under the Broadcasting Act 2009.

The analysis is undertaken against a backdrop of accelerated change in Ireland's media environment. Since the publication of the previous BSS in 2018, there have been significant shifts in audience behaviour, technology, market structure and the institutional context for regulation, including the establishment of Coimisiún na Meán and the introduction of Ireland's Online Safety Framework. The pace and scale of change have heightened the importance of ensuring that future licensing and regulatory approaches remain relevant, flexible and capable of supporting plurality, quality and public value.

This report draws on desk-based market and policy analysis, stakeholder engagement, and survey evidence from broadcasters and other relevant stakeholders. It complements separate audience research being undertaken by Coimisiún na Meán; findings from that work are reflected where relevant, but this strand is not designed to replicate dedicated audience fieldwork.

Current Market Structure and Dynamics

The analysis of domestic and international trends points to an independent broadcasting sector that remains valued by audiences, but increasingly shaped by platform competition, audience fragmentation and economic pressures. Key findings are summarised below:

- Audience behaviour is shifting: consumption is increasingly on-demand and platform-based, driving fragmentation and a gradual decline in linear usage over time.
- Radio continues to deliver strong reach and engagement and remains particularly important at local and regional levels. However, listening among younger cohorts has declined slightly over the last decade, while on-demand audio, podcasts and music streaming are reshaping consumption. In addition, smart speakers have overtaken traditional radio sets in Irish households.
- FM constraints persist: near-full FM capacity limits analogue-led entry/expansion, increasing the importance of digital pathways for new services.
- Total TV reach remains high but has declined steadily since 2019, with viewing increasingly fragmented across satellite, cable, IPTV and online platforms. Irish DTT, as a primary platform, accounts for approximately 12% of TV households and is skewed towards older cohorts. While DTT supports universal free-to-air access, its importance is likely to decline even further in the coming years. In 2025, 79% of TV Households own a smart TV, highlighting that smart TV ownership is now near universal across Ireland (74% of TV households own a smart TV that connects to the internet).
- The estimated size of the TV, radio and video-on-demand broadcasting market regulated by An Coimisiún has increased by over 10% in nominal terms between 2022 and 2025, driven primarily by growth in video-on-demand services, which increased by more than 25%.
- FM capacity constraints could limit the scope for additional services and limit efforts to fill geographic or local gaps. Digital distribution can enable niche services (music, speech, local interest, minority interest, community-focused) that may not be feasible within analogue

capacity constraints. Realising these opportunities could, however, require future licensing pathways and legislative changes (including under DAB+) that are practical, time-efficient and proportionate, alongside policy clarity on the role of different service types in delivering public value outcomes.

- Economic pressure is structural: advertising competition from large online platforms, rising costs, and digital investment needs are tightening sustainability. These challenges are particularly pronounced for smaller, local, and community-based services.
- The audiovisual sector is a key contributor to employment and economic output in Ireland, but as the sector becomes more digitalised, there is a growing need for ongoing professional development to keep up with technological advancements.

Future Trends and Potential for Digital Transformation

Indecon’s international analysis indicates that Ireland’s experience broadly mirrors trends in other jurisdictions. Across markets such as the UK, Germany, France, the Netherlands, Canada, Denmark, Australia and Switzerland, policymakers are responding to declining linear consumption, the growing dominance of on-demand and online platforms and increasing strain on traditional regulatory models. While institutional arrangements differ, a gradual shift towards more platform-neutral and proportionate approaches is emerging. Indecon’s ‘PESTLE’ analysis reinforces this, highlighting an external environment shaped by rapid technological change, evolving national and EU regulatory frameworks, intensifying competition from global platforms, and sustained pressure on traditional funding models.

Future of linear and hybrid models

Linear broadcasting is expected to continue to decline in relative importance over time – particularly among younger cohorts and for some genres – while remaining significant for many audiences and for specific use cases (including live content, shared events, and trusted news). The policy challenge is therefore to support a managed transition to hybrid models that combine broadcast and online distribution, rather than assuming an abrupt replacement of linear services.

Digital transformation opportunities and constraints

Digital transformation can support innovation, improve efficiency, and extend reach across multiple platforms. However, stakeholders highlighted constraints including investment capacity, digital skills, data/technology capability, and uncertainty over future licensing and regulatory requirements. This supports a policy approach that lowers avoidable barriers to entry and innovation through time-efficient licensing pathways and proportionate obligations, particularly for smaller and digital-only services. It is important to consider the potential for regulatory proportionality, where obligations could scale depending on the size of the service whilst maintaining standards.

Options for Future Structure and Policy

The analysis indicates that the independent broadcasting sector is operating within tightening structural constraints, with limited real growth in overall and advertising revenues and increasing competitive pressure from technological change and global digital platforms. While additional services may create opportunities for innovation and niche development, their sustainability would depend on cost structures, revenue diversification, scale efficiencies and clear audience differentiation. Given the uncertainty in the market and lack of revenue growth, the evidence does not support setting a fixed number for new services. Licensing decisions should instead be guided by their potential impact on competition and the value they offer to the public.

DTT

The report sets out a range of options for the future structure and regulation of the sector. A summary of the options identified for the future development of DTT is presented below. These options reflect different balances between universality, efficiency and long-term sustainability, and are not mutually exclusive. In particular, a platform-neutral universality approach can be progressed in parallel with decisions on the future role of DTT. A key consideration for An Coimisiún is that a clarified statement of the intended objectives of universality and resilience – and how these are expected to be delivered over time – would help to guide the future role of DTT and alternative pathways, and support investment and planning by market participants.

Summary of Options for Future Development of DTT		
Option	**Description**	**Key Implications**
Option 1: Maintain current DTT framework	Retain DTT broadly as it operates today	Preserves universality but implies ongoing under-utilisation and declining relevance
Option 2: Lean DTT focused on core public-interest services	Maintain DTT for Public Service Media and national free-to-air commercial TV	Aligns more closely with actual usage while preserving free-to-air access
Option 3: Platform-neutral universality framework	Focus on outcomes (access, prominence, public value) rather than transmission technology	Shifts emphasis from DTT to discoverability across connected and IP-based platforms
Option 4: Post-2030 spectrum review	Plan for re-evaluation of the 470–694 MHz band after EU protections expire	Enables longer-term consideration of sustainability, efficiency and alternative uses

FM

FM continues to be the primary broadcast platform in Ireland, but the remaining FM spectrum is now very limited. Although the band is close to full capacity, some spectrum is still available and could support a quasi-national service along with a small number of additional regional and local stations. However, recent licensing activity and feasibility research on a potential quasi-national or multi-city Irish-language youth service indicate that the costs of establishing and operating FM services may pose a significant barrier for new entrants. Based on an assessment of the existing spectrum and newly identified assignments, three potential future FM network configurations have been outlined:

- Option 1 provides capacity for one quasi-national network and a small number of regional services and targeted local coverage.
- Options 2 and 3 do not include a national network. Instead, they maximise the availability of regional and local services. Option 2 offers the greatest expansion for mid-scale operators, regional advertising markets, and cross-county networks. Option 3 places the strongest emphasis on local services, including two distinct Dublin commuter-belt networks.

Summary of Future Options for FM			
Option	**National**	**Regional**	**Local**
Option 1	• Quasi-national service which could include Gaeltacht areas	• Regional South-East service (assignments already agreed)	• Cork City and (part) County • Dublin and Commuter Belt • Galway City and potentially some of Connemara • Waterford City and (part) County
Option 2	-	• Regional South-East service (assignments already agreed) • Regional service covering Galway, Clare, Limerick, Cork and part of Kerry or divisions of the above • Regional service for Wexford, Waterford and parts of south Carlow/Kilkenny • Regional service similar to iRadio NW (but with less coverage in Galway)	• Cork City • Dublin and Commuter Belt (up to Dundalk) • Galway City and potentially some of Connemara
Option 3	-	• Regional South-East service (assignments already agreed) • Regional service covering Galway, Clare, Limerick, Cork and part of Kerry or divisions of the above	• Cork City • Dublin and Commuter Belt 1 • Dublin and Commuter Belt 2 • Galway City and potentially some of Connemara • Waterford City and (part) County

DAB+

DAB+ has the potential to support greater choice, innovation, and diversity within the radio sector, while providing an additional pathway for developing new and existing services alongside FM broadcasting. Stakeholder engagement as part of this research highlighted the importance of ensuring that, should a DAB+ licensing framework be developed in the future, it is proportionate, sustainable, and aligned with the economic realities of digital broadcasting, particularly for smaller, local, and community services. Stakeholders also emphasised the need to balance regulatory objectives with the promotion of plurality, accessibility and market entry.

Given the strategic importance of digital radio to the sector's future development, An Coimisiún intends to undertake a separate consultation process on pre-licensing actions and, further, potential licensing options. This work will progress independently of the Broadcasting Services Strategy review and will give stakeholders a dedicated opportunity to consider the future licensing, regulatory, and operational framework for DAB+ services, should DAB+ licensing be implemented in Ireland.

Overall Conclusion

Ireland’s independent broadcasting sector is a key component of the media ecosystem but is operating within a rapidly changing environment that places pressure on traditional structures, business models and regulatory approaches. Clear long-term licensing and policy direction will be required to reduce uncertainty, support investment and sustain plurality and public value. The findings support the case for a Broadcasting Services Strategy that is adaptive, evidence-led and capable of evolving in step with technological change, audience behaviour and market dynamics. The evidence also supports a staged approach: clarifying the objectives and future role of DTT within a wider universality framework, considering future approaches to DAB+ development through a separate consultation and licensing roadmap process, and progressively modernising licensing and regulatory arrangements to remain effective in a hybrid broadcast and online environment.

1 Introduction and Background

1.1 Introduction

Indecon International Economic and Strategic Consultants (“Indecon”) has been commissioned by Coimisiún na Meán (“An Coimisiún”) to conduct an independent Market Analysis for the Independent Broadcasting Sector. This analysis will complement other research and consultation activities being undertaken during 2025 and 2026, as part of An Coimisiún’s review of its Broadcasting Services Strategy (“BSS”). These activities will inform the development of a new BSS that will support An Coimisiún’s strategic outcomes. The new BSS is expected to be published later in 2026.

1.2 Background

An Coimisiún is Ireland’s independent agency for developing and regulating a diverse, creative, safe and trusted media landscape.[1] An Coimisiún is responsible for regulating broadcasters, video-on-demand providers and online platforms established in Ireland. Its functions and responsibilities are set out in the Broadcasting Act 2009 (“the 2009 Act”).[2] The 2009 Act envisages that three principal strands of broadcasting will shape the Irish broadcasting environment – public, commercial and community.[3] The 2009 Act is prescriptive in its requirement of An Coimisiún to develop and implement licensing plans. Further provisions of the 2009 Act impose a range of advertising and programming regulations, as well as a range of contractual conditions on broadcasters.

The Broadcasting Act 2009 identifies the range of broadcasting and content provision contracts that An Coimisiún can enter into and provides the regulatory framework in which these contracts are awarded and operate. These include contracts awarded under:

- Section 64 (community sound broadcasting) - Authorises not-for-profit radio services run by and for a community, focused on social benefit rather than profit.;
- Section 65 (commercial sound broadcasting) - Provides the framework for inviting and assessing applications for commercial, profit-driven radio services within designated areas.;
- Section 66 and 67 (Sound Broadcasting Contracts)
- Section 68 (temporary, pilot or institutional services) - Allows short-term (30-day), pilot (100-day), or low-power institutional radio services such as for schools or hospitals.
- Section 70 (the national Television Programme Service Contract) - Provides for the awarding of a national free-to-air TV service contract with cultural, democratic, and public-interest programming requirements.
- Section 71 (Content Provision Contracts) - Section 71 content provision contracts apply to linear television and radio services delivered via third-party platforms, including satellite, cable, IPTV and broadcast multiplexes (DTT and DAB+).
- Section 72 (Community Content Provision Contracts) - Allows community groups to supply programme content for broadcast where the objective is community benefit and minimal cost recovery.
- Section 131 (Multiplex Contracts) - Empowers the Commission to contract multiplex operators to establish, operate, and maintain digital broadcasting multiplexes, including national multiplexes.

[1] Source: https://www.cnam.ie/about/
[2] Source: https://www.irishstatutebook.ie/eli/2009/act/18/enacted/en/html
[3] Source: https://www.cnam.ie/app/uploads/2024/11/Broadcasting-Services-Strategy.pdf

An Coimisiún was established in March 2023, when it succeeded its predecessor, the Broadcasting Authority of Ireland (BAI), further to the provisions of the Online Safety and Media Regulation Act 2022. Consequently, An Coimisiún is now also responsible for Ireland's Online Safety Framework, which will hold online services accountable for the implementation of measures to protect people, especially children, from potentially harmful content online. In respect of broadcasting matters, An Coimisiún works alongside another key regulatory body, ComReg, which is the statutory body responsible for the regulation of the electronic communications sector and the postal sector in Ireland.

While the 2009 Act originally required the BAI to produce a BSS, the 2022 legislative amendments removed this obligation. Nevertheless, An Coimisiún's Strategy 2025-2027, published in April 2025, and the associated three-year work plan highlight the importance of reviewing the BSS as a key enabler for achieving An Coimisiún's vision and six strategic outcomes, particularly Democracy, Irish Culture & Media, and Diversity & Inclusion.

The current BSS was published in 2018 by the BAI and was the second such strategy published. While the BSS in 2018 anticipated change and evolution in the regulatory and media landscape since its first publication in 2012, the pace of change accelerated exponentially and continues to do so. Thus, the previous BSS was developed under the BAI in a markedly different institutional and sectoral context. Since then, there have been significant changes to the media ecosystem, market dynamics, the role and value of independent media in the landscape and audience preferences, interests and needs. Thus, the growth and future potential of the sector must be considered against this ever-changing backdrop.

The 2026 BSS will reflect these changes and serve as an enabler for An Coimisiún's vision for the sector and Irish audiences. The BSS's main purpose is to guide An Coimisiún's future approach to the licensing (and re-licensing) of radio and television broadcasting services pursuant to its statutory licensing powers under both Part 6 and Part 8 of the 2009 Act and deliver on its related strategic outcomes. Part 6 and Part 8 of the 2009 Act prescribe the procedures for the award of sound broadcasting (radio) contracts and television contracts, and the award of multiplex contracts which are described in more detail in Section 4.3.

Importantly, there are several contracts which broadcasters can apply for from An Coimisiún, either through a competitive public process for a specific channel/frequency, or through an open approach. An Coimisiún is responsible for the licensing of commercial and community radio and TV stations in Ireland. The Irish market is also subject to ownership and control limits and a range of content and advertising rules, consistent with overall relevant European regulation. Legislative reform of these contract provisions is expected post-2026, for which this research can support.

Considering the continued and accelerating changes in the media and broadcasting environment, such as the return of DAB+ in 2025, the revised BSS will need to enable dynamic and adaptive licensing policies. It will also play a critical role in supporting quality programming, including increased provision of content in the Irish language, and in ensuring that the regulatory framework remains relevant, flexible and future-proof. This study provides a market analysis to support the development of the next BSS and to support the effective delivery of An Coimisiún's strategic outcomes. It was informed by, and coordinated with, other research undertaken by An Coimisiún, including recent comprehensive audience and media consumption research.

Ireland's broadcasting landscape comprises a mix of service types spanning Public Service Media (PSM) and commercial and community radio and television services. The Public Service Broadcasters (PSBs), namely RTÉ and TG4, while not licensed by An Coimisiún as they are established by law, are regulated by An Coimisiún and provide both radio and television services which remain central pillars of Ireland's media system.

Beyond the public service domain, the market includes 33 commercial radio stations and 21 community radio services operating at national, regional, local and community level. This level of diversity in the radio market demonstrates the importance that Irish audiences place in local radio and highlights the degree to which Irish radio services continue to anchor listening despite broader shifts in consumption and technology.

Television provision includes one national independent free-to-air broadcaster, Virgin Media Television (previously TV3), alongside two Community Television stations currently operating in Ireland, Dublin Community Television (DCTV) and Cork Community Television (CCTV), as well as a broad range of more niche-type channels on digital, satellite and cable platforms, such as the Discovery channels, SIS, and Premier Sports. A number of additional UK-based commercial television services are also available on these platforms (e.g., ITV, Channel 4); however, these are not licensed in Ireland.

The Irish broadcast market is subject to public intervention in the form of funding and oversight; all TV households must pay a licence fee, which is primarily used to fund RTÉ, the main Public Service Broadcaster in Ireland. An Coimisiún also manages the administration of two funding schemes for broadcasting content/programming. The revenue of the fund comprises 7% of the annual net receipts from television licence fees. These schemes serve as a crucial tool for advancing several important strategic goals of Coimisiún na Meán.

Generally, Irish broadcasters and other relevant stakeholders agree that the TV and radio markets meet the current needs of their audiences; however, there is uncertainty whether their model is sustainable in the future (see Figure 2.1 & Figure 2.2). Stakeholders acknowledged that there is more choice of content and diversity across content now compared to 2018, when the last BSS was published, although this did not translate into meaning that there was more diversity across providers, as many stakeholders noticed an increase in consolidation and partnerships within the sector, and within radio (see Figure 2.3). Stakeholders also noted a substantial growth in the use of on-demand content, including podcasts. While on-demand content provides new challenges for broadcasters in terms of audience attention, the continued importance of live sport and entertainment has also provided new opportunities for the sector (see Figure 2.4).

1.3 Scope of Research

The new BSS will be informed by a number of research activities, including this report. This study assessed the current configuration, performance and dynamics of the sector and examined the key trends and external pressures shaping its future, including technological change, the emergence of new platforms, audience fragmentation and innovation in content creation and delivery. It also examined the sustainability of different service types and broadcasting models, including the role of digital formats such as DAB+, and considered how alternative or evolving licensing approaches could support a more diverse, resilient, and future-ready sector.

In particular, the study examined the structure and functioning of the broadcasting market and its prospective evolution; evaluated the scope for digital transformation across the sector; considered alternative future configurations for the independent media sector and the licensing framework required to sustain its societal role and public value; reviewed the case for more flexible and less prescriptive approaches to radio and television licensing and regulation; and assessed the level of interest in, and potential pathways for, the progression of Digital Terrestrial Television (DTT).

1.4 Methodological Approach

As part of this review, survey work with broadcasters and other relevant stakeholders was undertaken and an examination was completed of the Irish media and broadcasting sector. The survey was open to stakeholders between September 2025 and October 2025, and in total, Indecon received 71 responses. Of those, 68% were radio broadcasters and 17% were TV broadcasters. Video-on-demand service providers, internet streaming platforms, and Public Service Media organisations made up the rest of the respondents. This is broadly reflective of the media sector. Around 20% of broadcasters surveyed are community/community of interest broadcasters, with another 35% targeting a local audience. About 15% of broadcaster respondents serve regional audiences, and 30% deliver broadcasts to a national audience.

Consultations with key stakeholders were also completed, as well as a rigorous analysis of the available evidence on the key trends and issues. The consultations provided respondents with an opportunity to discuss their inputs to the survey in greater detail. Extensive desk research of previous studies and related literature also informed the review, as well as an international review to compare the Irish broadcasting environment to that in other countries, including the UK, Germany, France, the Netherlands, Canada, Denmark, Australia, and Switzerland.

Data provided by Coimisiún na Meán also helped inform the review, such as:

- Number and type of broadcast services
- Number of listeners/viewers and reach by platform
- Geographical spread of broadcasting services
- Information regarding on-demand services, DTT, and DAB+ availability and usage
- Numbers of smart speakers, smartphones, smart TVs, and traditional radio/TV sets
- Information on audience preferences and media consumption

Additional datasets that were used to support the analysis include:

- Central Statistics Office (CSO)
- JNLR listenership data
- Revenue Commissioners Cost of Tax Expenditure
- TAM Ireland viewing data and TAM Ireland Establishment Survey data
- Eurostat: On media trust, access, and digital literacy

These complementary strands of quantitative and qualitative analysis provided a robust evidence base to support the analysis of the current media marketplace, its structure and dynamics, and the key trends shaping its evolution. This integrated approach enabled the distillation of the principal drivers of change affecting the Irish broadcasting sector, including technological, market, behavioural and regulatory factors, and informed a structured PESTLE assessment of the external environment.

1.5 Report Structure

The remainder of this report is structured as follows:

- Section 2 outlines the current market structure and dynamics of the independent broadcasting market in Ireland, including resource constraints, skills in the sector and revenue sources and patterns. The assessment of the market structure is split out by the two markets: audio and video. This section also includes insights from respondents to the Indecon survey.
- Section 3 assesses the future trends for the market, with specific mention of the potential for digital transformation within the radio sector (DAB+). It also compares the Irish TV and radio sector to that of international comparators, such as the UK. Finally, the section sets out a PESTLE analysis of the sector.

- Section 4 sets out the options for the future structure of the sector.
- Section 5 integrates the detailed analyses undertaken in the preceding sections to set out our overall conclusions from the research and assessment.

1.6 Acknowledgements and Disclaimer

Indecon would like to acknowledge the valuable assistance and inputs provided by staff at An Coimisiún na Meán in the completion of this analysis. In addition, Indecon would like to thank the stakeholders from the broadcasting sector who engaged with the information request and consultations. Indecon held bilateral meetings with the following organisations:

- Bauer Media Audio Ireland
- Commission for Communications Regulation (ComReg)
- Craol
- Department of Culture, Communications and Sport
- Digital Radio Alliance Ireland (DRAI)
- Foothold Communications (Fáilte DAB)
- Independent Broadcasters of Ireland (IBI)
- IPSOS B&A
- Ofcom
- Onic
- Radiocentre Ireland
- RTÉ
- Virgin Media TV

The usual disclaimer applies, and the responsibility for the contents of this report remains with Indecon.

2 Current Market Structure and Dynamics

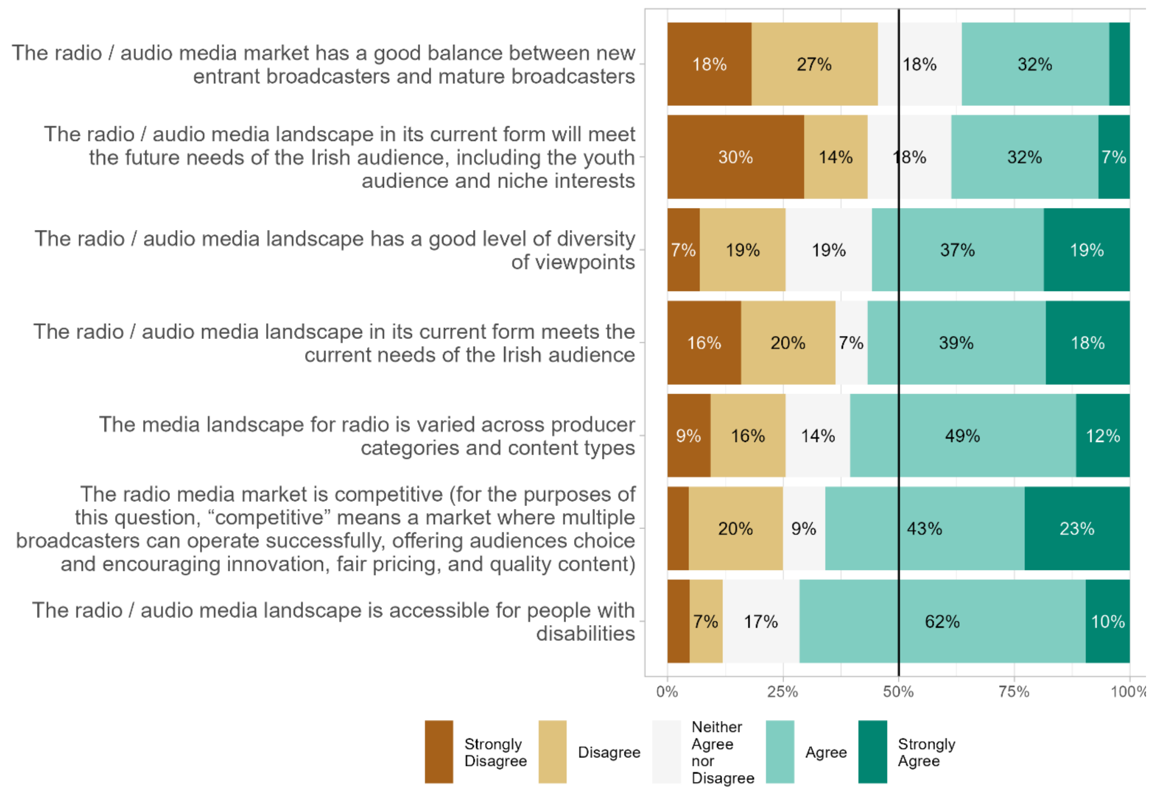
2.1 Introduction

This chapter explores the structure and dynamics of the Irish independent media market, analysing evolving media structures, shifting market dynamics, and the role of independent media within the audiovisual markets. In the next sub-section, we present a set of overarching insights from the survey of broadcasters in Ireland which we carried out as part of this project. We then turn to analysing data on the market structure and dynamics in Section 2.3. In Section 2.4, we present a number of resourcing considerations including financials and skills issues. Section 2.5 concludes the section and summarises the insights.

2.2 Insights from Irish Broadcasters

In undertaking the environmental and economic analysis to inform the review of the Broadcasting Services Strategy, it is important to consider the perspectives and insights of Irish broadcasters and other relevant stakeholders. The findings from Indecon's new survey research among stakeholders in the independent broadcasting sector are summarised in Figure 2.1 below in respect of the current radio/audio market segment.

Figure 2.1: Survey Research – Current Radio/Audio Media Market in Ireland



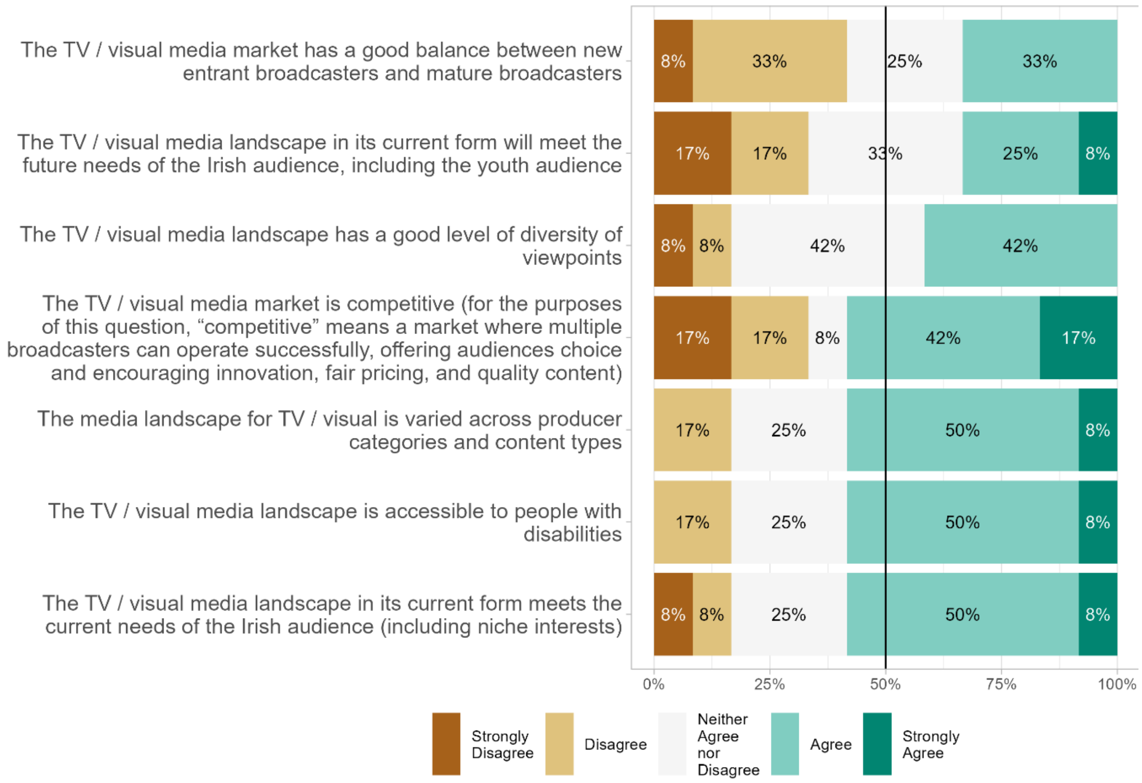
Source: Indecon Survey of stakeholders in commercial media, community media, video-on-demand providers, participants in DAB trial and others

Public

In the radio/audio market, Indecon's research suggests that 57% of respondents agree that the current radio/audio sector meets the current needs of the Irish audience, while 36% disagree. In terms of plurality, 56% of respondents indicated that the radio/audio sector has a good level of diversity of viewpoints. However, the prospects for the future are less positive, as 44% of respondents disagree that the current radio/audio market will meet the needs of the Irish audience in the future. Relatedly, a low percentage of respondents (38%) agree that there is a good balance between new entrants and mature broadcasters in the radio/audio market, and 45% disagree, suggesting concerns about market dynamics and entry conditions. At the same time, a high percentage (61%) agreed that the media landscape for radio is varied across producer categories and content types, and an even higher proportion (66%) agreed that the market is competitive in the sense that it facilitates the successful operation of multiple broadcasters offering audience choice, encouraging innovation, fair pricing, and quality of content. In terms of accessibility, 72% of respondents in the survey agreed that the audio/radio landscape is accessible for people with disabilities.

Figure 2.2 highlights respondents' feelings on the current TV and audiovisual market in Ireland.

Figure 2.2: Survey – Current TV/Audiovisual Media Market in Ireland

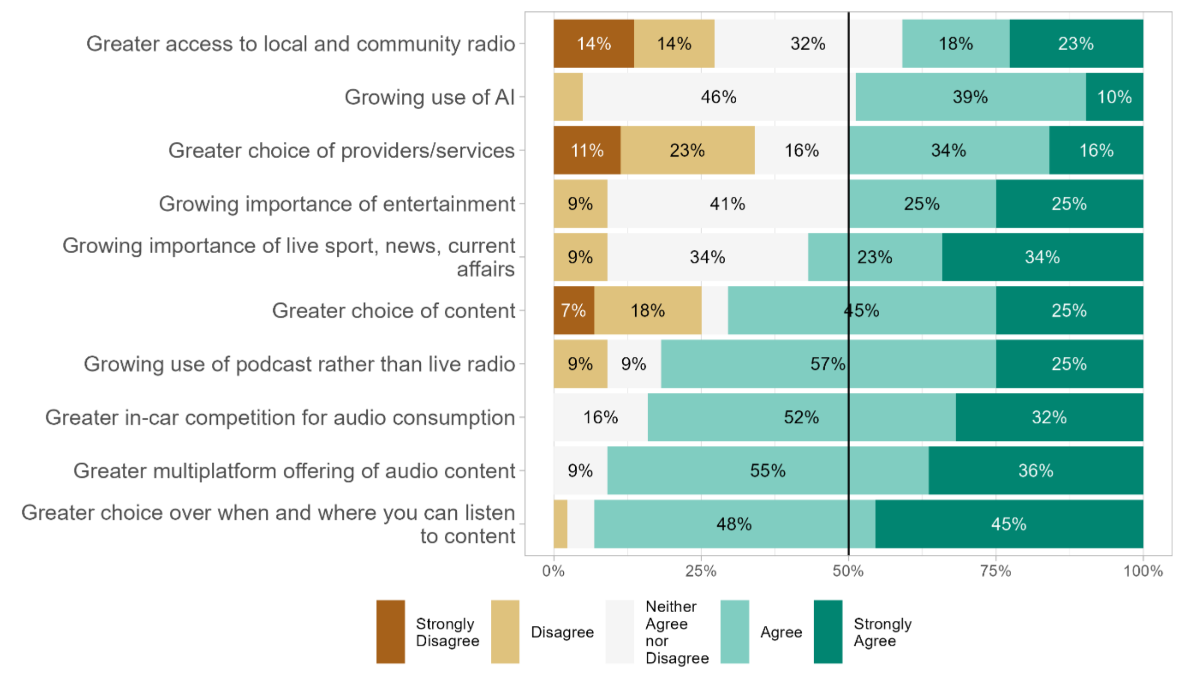


Source: Indecon Survey

In the TV/audiovisual media market, the Indecon research indicates a more neutral assessment by respondents of how well the sector is currently functioning and how prepared it is for future needs. When assessing whether the current TV/audiovisual media landscape meets the present needs of the Irish audience, including niche interests, 58% of respondents agree, compared with 16% who disagree. Just one-third (33%) believe the current TV/audiovisual media landscape will meet the future needs of Irish audiences, whereas another third (34%) disagree, signalling uncertainty about whether the existing model is sufficiently adaptive to changing consumption patterns. Only around one-third (33%) agree that the TV/audiovisual media market maintains a good balance between new entrants and established broadcasters, while a combined 41% disagree. Views on plurality are more positive. Over half of respondents (58%) agree that the TV/audiovisual media landscape has a good level of diversity across producer categories and content types, and 42% consider the sector to have a good level of diversity of viewpoints. Half (58%) agree that the TV/audiovisual media landscape is accessible to people with disabilities. In relation to competition, 59% of respondents agree that the market is competitive.

When asked about changes to the radio/audio media market since 2018, when the previous BSS was produced, as depicted in Figure 2.3 many of the respondents felt that there is now greater choice over when and where audiences can listen to content (93%) and greater multiplatform offering of audio content (91%). In addition, the respondents recognised the growing use of podcasts (82%). In contrast, many of the respondents disagreed or strongly disagreed that there was greater choice of providers (34%), greater access to local and community radio (28%) and greater choice of content (25%) compared to 2018. This could reflect the increase in consolidation and partnerships in the market, to combat the rising costs of broadcasting activities and technology advancements. For example, Bauer Media Audio Ireland is Ireland's largest commercial radio group with several radio stations. In 2025, Bauer acquired Clear Channel Europe North, and in 2024, Bauer finalised the acquisition of Beat 102 103.[4]

Figure 2.3: Survey – Substantial Changes in Current Radio/Audio Media Market in Ireland since 2018



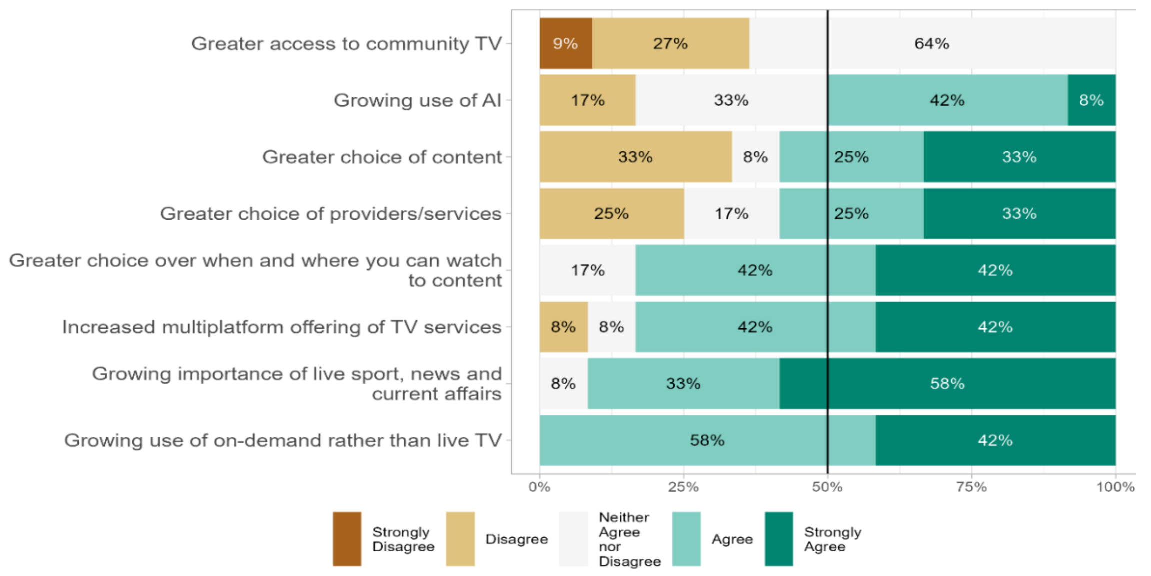
Source: Indecon Survey

As depicted in Figure 2.4, when asked about changes in the TV/audiovisual media market, 100% of respondents agree or strongly agree that there is a growing use of on-demand media rather than live

[4] Source: https://bauermedia.ie/

TV. In addition, many (92%) feel that there is a growing importance of live sport, news and current affairs in the TV market. This is an opportunity for linear broadcasting to remain relevant in a new digital age. As with radio, some respondents (36%) disagree or strongly disagree that there is greater access to community TV in the current market.

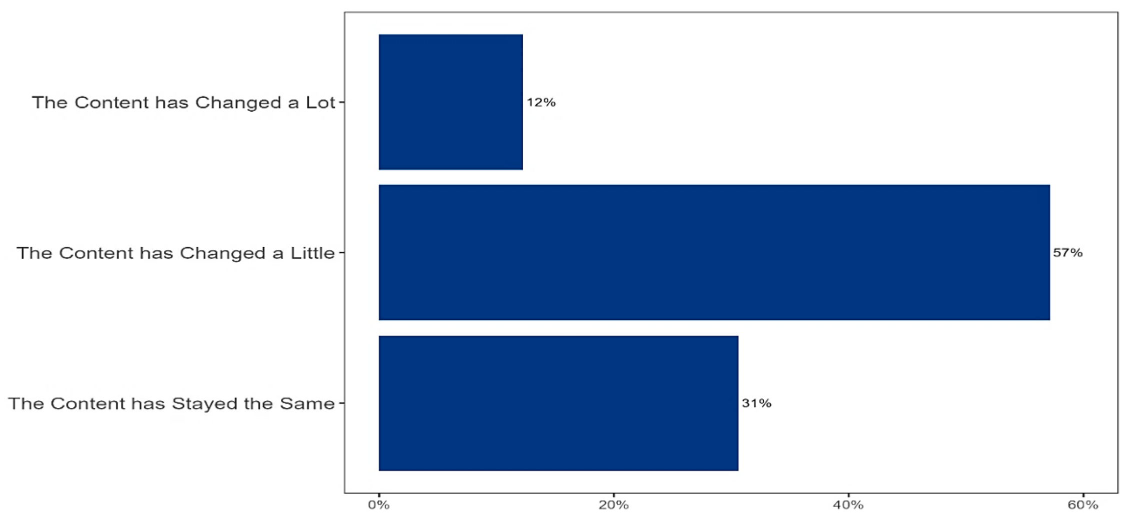
Figure 2.4: Survey – Changes in TV/Audiovisual Media Market in Ireland



Source: Indecon Survey

In terms of how content has evolved, the prevailing view is that content strategies have shifted gradually over time (Figure 2.5).

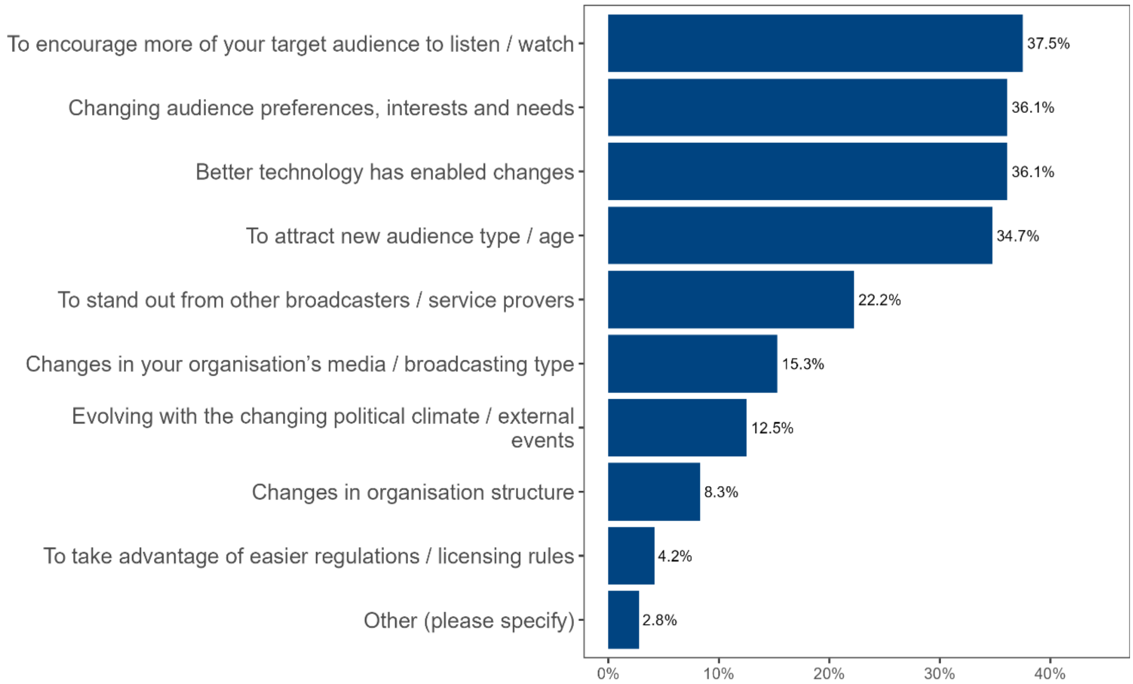
Figure 2.5: Survey – Changing Content Over Time



Source: Indecon Survey

In terms of the factors underlying changes in the type of content provided, respondents most commonly pointed to efforts to strengthen engagement with target audiences (38%), to respond to shifting audience preferences (36%) and technological improvements (36%). This is depicted in the figure below. Attracting new audience types or age groups was also cited as a relatively common reason for changing content.

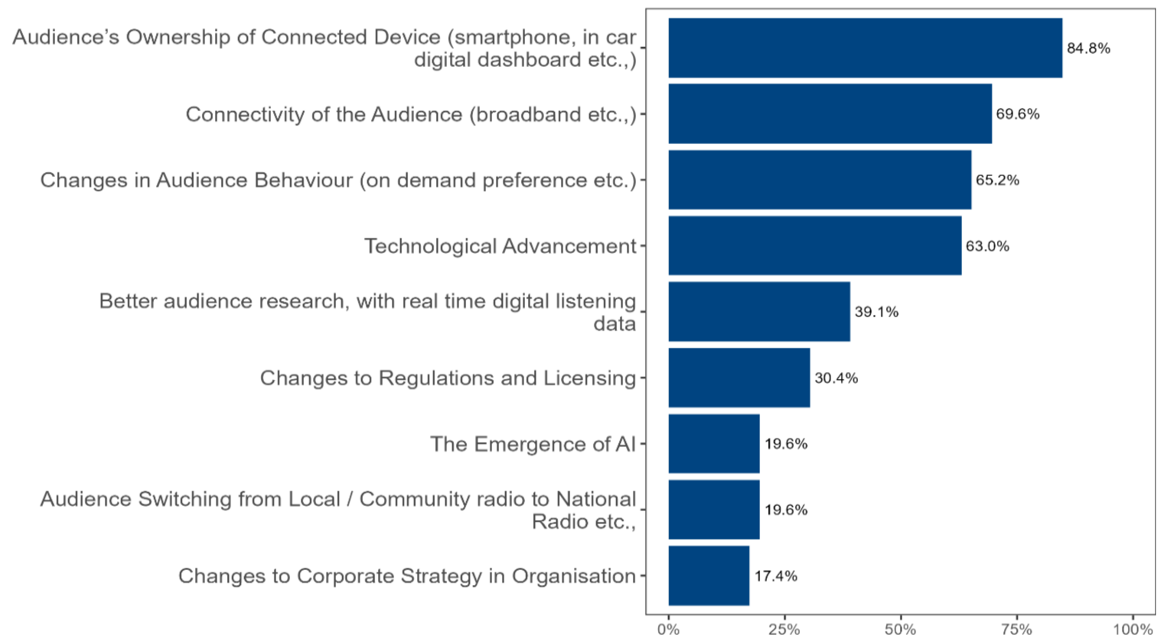
Figure 2.6: Survey – Factors to Changing Content



Source: Indecon Survey

When asked about the drivers of change in the radio/audio sector, respondents largely agreed that audiences' ownership of connected devices (85%), the connectivity of audiences (70%) and the changing preference for on-demand media (65%) were the three most impactful factors, as highlighted in the figure below. This suggests that broadcasters feel the changes seen in the radio sector are driven by changes in audience preference and connectivity.

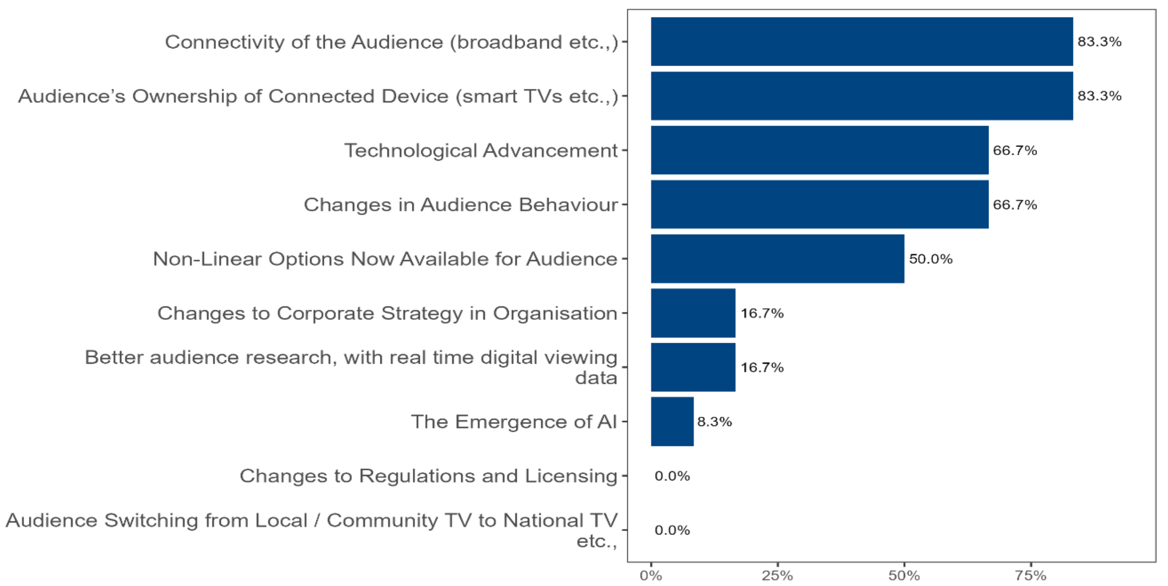
Figure 2.7: Survey – Drivers in Radio/Audio in Ireland



Source: Indecon Survey

Figure 2.8 shows that the main drivers of change for the TV and audiovisual sector mirror those seen in the radio market, specifically the connectivity of audiences (83%) and the audience's ownership of connected devices (83%).

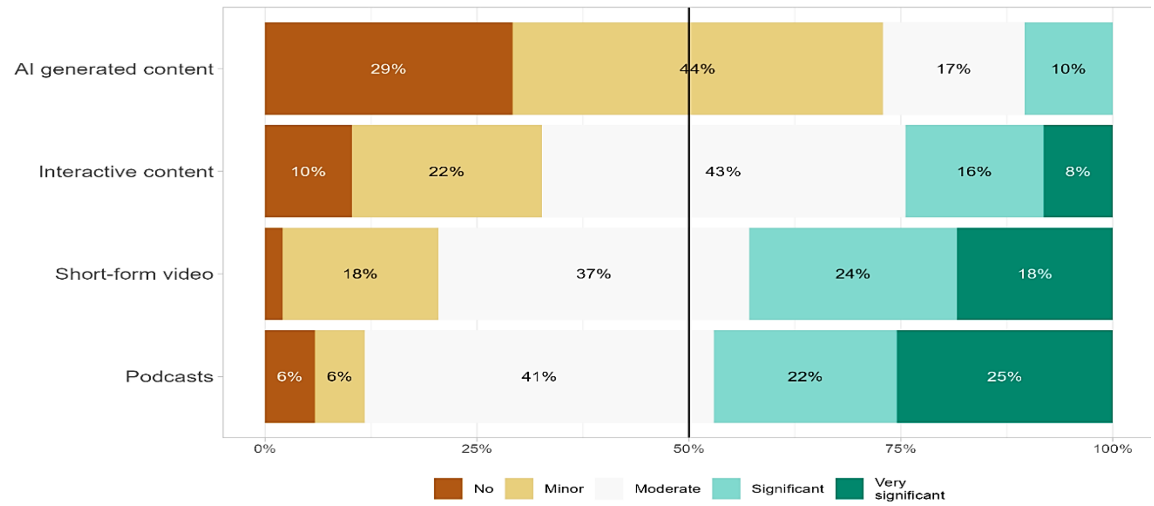
Figure 2.8: Survey – Main Drivers in TV/Audiovisual Market in Ireland



Source: Indecon Survey

Independent broadcasters' experimentation with new content formats is occurring to a moderate or significant extent, depending on the types of formats. Highlighted in the figure below, podcasting is the most widespread area of innovation, with 47% of respondents having experimented significantly or very significantly and 41% having experimented moderately. Experimentation with short-form videos was also moderate or significant across a large proportion of respondents, while experimentation with interactive content and AI-generated content was relatively limited.

Figure 2.9: Survey – Experimentation with New Content Formats



Source: Indecon Survey

2.3 Overall Market Structure and Trends

Recent developments in the Irish audiovisual (TV, radio and video-on-demand ("VOD")) sector point to a sector that has expanded in nominal terms, amid a period of significant transformation. The overall size of the market has increased by over 10% in nominal terms, from €848.6 million in 2022 to an estimated €938.3 million in 2025, driven primarily by VOD, which increased by more than 25%. The size of TV remained stable over the period, while radio increased by just over 3%. Notably, the market for VOD has overtaken that for TV over the period.

Table 2.1 Estimated Size of TV, Radio and VOD Market Amongst Regulated Entities in Ireland, € Million

	2022	2023	2024	2025	% Change (2022 - 2025)
TV	394.1	397.4	396.7	395.9	0.4%
Radio	126.3	130.1	130.1	130.2	3.1%
VOD	328.2	416.5	414.3	412.2	25.6%
Total	**848.6**	**944.0**	**941.1**	**938.3**	**10.6%**

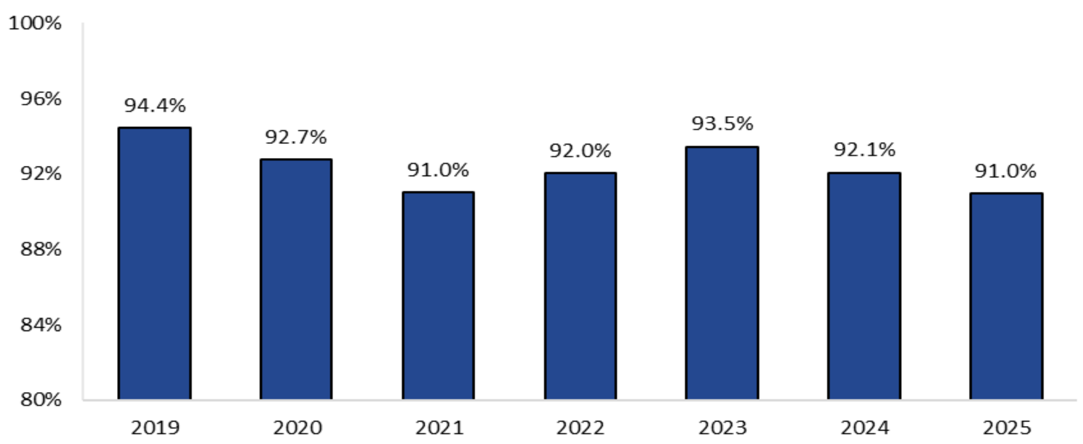
Source: Coimisiún na Meán and Indecon estimates
Notes: The value for 2025 is an estimate based on levy rates. For 2024, an average between 2023 and 2025 is used.

The remainder of this section discusses recent trends in the video and audio markets, respectively.

Audiovisual Market

Television remains an important component of the Irish video market. Figure 2.10 shows that total TV reach is at 91% on average in 2025, having declined from an average of 94% since 2019.

Figure 2.10: Average Annualised Total TV Reach

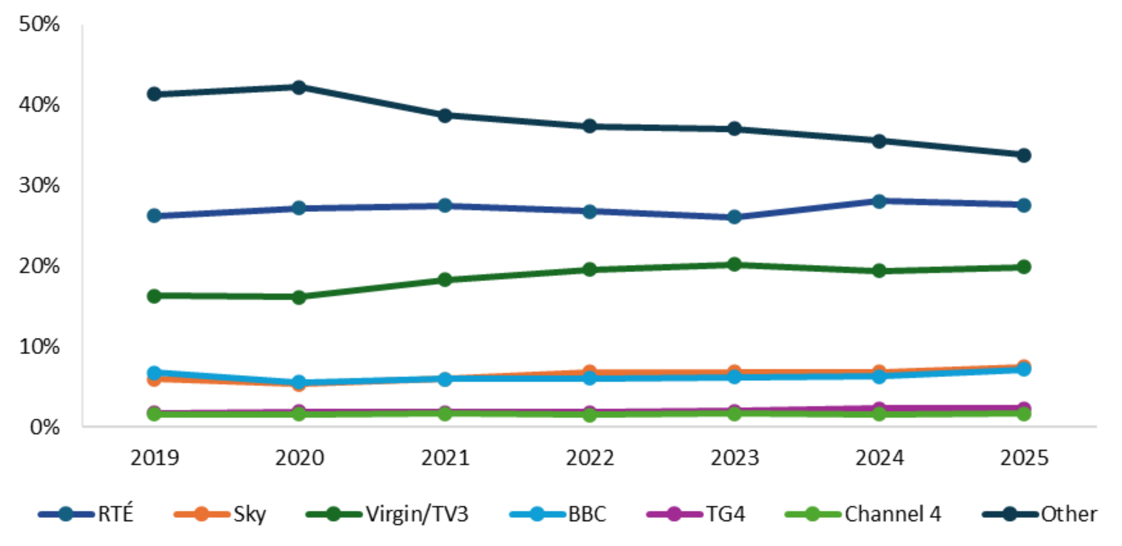


***Source: Indecon Analysis of TAM Ireland Data, National, TV Reach, Total TV, 2019 – 2025 TV Reach and Share Figures*[5]**
Note: Reach is the percentage of people who have seen a specified amount of a piece of TV content (e.g., for example, tuned into a TV programme). The standard TAM definition is for this to be at least one consecutive minute.[6]

[5] Historic data sourced from https://web.archive.org/web/20250000000000*/https://www.tamireland.ie/category/viewing-trends/. 2019 months: July, September, October & December; 2020 months: March, May, August & December; 2021 months: January, February, June & September; 2022 months: March, July, September & November; 2023 months: April, October & November; 2024 months: January, June, October & December; and 2025 months: February, May and October.
[6] Source: https://www.tamireland.ie/tam-metrics-explained/

Although national average television viewing remains substantial at 150 minutes per person per day, it has decreased over time; in 2014, the average was 208 minutes per person, with the sharpest decline among those aged 15 to 34. The next figure presents trends in channel group audience shares between 2019 and 2025. RTÉ's share fluctuates within a relatively narrow band between 26% and 28%. The share of Virgin Media TV remains broadly stable around 18% but shows a modest increase over time. Sky also shows a gradual upward trajectory over the period but remains below 10%. Channel 4 remains stable over the period, while TG4 exhibits a modest upward trend, though both continue to account for relatively small shares of under 5%. The "Other" category remains the largest throughout the period, though its share falls over the time period from approximately 41% in 2019 to 34% in 2025.

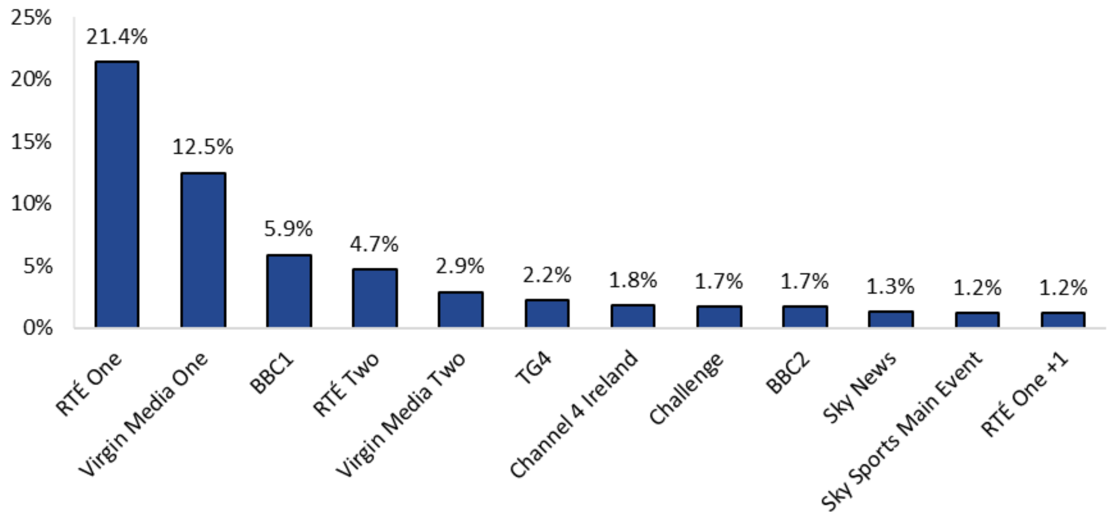
Figure 2.11: Average Annualised Total TV Audience Shares



Source: Indecon Analysis of TAM Ireland Data, National, TV Audience Share of Viewing, Total TV, 2019 – 2025 TV Reach and Share Figures

In terms of individual channels, Figure 2.12 illustrates the distribution of audience shares across the main free-to-air services in November 2025. RTÉ One remains the largest channel with just over 21% of viewing, while Virgin Media One follows at 13%. BBC1 and RTÉ2 sit just above and below the 5% threshold respectively, and Virgin Media Two and TG4 each attract between 2% and 3%. All other free-to-air channels available in Ireland account for less than 2% each, with six channels falling between 1% and 2%, and a long tail of services with smaller individual shares, including 29 channels in the 0.02% to 1% range.

Figure 2.12: Market Viewing Shares of Main TV Channels in Ireland, November 2025



Source: Indecon Analysis of TAM Ireland Data, National, TV Audience Share of Viewing, Total TV, November 2025 TV Reach and Share Figures

Figure 2.13 illustrates the profile of TV Households in Ireland in July 2025 by reception type. A reception type refers to the hierarchical classification of each household based on its highest-level television reception platform. As this is a mutually exclusive categorisation, each household is assigned to a single primary platform. This measure is therefore appropriate for assessing the proportion of households for whom DTT represents the highest-level reception platform. A TV Household refers to a household with at least one working TV set and at least one of the following reception types:[7]

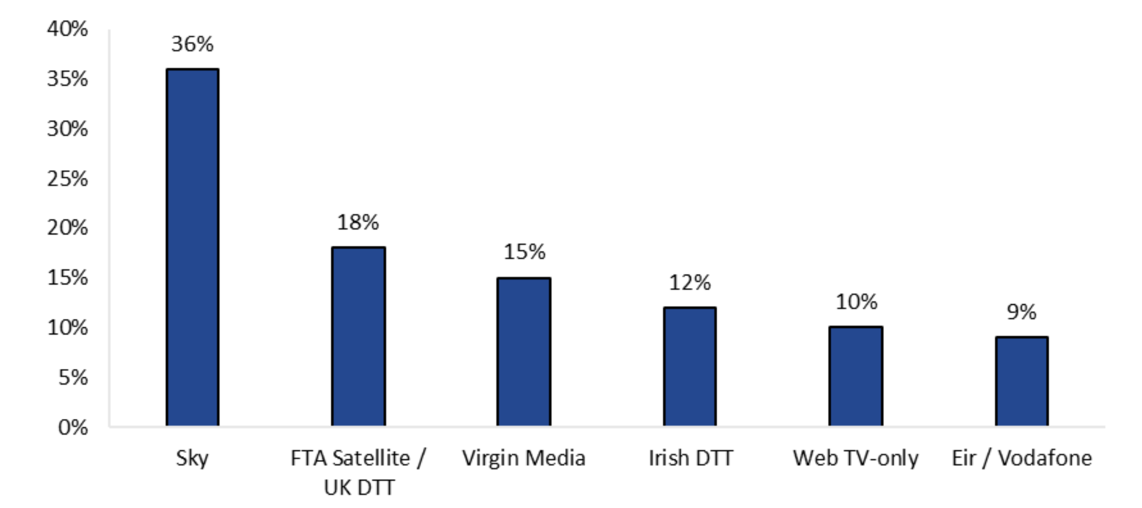
- Sky: TV Households with an active Sky Subscription
- Virgin Media: TV Households with Virgin Media cable/stream service and households with local cable service
- Eir/Vodafone: TV Households with Eir/Vodafone IPTV Service
- FTA Satellite/UK DTT: Free-to-Air (FTA) Satellite and UK DTT are combined in this analysis
    - FTA Satellite – TV Households that receive UK Freesat or foreign language satellite channels through a satellite dish
    - UK DTT – TV Households that receive UK Freeview channels via an aerial
- Irish DTT: TV Households which receive any or all of the channels under RTÉ, Virgin Media, TG4 and Sky News via an aerial
- Web TV-Only: TV households with Broadband that can watch content online through a Smart TV or connected device

In July 2025, TV Households that have an active Sky subscription are the dominant highest-level platform, followed by Free-to-Air satellite and/or UK DTT. Irish DTT reflects 12% of TV Households according to this measure, a figure that has remained steady over the past decade or so.[8] In addition,

[7] Source: https://www.tamireland.ie/app/uploads/2025/07/Understanding-TV-Data-2025.pdf
[8] Source: https://banda.ie/wp-content/uploads/Ian-McShane-ES.pdf.

Ofcom research (2024) found that UK households that rely on DTT are more likely to include people who are older.[9] Likewise, recent research on the Establishment data from TAM also found that while the Irish DTT reliance is low, it is still relevant, especially for the older cohort.

Figure 2.13: TV Household Profile by Reception Type, July 2025



Source: Indecon Analysis of TAM Ireland/Nielsen Data, National, TV Households, Reception Type, July 2025 (https://www.tamireland.ie/universes/)

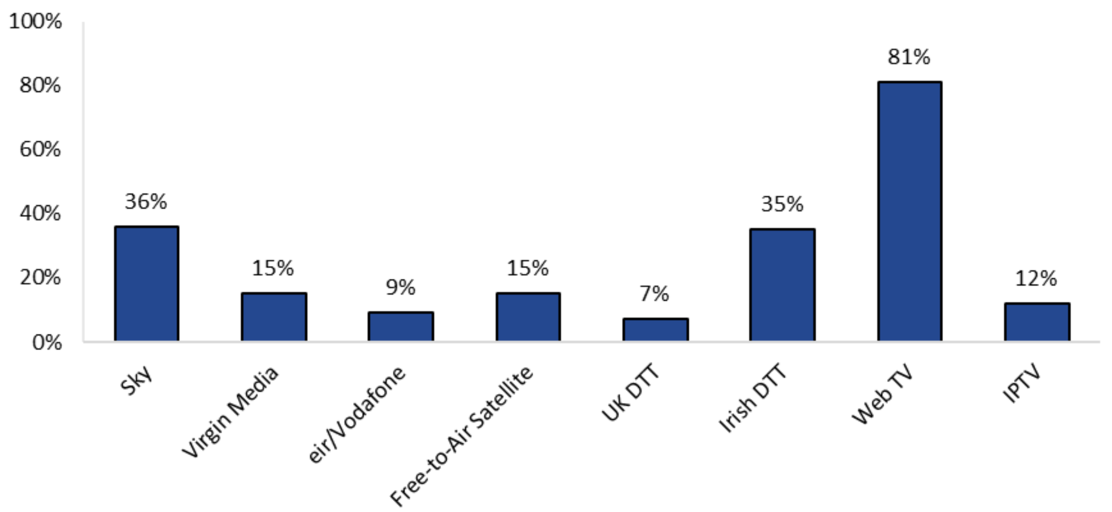
Note: A reception type refers to the hierarchical classification of each household based on its highest-level television reception platform.

By contrast, a Reception Method refers to the presence of specific reception technologies within households and is not mutually exclusive. A household may have access to multiple reception methods (for example, a Sky household may also have access to Irish DTT). Thus, these figures reflect platform access as opposed to primary household classification and therefore exceed the shares reported under Reception Type.

Based on July 2025 data, the next figure shows that Irish DTT reception method is available in 36% of households, while Web TV capability is present in 81% of homes, reflecting broader shifts toward internet-based TV. In addition, the share of households with no TV set increased incrementally, with TV penetration down from 92% in July 2019 to 89% in July 2025, signalling ongoing diversification in media consumption habits as online alternatives become more pervasive.[10]

[9] Source: https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/269636-call-for-evidence-future-of-tv-distribution/future-of-tv-distribution-report-to-government.pdf?v=344045
[10] Source: TAM Ireland/Nielsen Media Ireland, Establishment Survey Data, Base: All Households, January 2014 – January 2025

Figure 2.14: TV Household Profile by Reception Method, July 2025



Source: Indecon Analysis of TAM Ireland/Nielsen Data, National, TV Households, Reception Method, July 2025 (https://www.tamireland.ie/universes/)

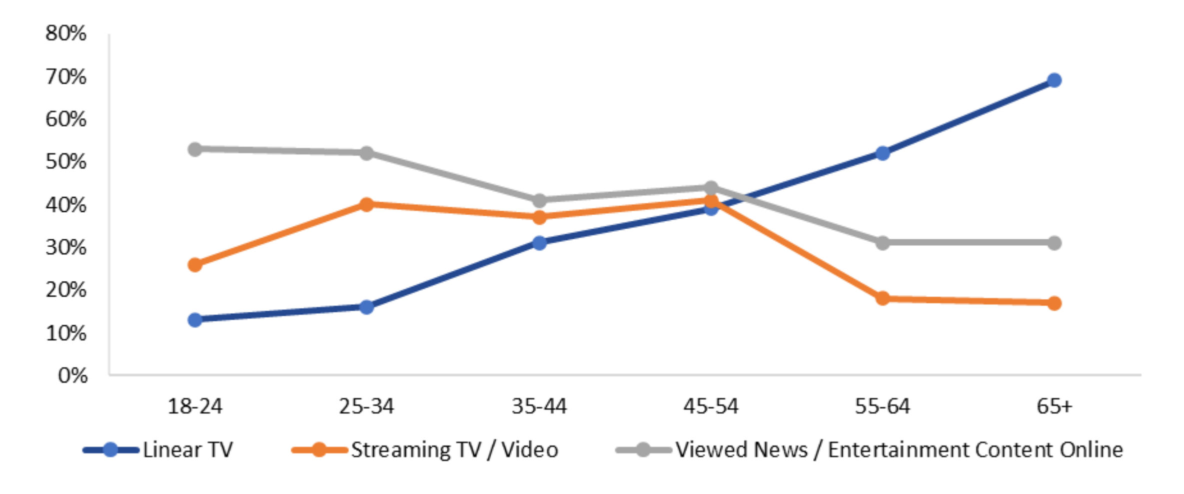
Note: Reception Method refers to the presence of specific reception technologies within households and is not mutually exclusive

Media use is increasingly fragmented across varying platforms, devices and formats. On-demand media platforms have grown rapidly in recent years, supported by the widespread adoption of smart TVs and mobile devices. Recent research commissioned by Coimisiún na Meán (November 2025) shows that younger audiences overwhelmingly prefer on-demand platforms, while older audiences continue to remain more engaged with traditional, linear formats (e.g., television).[11] This trend is evident in the figure below. However, research from the UK, which is discussed further in Section 3.3 finds that even among older audiences, viewing habits are evolving, with a gradual shift towards online news consumption, indicating that age alone might no longer be a reliable predictor of traditional news consumption.

The high usage of online media is also dominated by short-form video, impacting the type of content different audiences desire. Without innovation, linear broadcasting risks becoming irrelevant to the new generation. It therefore remains uncertain whether these viewing patterns reflect temporary age effects where preferences change with life stage, or longer-term cohort effects that will persist over time. The adoption of streaming by over 35-year-olds (mainly 35-to-54-year-olds, but also to a lesser extent 55+ year olds) suggests this is not just a life-stage trend. If this is the case, a significantly greater shift away from linear broadcasting can be expected in the years ahead.

[11] Commissioned by An Coimisiún, Red C conducted a nationally representative study of media usage and audience attitudes in Ireland. The "Media Nations: Screens, Streams and Airwaves" report explores Ireland's media consumption habits and perspectives in November 2025.

Figure 2.15: Daily Usage of Streaming, Linear and Online Content, 2025

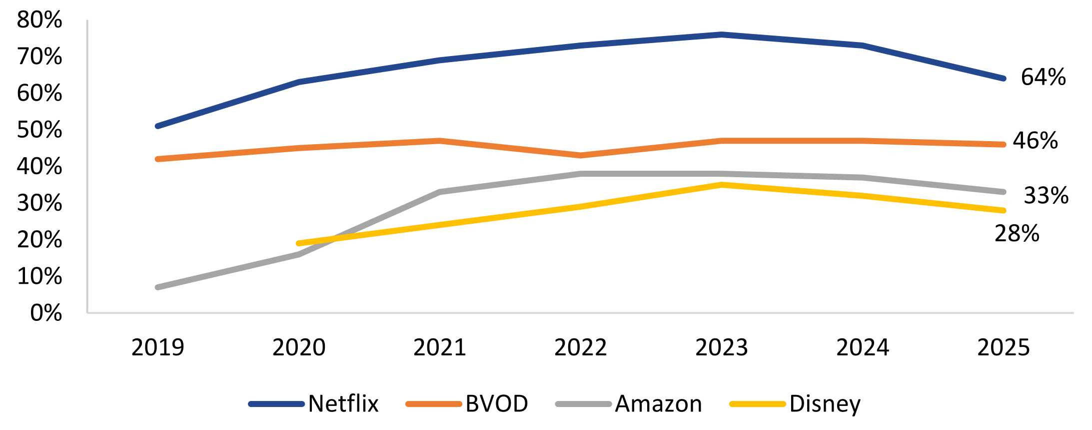


Source: Red C Media Nation: Screens, Streams and Airwaves Report, Media Habits past 7 Days, All Persons 18+ in the ROI, November 2025

In addition, the Red C report found that parents prefer on-demand services compared to linear platforms, as many believe that these services offer better content for their children. Therefore, children of today are likely watching more content through on-demand platforms than linear channels. Thus, the future of linear TV depends on whether the youth of today (and the youth of the future) continue to prefer on-demand platforms to linear TV.

The next figure depicts the evolution of audiovisual streaming services in Ireland, measured by the percentage of Irish adults using the individual services. Netflix, a popular subscription-based video-on-demand service (SVOD), maintains the highest level of usage throughout, peaking around 2023 before easing slightly in 2024. However, in 2025, the usage of Netflix fell from 73% to 64%. Amazon Prime Video also recorded substantial growth, rising sharply in 2022 and stabilising thereafter. Similarly, Disney+ has seen a rapid increase in adoption between 2019 and 2022, before flattening out and slightly declining. PSMs have also developed Broadcast video-on-demand services (BVODs), such as RTÉ Player or TG4 Player, which have also grown rapidly. Total BVOD usage (including all catch-up TV services such as RTÉ Player, All4, Virgin and Sky On Demand, etc.) remains relatively high and stable, fluctuating within a narrow band just below 50%.

Figure 2.16: Use of Streaming Services (% of Adults), 2019-2025



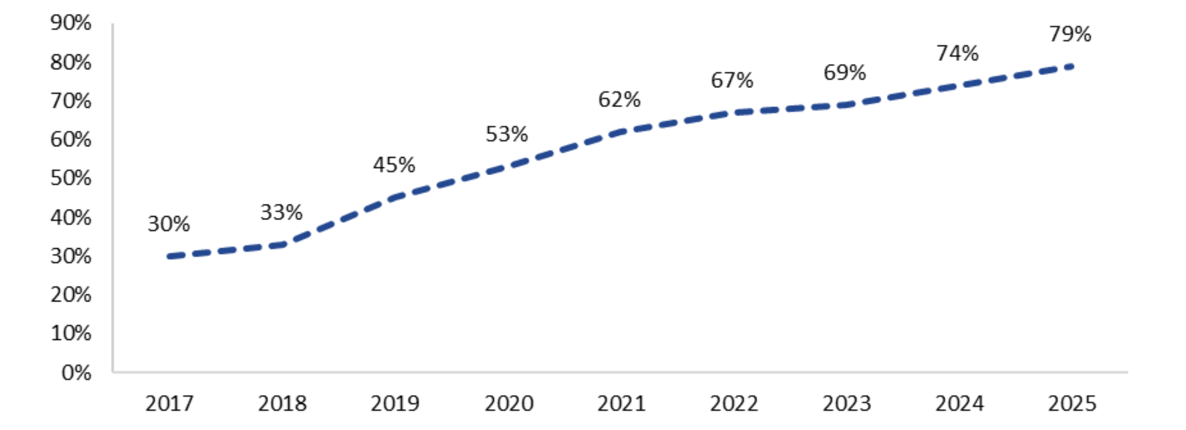
Source: Indecon Analysis of Data Published in B&A Techscape Reports 2020, 2021, 2022, 2023, 2024 and 2025, Data based on All Adults (16+). Respondents answered the following question: Q3 Which of these do you do nowadays anywhere ...

Many new global competitors such as those providing SVOD services are investing significantly in their content and technology to gain market share but are not subject to the same accountability as the traditional media industry. While VODs established in Europe are regulated under the EU Audiovisual Media Services Directive (AVMSD), licensed broadcasters and Irish PSM are subject to more programme content obligations than VOD providers.[12] To stay relevant and compete with SVODs, broadcasters need to create high-quality content that is relevant to the Irish audience. Irish stakeholders have highlighted the importance of sustaining locally produced, high-quality programming and journalism that resonates strongly with Irish audiences, noting that such content plays a key role in supporting a vibrant creative economy and reflecting Ireland's culture, stories, and society.

Smart TVs have become especially prevalent in Irish households, which has facilitated greater access to streaming platforms. Depicted in the figure below, TAM Ireland data shows that in 2025, the presence of smart TVs has increased substantially over the past number of years, with 79% of TV Households owning a smart TV, highlighting that IP connectivity is now near universal across Ireland (74% of TV households have a smart TV connected to the Internet). Red C research (2025) finds that access to smart TVs is lower for older cohorts (65+ years old), households in Connacht and Ulster, DE social grades and single-person households. Therefore, a complete digitalisation of the TV sector could result in the unintentional exclusion of households, unless conscious assistance is carried out to ensure these households have equal access to information, news and entertainment.

[12] The AVMSD provides for minimum standards and obligations that video-on demand providers and television broadcasters must adhere to in a variety of areas, including child safety, the accessibility of their services, and the prohibition of content that incites hatred. The Online Safety and Media Regulation Act established the regulatory framework for these services and for radio broadcasters. Source: https://www.cnam.ie/revised-media-services-codes-and-rules-published/

Figure 2.17: Presence of Smart TVs in TV Households



Source: TAM Ireland/Nielsen Media Ireland, Establishment Survey Data, National, Base: TV Households, January 2014 - July 2025

Broadcasters across Europe are also adapting to this increasingly competitive and digital environment. Some have begun launching Free Ad-supported Streaming Television (FAST) channels as a complement to their existing offerings. FAST services, which are linear, ad-supported channels delivered over digital networks, remain more established in the United States but have grown quickly in Europe. Although they accounted for less than 3% of total AV viewing in Q1 2024, usage increased by nearly 20 percentage points since Q1 2023, supported by rising adoption of connected and smart TVs.[13] These developments introduce another form of competition for Irish media broadcasters, as FAST services remain largely unregulated in Europe.

Red C research also highlights that a "Dodgy Box" is present in approximately 10% of Irish households. While low, it is not insignificant. A dodgy box is a device which provides users with an illegal streaming service. However, their future existence is not ensured, as the Federation Against Copyright Theft (FACT) has been working with broadcasters and law enforcement to clamp down on the illegal Internet Protocol TV (IPTV) providers.[14] Sky Ireland has warned dodgy-box users of the potential negative consequences they could face if they are caught utilising the illegal devices, shifting the responsibility onto the households, as well as the provider.[15]

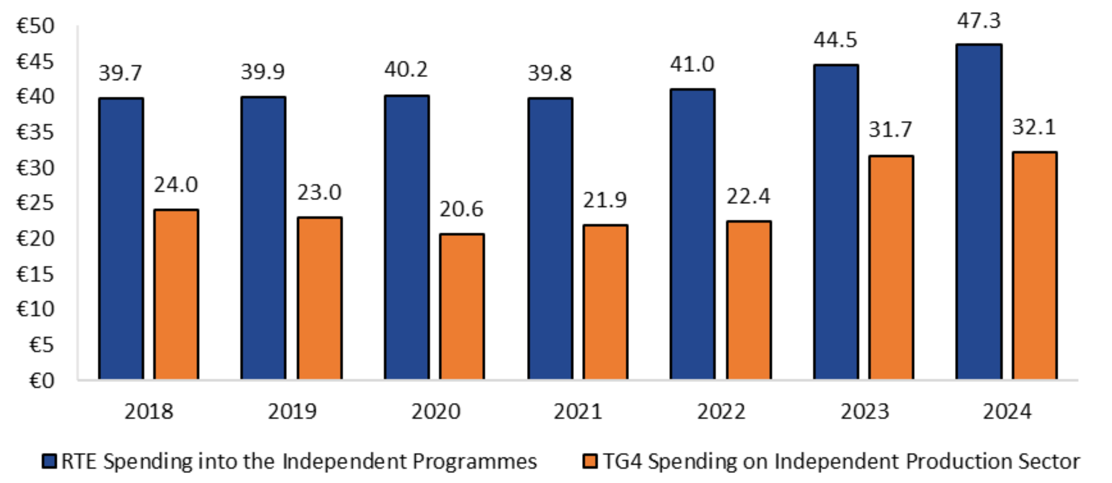
The must-carry rule under Section 77 requires cable and satellite operators to provide certain public service or free-to-air TV channels, promoting universal access, but the rise of smart TVs, video-on-demand services, and web-TV-only households challenges its relevance because audiences increasingly access content outside traditional broadcast distribution, thereby reducing the prominence of national broadcasters .[16] To respond to the increased competition in the TV/audiovisual sector, traditional broadcasters are expanding their digital presence through BVOD services and third-party platforms such as YouTube in an effort to reach younger audiences and mitigate declines in linear viewing, blurring the boundaries between broadcast and online media. However, streaming of public service media in Ireland, while increasing, remains modest: in 2025, streaming via BVOD represented only 7% of viewing for RTÉ and 3% for TG4.[17] While the use of catch-

[13] Source: EBU's FAST Channels in Europe, 2024
[14] Source: https://www.rte.ie/news/2025/0217/1497199-dodgy-box-legal-notice/
[15] Source: https://www.newstalk.com/podcasts/highlights-from-newstalk-breakfast/sky-ireland-issues-warning-of-consequences-for-up-to-400000-dodgy-box-users
[16] Source: https://www.irishstatutebook.ie/eli/2009/act/18/section/77/enacted/en/html
[17] Source: Coimisiún na Meán's 5-year Review of Public Funding for Public Service Media, 2025

up TV services is reasonably high overall, streaming via the Players still accounts for a small proportion of overall viewing for PSM broadcasters. This is lower than that for UK broadcasters, where BBC's share of TV consumption via streaming is over 20%.[18]

In ensuring that Irish audiences are appropriately represented, it is useful to consider commissioning with the Irish independent production sector. Figure 2.18 shows annual spending on Irish production commissioned by RTÉ and TG4. RTÉ's expenditure on independent programmes has been on a modest upward trend and now amounts to roughly €47 million per year. TG4's investment, while smaller given its scale, has also increased steadily as its funding has grown, rising from around €24 million in 2018 to over €30 million in 2024.

Figure 2.18: PSM Commissions to Independent Production Sector (€m), 2018 - 2024



Source: TG4 Annual Reports and RTÉ's Independent Productions Annual Reports

The table below provides an estimate of the size of the independent broadcasting market, licensed under Section 70 (the national Television Programme Service Contract), Section 71 (Content Provision Contracts) and Section 72 (Community Content Provision Contracts). These licenses are described in further detail in Section 4.3. Based on the financial information available at the time of this review, the combined turnover of independent TV broadcasters in Ireland was €110 million in 2023, rising to €117 million in 2024. This should be interpreted as a lower-bound estimate of the overall Section 70/Section 71/Section 72 TV segment.

Table 2.2 Estimated Size of Independent TV Broadcasters in Ireland

	2023	**2024**
Turnover	€110m	€117m

Source: Coimisiún na Meán.
Notes: Lower bound estimate based on data provided.

[18] Derived from Figure 16 in Ofcom's Media Nations 2025 report: https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2025/media-nations-2025-uk-report.pdf?v=401287

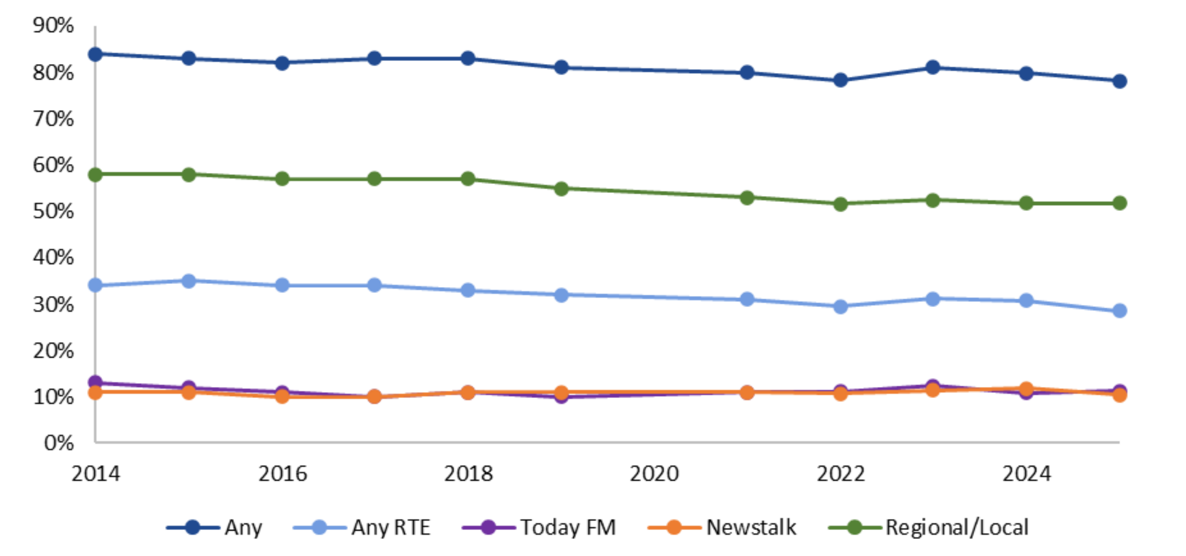
Audio Market

In Ireland, radio remains extremely popular across all age groups and is highly consumed, with adult radio listening averaging almost four hours per day (220 minutes), and the youth (15- to 34-year-olds) listening to almost three hours per day (162 minutes) on average in 2025.[19] Even though the level of listening to streamed music is rising in Ireland, radio has been stable in terms of consumption, market share and advertising.

As shown in Figure 2.19, listenership has remained high over the past decade, with only a slight reduction in average weekday listenership from approximately 84% in 2014 to 78% in 2025, indicating that radio continues to retain a strong daily reach. Within this aggregate, the main categories follow broadly similar patterns. Regional and local services show only a moderate easing from around 58% to 52%, and RTÉ declines from 34% to 29% between 2014 and 2025. Today FM and Newstalk each average around 10%, with only limited year-to-year movements.

Research from the Red C report (2025) noted that daily and weekly listenership is considerably lower for those living in Dublin, where households are also less likely to own a traditional radio set compared to other parts of the country.

Figure 2.19: Average Weekday Yesterday Listenership



Source: JNLR Listenership Data, Daily Reach - Average Weekday "Yesterday" Listenership, National, All Adults (15+), 2014 – 2025

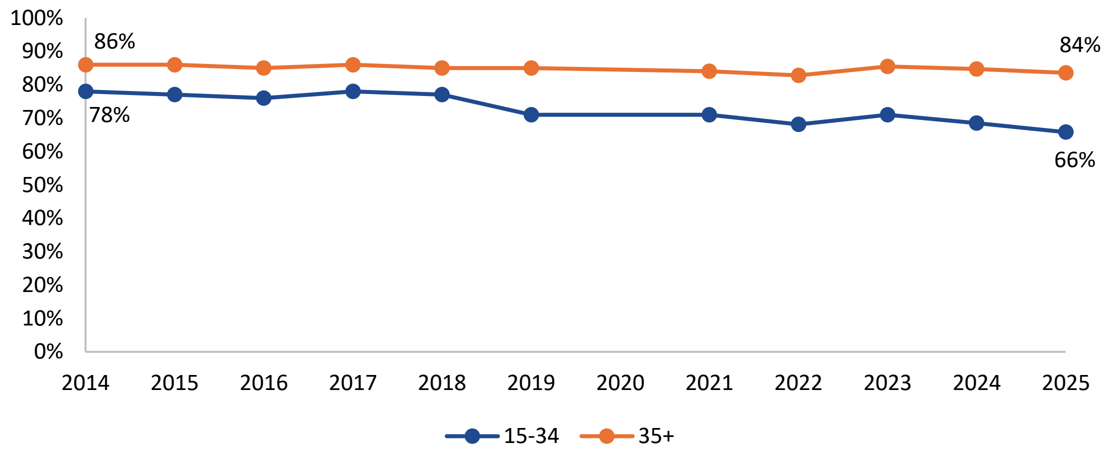
Notes: The average weekday yesterday listenership refers to the number of listeners who tune into the radio every weekday.

When JNLR data are disaggregated by age cohort, a clear generational gradient emerges. Radio reach and consumption have declined among younger audiences, although average weekly listenership remains comparatively high even within these cohorts. As illustrated in Figure 2.20, listenership has been more stable among those aged 35+ than among 15–34-year-olds. Weekly reach among the younger cohort fell from 78% in 2014 to 69% in 2025.

[19] During prime 7am to 7pm time. Source: JNLR Radio Listenership Press Release 2026. https://www.ipsosbanda.ie/wp-content/uploads/2026/02/JNLR-2025-4-FEB26_Press-Release-120226.pdf

Notwithstanding this decline, radio consumption in Ireland remains significantly above the EU average. In 2025, average daily listening in Ireland stood at 220 minutes per person, compared with approximately 130 minutes across Europe.[20] This pattern also holds for younger cohorts: 15–24-year-olds in Ireland averaged 150 minutes per person per day in 2025, exceeding the European average for all age groups.

Figure 2.20: Average Weekday Yesterday Listenership by Age Cohort

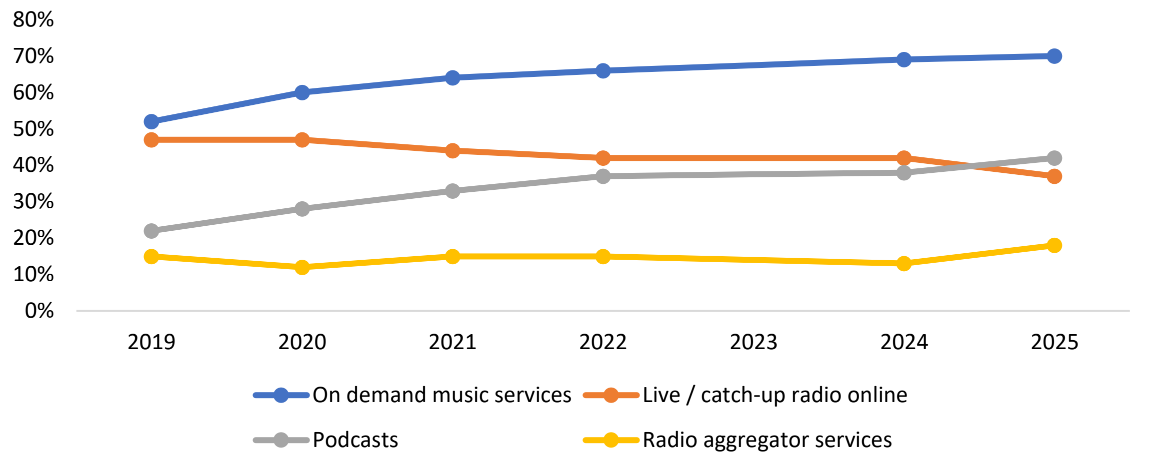


Source: JNLR Listenership Data, Daily Reach - Average Weekday "Yesterday" Listenership, National, All Adults (15+), 2014 – 2025, By Age Cohort

The reduction in radio listening experienced in Ireland corresponds with a rise in on-demand media services, such as podcasts. The Digital News Report 2024 found that podcasts are very popular in Ireland, with an estimated 43% of adults saying they had listened to a podcast (not necessarily a news or current affairs podcast) over the previous month, compared with just 31% and 37% in the UK and EU, respectively. This is confirmed by Listen Up Ireland data.[21] As reported in the figure below, podcast listening has increased to 42% by 2025, overtaking live radio station listening (37%).

[20] Numbers from EBU (https://www.redtech.pro/ebu-radio-audience-trends-2025/)
[21] Source: Listen Up Ireland 2025 Report - https://iabireland.ie/wp-content/uploads/2025/04/IAB-Ireland-REDC-Listen-Up-Ireland-2025-FINAL.pdf

Figure 2.21: Weekly Content Consumed by Digital Audio Users



Source: IAB Ireland / RED C Research, Listen Up Ireland 2025 – Irish Research into Digital Audio Consumption & Behaviour (Wave 6; fieldwork 14–19 Feb 2025). Chart: "Weekly Digital Audio Consumption x Digital Audio Channel Over Time". Base: All digital audio consumers aged 16+ (n=820).

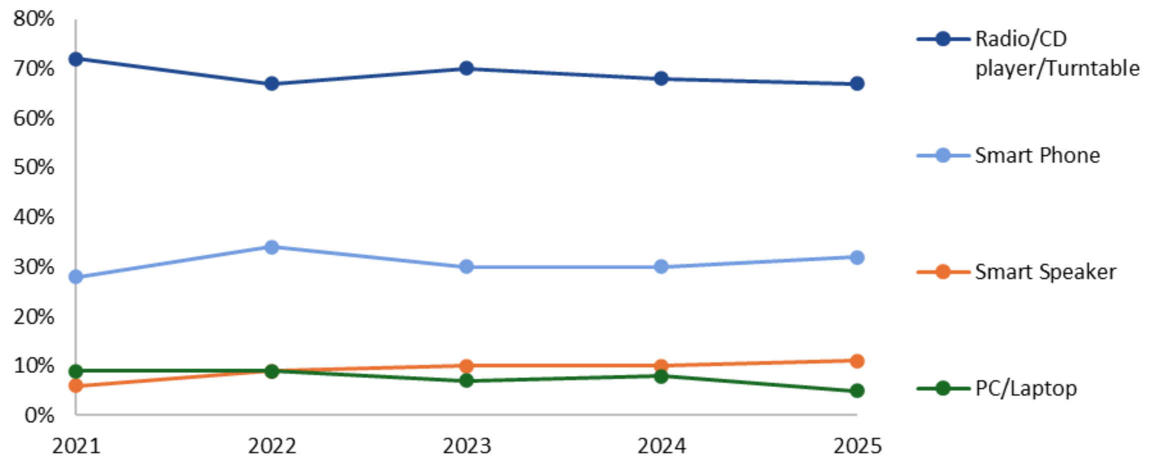
Notes: Research changed to 16+ in 2025 (previously 18+). Year 2023 is not shown in the source trend series. Live and catch-up radio were previously asked separately and are merged in 2025.

Like smart TVs, there has also been growth of smart speakers over time, especially among the younger cohorts, which likely facilitates listening to the radio by younger audiences who may not own or be acquainted with FM radio receivers. As seen in the JNLR data, 32% of under-34s own a traditional radio set, while over 60% have a smart speaker.

While there is still a high number of traditional radios in households, the ownership of smart speakers has edged slightly ahead, indicating a clear shift and gradual transition toward digital listening. JNLR data shows that smart-speaker listening continued to expand steadily in 2025, with 11% of adults using a smart speaker to listen to audio on an average day.[22] This is shown in the figure below.

[22] Source: 2025 JNLR Irish Audio Report.

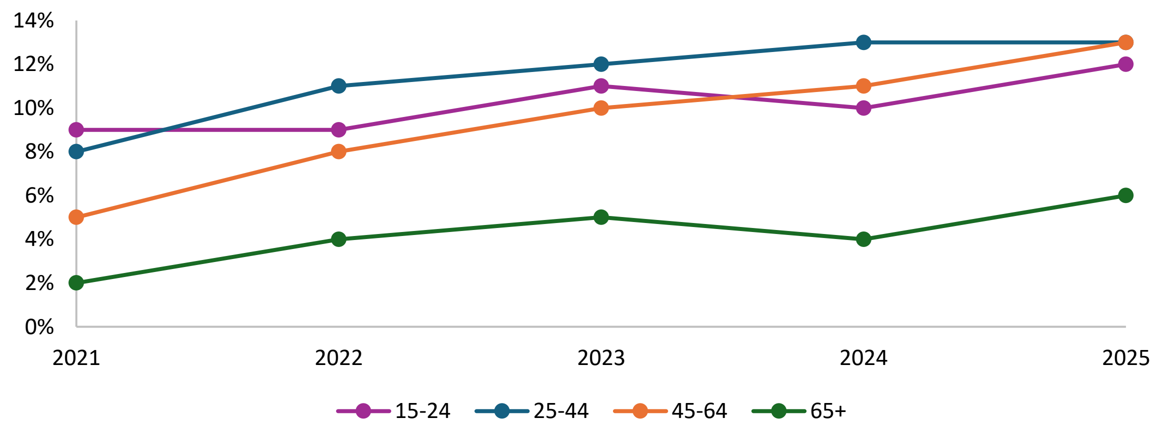
Figure 2.22: Listening by Device Trend Over Time



Source: The Irish Audio Report 2025 (Radiocentre Ireland) using JNLR Data (Listening by Device, National, All Adults (15+))

The data also shows that smart-speaker use, while growing over time across age groups, is somewhat age-dependent: daily use is 13% among 25-44-year-olds and 45-64-year-olds compared with just 4% among those aged 65+ (see Figure 2.23).

Figure 2.23: Daily Audio Activity on Smart Speaker by Age Over Time



Source: The Irish Audio Report 2025 (Radiocentre Ireland) using JNLR Data (Listening by Device, National, All Adults (15+))

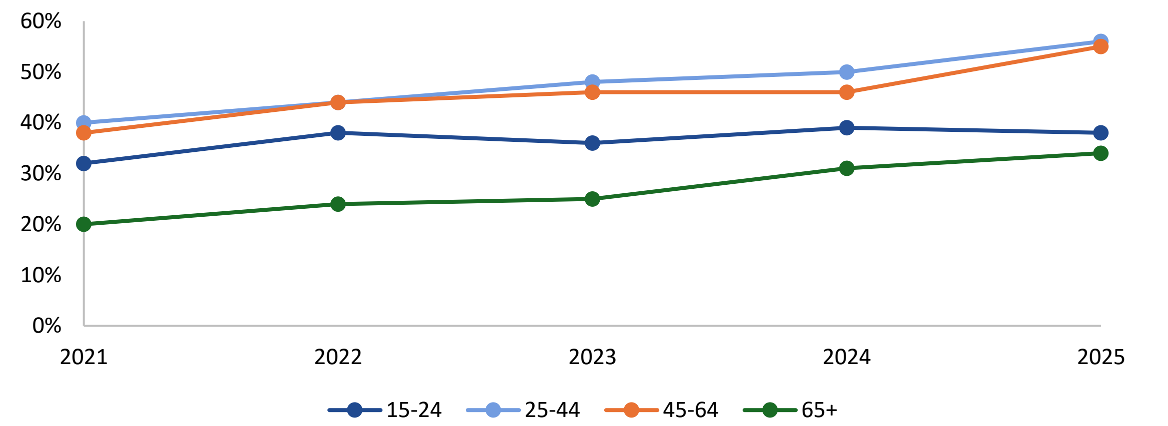
Recent research commissioned by An Coimisiún also found that while 51% of households had at least one traditional radio set in their house, 55% of households had at least one smart or wireless speaker. Smart speakers have therefore overtaken traditional radio sets in Irish households.[23]

[23] Source: Red C Media Usage report, October 2025

The rise in smart speakers is likely to favour the listenership of radio, as many households listen to live radio on their smart speaker. However, as with smart TVs, discoverability is an emerging issue: the wide range of audio options can dilute prominence for broadcasters, and voice-activated interfaces may pose accessibility challenges for some users. The Red C report (November 2025) further found that 34% of daily radio listeners do not have a traditional radio set or stereo at home. This implies reliance on alternative devices (e.g. smart speakers or smartphones) or listening in other locations, such as in-car or at work.

Listening remains primarily home-based, but in-car listening has steadily increased in recent years, particularly among those in employment.[24] The Irish Audio Report 2025 finds that over two-thirds (67%) of the population listen to audio content at home, while 49% listen in the car. Although home remains the primary listening location across all age cohorts, in-car listening has increased across all age groups, as depicted in the figure below.

Figure 2.24: Listening in Car by Age Cohort



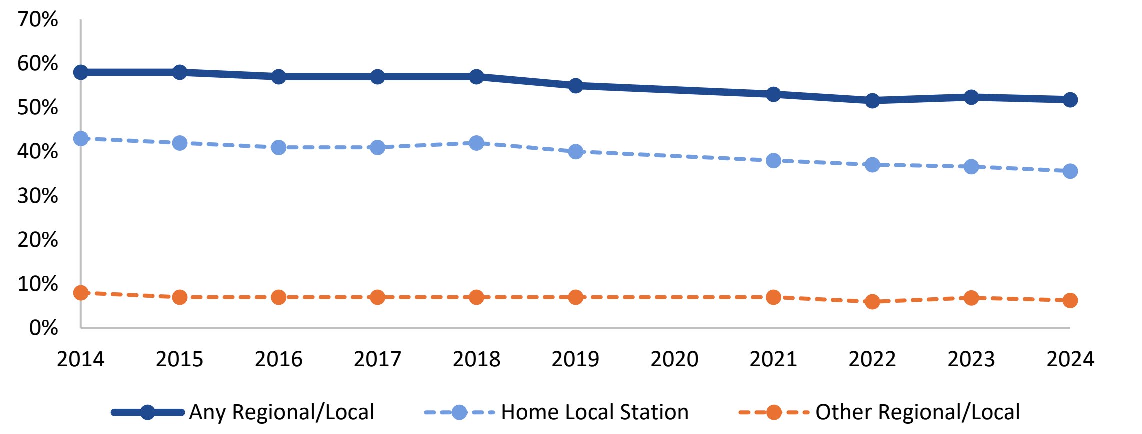
Source: The Irish Audio Report 2025 (Radiocentre Ireland) using JNLR Data (Listening by Location, National, All Adults (15+))

The Irish Audio Report 2025 finds that listening patterns differ by format. On-demand audio is typically consumed more intentionally but for shorter durations, whereas radio tends to attract longer, more passive listening. These behavioural differences may have implications for advertising revenues, as advertisers may place greater value on audiences who are actively engaged with content.

Regional and local radio remains a strong feature of the Irish market (see Figure 2.19), including among younger listeners, highlighting the continued relevance of locally driven content. However, listenership varies markedly within this segment: as shown in the figure below, average listenership for local home stations was 36% in 2024, compared with just 6% for other regional or local stations.

[24] Research from Onic suggests that hybrid working patterns are reshaping commuting behaviour: radio listeners are most likely to be driving while consuming Onic brands (e.g. FM104, Dublin's Q102). The morning commute remains concentrated and radio-dominated, whereas the evening commute has become more fragmented, with greater substitution towards music streaming and podcasts.

Figure 2.25: Average Weekday Yesterday Listenership by Local and Regional Radio Breakout



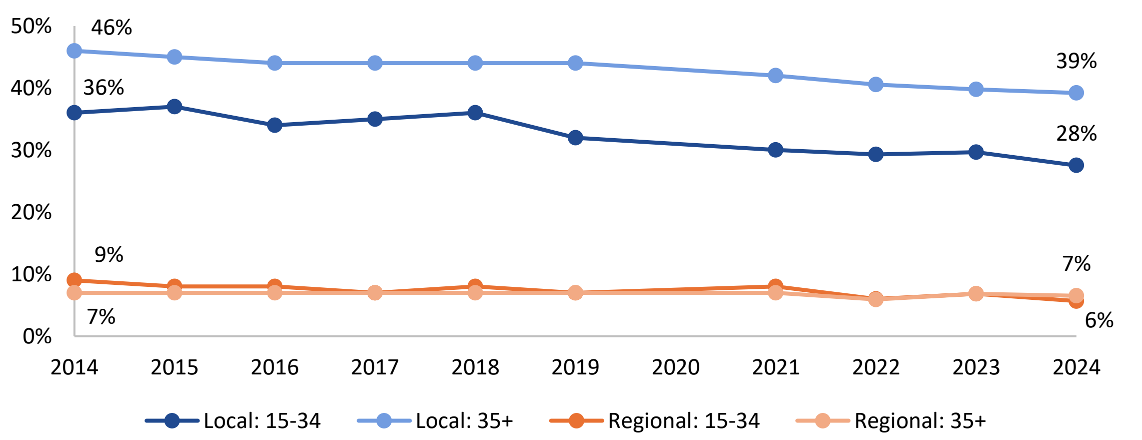
Source: JNLR Listenership Data, Daily Reach - Average Weekday "Yesterday" Listenership, National, All Adults (15+), 2014 – 2025

Note: Breakout data on Home Local Station and other Regional/Local station is only available until 2024

Figure 2.26 shows a clear and consistent distinction between local home stations and regional stations in both scale and audience profile. Local stations attract substantially higher listenership across both cohorts throughout the period and skew older: in every year shown, listenership among those aged 35+ exceeds that of 15–34-year-olds (39% vs 28% in 2024).

Regional stations operate at a much smaller scale. Historically, listenership has been slightly higher among 15–34-year-olds than among those aged 35+, but the differential is modest and has decreased over time. Overall, while regional services may historically target younger audiences, local stations command significantly larger audiences across both age groups, particularly among older listeners.

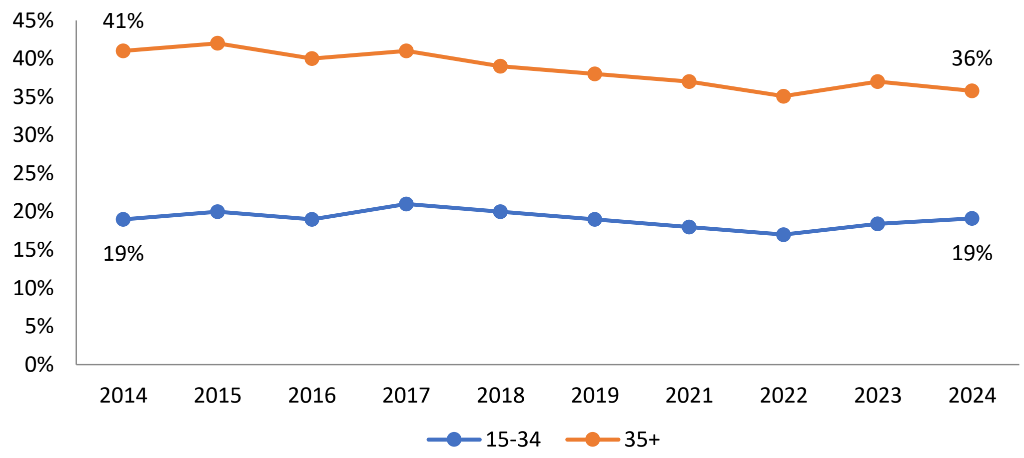
Figure 2.26: Average Weekday Yesterday Listenership by Age Cohort for Regional and Local Radio



Source: JNLR Listenership Data, Daily Reach - Average Weekday "Yesterday" Listenership, National, All Adults (15+), 2014 – 2025

Similar to local stations, as depicted in the figure below, RTÉ listenership exhibits a pronounced age gradient, with significantly higher listenership among those aged 35+ than among 15–34-year-olds. RTÉ has also experienced a sharper decline in listenership among the older cohort, while listenership among younger audiences has remained relatively stable, albeit at a lower level.

Figure 2.27: Average Weekday Yesterday Listenership by Age Cohort for RTÉ



Source: JNLR Listenership Data, Daily Reach - Average Weekday "Yesterday" Listenership, National, All Adults (15+), 2014 – 2025

Community radio is also widely appreciated in Ireland, according to research conducted by Amárach in 2024.[25] Although the research found that community radio plays an important role in keeping the community connected and informed, most community radio listeners tune in infrequently (less than weekly). The Community radio sector operates on a not-for-profit basis with the objective of delivering social benefits (as set out in the Social Benefit Framework[26]) to geographical areas or communities of interest. Community radio is not only about capturing an audience but is about engaging and amplifying the voice of diverse groups, and creating opportunities for volunteers to participate directly, including taking on roles in managing and running the station. This not-for-profit structure and focus on community ownership make the community radio sector distinct from local commercial entities.

Though the Community Radio sector has long demonstrated resilience, community stations' core activities tend to rely on annual grant applications, which provide limited visibility over future funding and constrain financial planning. This, in turn, hinders the retention of skilled staff and constrains their capacity for forward planning and long-term development. It is likely to be more challenging for small local and community stations to remain in operation, as they will be more exposed and vulnerable to the increased inflationary environment, affecting their sustainability. While many stations have already made efficiencies, some stations might face greater challenges maintaining programme quality in the future, and for Community stations, offering social benefit to the Community they serve. Even large organisations that have been able to invest in the technology required to keep up with the changing media landscape had concerns over their long-term profitability, as all radio services face increased competition from social media for advertising

[25] Source: Community Radio Research, Amárach & CRAOL, 2024.
[26] Source: Community Radio Delivering Social Benefit, BAI, 2020.

revenue. Some stakeholders noted that they have had to use their overdraft to continue operation, an unsustainable practice that highlights the dire need for reform in the sector.

Table 2.3 shows the estimated size of commercial radio in Ireland as measured by total revenues, which stands just below €141 million in 2024. Preliminary estimates for 2025 suggest revenue of €134 million in 2025.

Table 2.3: Estimated Size of Commercial Radio Providers (€ Million)

	2024	2025*
Revenue	140.6	134.4

Source: Coimisiún na Meán.
Notes: Lower bound estimate based on data provided. The data for 2025 are estimates based on actual data between January and August, extrapolated to the full year.

Estimates for the size of community radio are presented in Table 2.4. This suggests total revenues of approximately €4.3 million each year in 2023 and 2024.

Table 2.4: Estimated Size of Community Radio Providers (€ Million)

	2023	2024
Revenue	4.3	4.3

Source: Coimisiún na Meán.
Notes: Lower bound estimate based on data provided. Excludes UCC as a breakdown of activity isolating revenue from radio was not available.

In Ireland, FM radio remains the dominant distribution platform, accounting for 72.6% reach, and is close to full capacity. This heavy reliance on analogue broadcasting limits opportunities for new entrants or service expansion within the traditional spectrum-based model. Across Europe, Digital Audio Broadcasting (DAB) has developed as a complementary digital terrestrial broadcast platform, enabling additional station capacity and enhanced audio features. While both FM and DAB use radio spectrum to transmit audio, FM is analogue whereas DAB transmits digitally encoded signals.

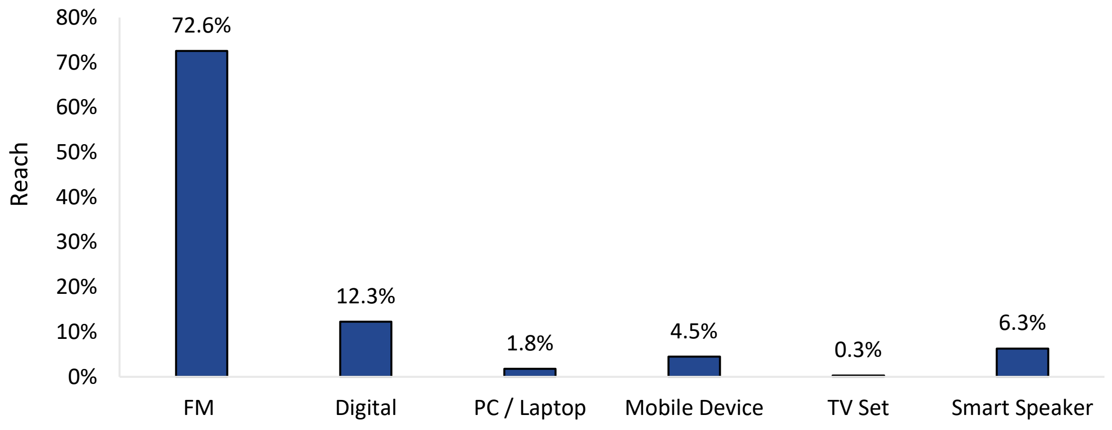
However, the figure below shows that listening via connected devices (IP-based distribution) is also material and growing. JNLR data indicates that 12.3% of adults in Ireland now access radio through digital devices, including 4.5% via mobile devices and 6.3% via smart speakers, while 1.8% listen via PC/laptop. Unlike DAB, these platforms rely on broadband or mobile data networks rather than broadcast spectrum.

This connected-device share is likely to increase over the next 3–5 years as smart-speaker ownership in Ireland has risen sharply (from 11% in 2018 to 44% in 2025),[27] a trend typically associated with sustained growth in IP-based listening. In parallel, EU end-user equipment rules under the European Electronic Communications Code require all new M-category vehicles placed on the EU market since

[27] JNLR—Irish Audio Report 2024 (https://www.adworld.ie/wp-content/uploads/2024/11/The%20Irish%20Audio%20Report%202024%20Revised.pdf) & 2025 (https://cdn.prod.website-files.com/622b78ab1e61497a953bc219/6918759bc42440b0dfb48ca6_The%20Irish%20Audio%20Report%202025.pdf)

21 December 2020 to include digital terrestrial radio reception (e.g. DAB+), which may further support the evolution of digital broadcast listening in the in-car environment.

Figure 2.28: Radio Market Reach by Type of Device, 2024



Source: JNLR Listenership Data, Reach by Device Weekday Listener Profile, National, Weekday, All Adults (15+), Ipsos B&A Research, 2024

2.4 Resourcing Considerations

In analysing sectoral trends and dynamics, it is also important to consider resourcing factors, including current and future skills requirements, as well as the revenue streams and expenditure profiles of participants in the Irish independent audiovisual sector.

Skills

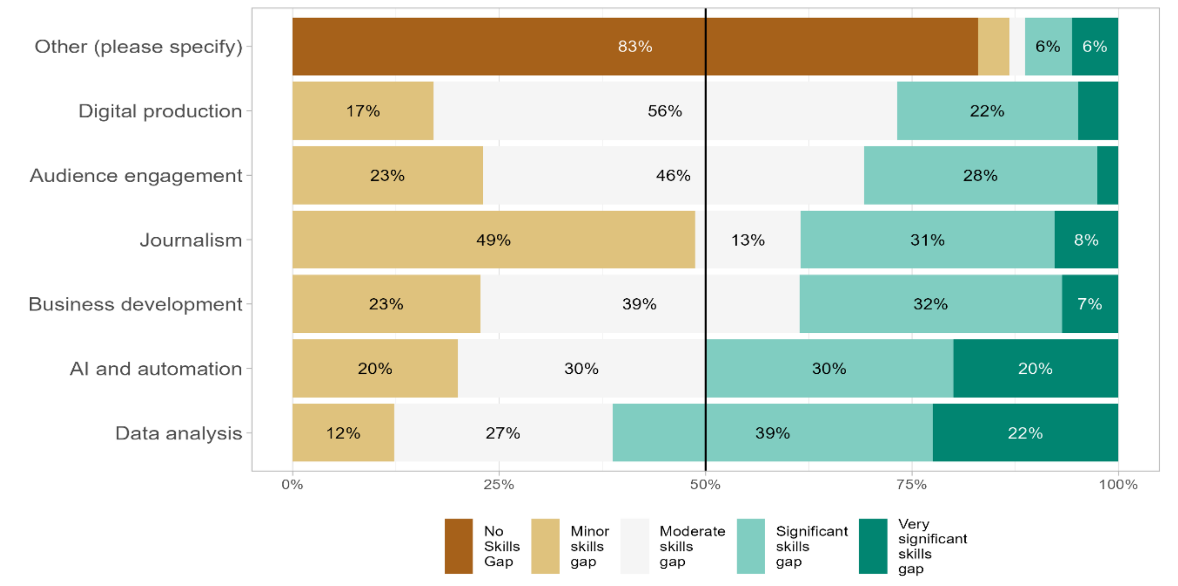
As part of an assessment of the current structure and dynamics of the sector, it is useful to consider skills and human resource characteristics. The audiovisual sector is a key contributor to employment in Ireland.[28] Specifically, between 2021 and 2023, the sector supported 10,450 full-time employees directly and 15,899 in total, highlighting its significant role across the economy. Ireland's audiovisual sector has a well-qualified, rapidly growing workforce, which is underpinned by effective training initiatives; however, Fís Éireann/Screen Ireland found that there are shortages in senior roles across production departments. The audiovisual sector also plays a significant role in promoting Irish language, identity, and values through storytelling on screen. Moreover, the depiction of Irish settings, talent, and culture on screen has enhanced the country's appeal as a tourist destination in recent years.

As the sector becomes more digitalised, there is a growing need for ongoing professional development to keep up with technological advancements. The Indecon survey highlighted that the most significant or very significant skill gaps are in areas related to technology, specifically for data analysis (61%) and AI and automation (50%), as illustrated in Figure 2.29. This trend is seen across broadcasters of all maturity, including newer broadcasting services. Further stakeholder engagement revealed that these positions are challenging to fill due to increased competition for talent, not only among media organisations but also from companies outside the media sector. In addition, due to falling and uncertain revenue, many of the broadcasters cannot compete in terms of salary with other organisations.

[28] Source: The Economic and Skills Analysis of the Audiovisual Sector in the Republic of Ireland, Fís Éireann/Screen Ireland, 2025

To provide support for the digital upskilling of the existing workforce and the significant modernisation of infrastructure, technology and digital tools for business development, the recent Digital Transformation Scheme ("DTS"), operated by An Coimisiún in 2025, provides funding to media organisations to innovate and transition to the digital information environment.[29] The first round of the DTS resulted in 58 projects receiving €2.7 million in funding.[30]

Figure 2.29: Survey – Skill Gaps in Organisation

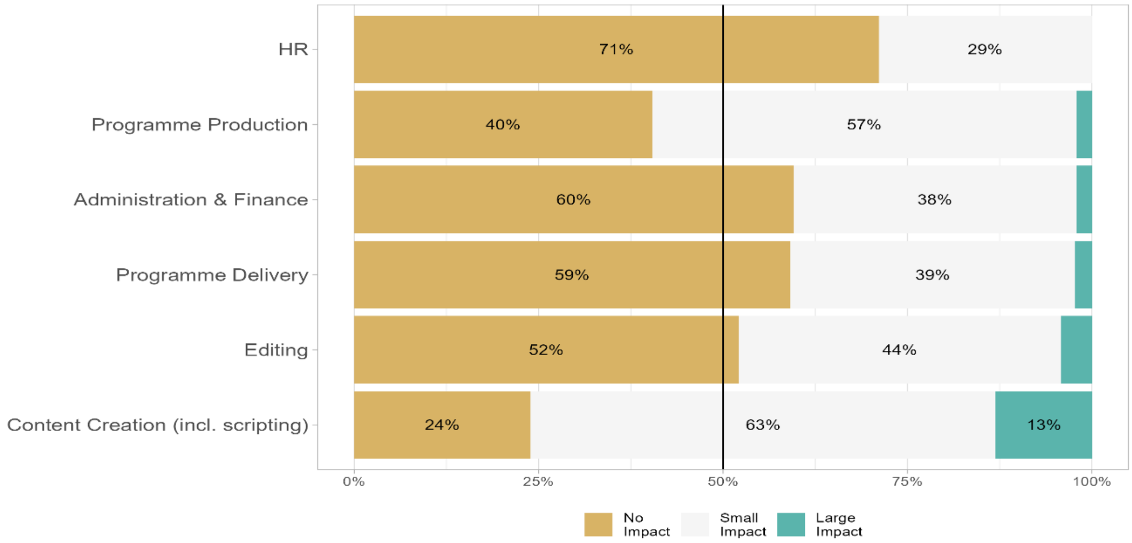


Source: Indecon Survey

According to the survey, the emergence of AI has somewhat impacted broadcasting organisations through their Content Creation (76%) and Programme Production (60%); however, it has largely not impacted activities in HR, Administration and Finance, Programme Delivery or Editing. This is shown in the figure below.

[29] Source: https://www.cnam.ie/industry-and-professionals/media-development/support-funding/digital-transformation-scheme/
[30] Source: https://www.cnam.ie/industry-and-professionals/media-development/support-funding/digital-transformation-scheme/funding-offers-r1/

Figure 2.30: Survey – Impact of AI on Broadcasting Activities



Source: Indecon Survey

The emergence of AI has also created new challenges globally regarding disinformation and misinformation, which some stakeholders suggest will increase the importance of the role of verification and accurate and timely reporting, on all platforms, to mitigate this risk.

Income and Expenditure

An examination of revenue sources and expenditure patterns provides important insight into the current economic structure of the broadcasting sector. Broadcasters can receive significant funding through available funding schemes. Of particular importance is the Sound & Vision Scheme, delivered through the Broadcasting Fund, which represents a central pillar of public support for Irish content. Sound & Vision 4, announced in 2020, has invested over €40 million to support high-quality programming focused on Irish culture, heritage and experience.

In addition, numerous other funding schemes exist for broadcasters, particularly following the release of the Future of Media Commission report (further details on this are provided later in this report), which led to the introduction of new funding schemes. These include the Local Democracy Reporting Scheme, which aims to assist local media organisations in continuing to perform their role in providing accurate, comprehensive and fair coverage of the proceedings of Local Authorities and associated committees by skilled journalists; and the Courts Reporting Scheme, which aims to enhance and promote comprehensive, high-quality and transparent reporting of court proceedings at a local and regional level, promoting public awareness of the rule of law and the administration of justice.

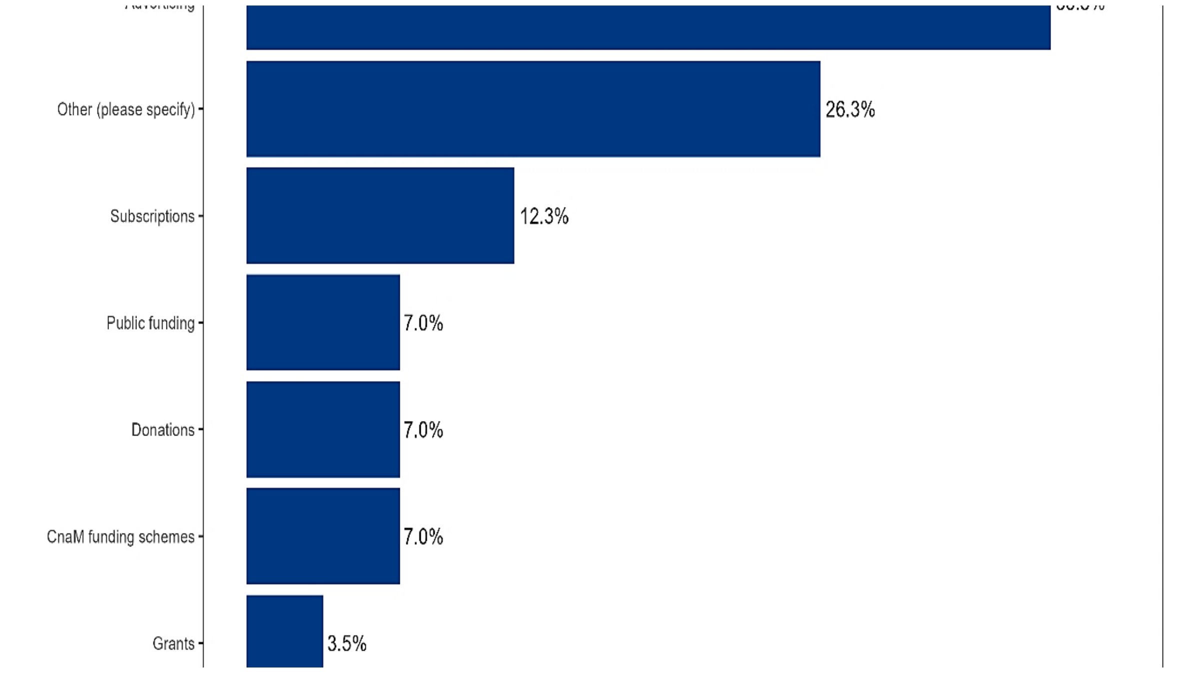
Overall, €6 million in Exchequer funding was allocated for the establishment of the schemes in 2024.[31] As previously discussed, in 2025, the Digital Transformation Scheme also became available, which aims to support innovation and digital transformation in Public Service Content Providers. In 2025, the scheme was allocated total funding of €3 million. The DTS was also informed by the recommendations of the Future of Media Commission.[32]

[31] Source: https://www.gov.ie/en/department-of-culture-communications-and-sport/press-releases/launch-of-local-democracy-and-courts-reporting-schemes/
[32] Source: https://www.cnam.ie/app/uploads/2025/09/20250918_Digital-Transformation-Scheme_FINAL.pdf

Public

Results from our survey of Irish broadcasters (see Figure 2.31) indicate that while broadcasters receive funding from An Coimisiún, advertising remains the dominant income source, identified as the primary revenue stream by 37% of respondents. Subscriptions represent the main source of income for an additional 12% of respondents (these respondents consist of audiovisual platforms such as television broadcasters rather than radio broadcasters). Public funding, donations, and support from An Coimisiún each represent the primary revenue source for approximately 7% of respondents. The "other" revenue option, reported mainly by radio broadcasters, includes various written responses that often combine the other options available or indicate self-funding, accounting for 26% of all respondents.

Figure 2.31: Survey – Primary Source of Revenue



Source: Indecon Survey

However, there has been a decisive shift in advertising revenues away from traditional media towards the technology firms that dominate the digital advertising market. This reduces broadcasters' revenues and increases uncertainty around the sustainability of the sector. For PSM, there is also a growing unsustainability of the TV Licence fees as a source of public funding, as the income from TV licence fees received by RTÉ in 2024 was down €4 million compared to 2023,[33] which was already down €17.3 million compared to 2022.[34] Research from the Red C report (2025) found that younger audiences and those dissatisfied with the offerings from PSM are also less likely to pay their licence fee, which may further affect future licensing revenue.

As highlighted in the table below, in 2024, the media market in Ireland experienced an 8% increase, reaching €1,590 million, which was led by online media.[35] Overall, 2024 was a strong year for radio, with revenue in Ireland growing 1% to €157 million. However, reflective of the rising popularity of digital audio, particularly podcasts, revenue for digital audio grew 14% to €18 million, representing

[33] Source: https://about.rte.ie/wp-content/uploads/2025/10/RTE-Annual-Report-2024-English.pdf
[34] Source: https://about.rte.ie/wp-content/uploads/2025/02/RTE-Annual-Report-2023-English-Final.pdf
[35] Source: Core Outlook 2025

just 10% of overall audio revenue in 2024. Core predicted that Ireland's advertising spend will grow by 7% in 2025, reaching €1,705 million, with digital and out-of-home media expected to remain primary growth drivers, continuing 2024's momentum.

Table 2.5: Advertising Spend in Ireland by Media Type (€ Million)

	2022	2023	2024	2025	% Change (2022 - 2025)
Television	€256.8	€246.5	€254.8	€259.1	0.9%
Cinema	€5.2	€4.6	€5.5	€5.9	13.5%
Online	€835.3	€912.8	€1,011.1	€1,117.2	33.7%
Radio	€152.7	€154.9	€157.0	€159.6	4.5%
Print	€85.0	€76.7	€68.3	€61.9	-27.2%
Out-Of-Home	€70.5	€81.2	€93.3	€101.6	44.1%
Total (in € Millions)	**€1,405.5**	**€1,476.7**	**€1,590.0**	**€1,705.3**	**21.3%**

Source: CORE Outlook 2025
Note: 2025 is a forecast

The dwindling advertising revenue is impacting broadcasters' profitability, especially as this reduction in revenue coincides with an increase in costs of content production, transmission and multi-platform delivery. Ofcom also noted that distribution costs over both broadband and traditional infrastructures like DTT are rising, which could lead to broadcasters reducing the quality of their content to reduce expenditure if costs continue to rise.[36]

According to The Future of Media Consumption Report (2022), most traditional media broadcasters are only beginning their digital shift, and current digital revenues from adverts and subscriptions do not yet offset losses from declining traditional advertising.[37] However, in its 2024 submission to the Committee of Public Accounts, RTÉ notes that non-broadcast digital advertising revenue generated via the RTÉ Player and RTÉ Radio Player has increased.[38] Additionally, new third-party distribution agreements, content partnerships, and live ticketed events have emerged as income streams.

One of the licensing options available to both TV and radio broadcasters is a Section 71 content provision contract. Unlike an FM sound broadcasting licence, a Section 71 contract does not guarantee access to transmission or carriage. As a result, it is subject to fewer obligations. The table below provides an estimate of the turnover and administrative expenses of independent broadcasters licensed under Section 71 that submitted financial data.

In both 2023 and 2024, overall turnover exceeded administrative expenses in aggregate terms. While both turnover and costs increased between the two years, the overall surplus remained broadly stable. These aggregate figures, however, mask significant variation in financial performance across individual broadcasters. In particular, smaller operators are more likely to record negative balances,

[36] Source: Ofcom's Future of TV Distribution, 2024
[37] Source: https://assets.gov.ie/static/documents/report-of-the-future-of-media-commission.pdf
[38] Source: https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/committee_of_public_accounts/submissions/2024/2024-02-28_correspondence-adrian-lynch-acting-director-general-rte-r2030-pac33_en.pdf

reflecting more limited revenue bases and reduced capacity to absorb rising costs, in contrast to larger players with greater scale and diversification. This divergence has implications for the sustainability of smaller services and their ability to invest in digitalisation or additional distribution platforms under current funding models.

Table 2.6: Revenue and costs of Section 71 Content Provision Entities in Ireland

	2023	2024
Turnover	€ 51,436,571	€ 59,065,551
Administrative expenses	€ 43,671,901	€ 51,315,004
Surplus	€ 7,764,670	€ 7,750,547

Source: Coimisiún na Meán.
Notes: Lower bound estimate based on data provided.

2.5 Summary of Key Findings

The key summary findings from this section are as follows:

- Overall, the Indecon survey suggests that the broadcasting market in Ireland is competitive, varied, and mature. However, there is intensifying competition from global platforms for attention and advertising revenues.
- Media use is increasingly fragmented across platforms, devices and formats. There is a growing use of on-demand media compared to linear radio/TV. This is especially prominent amongst the younger cohort.
- The overall size of the media market has increased by over 10% in nominal terms between 2022 and 2025, driven primarily by growth in video-on-demand services, which increased by more than 25%.
- Sky subscription is the dominant platform to watch TV in Ireland. While Irish DTT reliance is low, it is still relevant, especially for the older cohort.
- In 2025, 79% of TV Households own a smart TV, highlighting that IP connectivity is now near universal across Ireland. In addition, smart speakers have overtaken traditional radio sets in Irish households.
- In Ireland, radio remains extremely popular across all age groups and is highly consumed. Regional and local stations continue to account for the largest share of listening, reinforcing the importance of community-driven content in Ireland.
- The Digital News Report 2024 found that podcasts are more popular in Ireland than in the UK and the EU.
- The audiovisual sector is a key contributor to employment and economic activity in Ireland, but as the sector becomes more digitalised, there is a growing need for ongoing professional development to keep up with technological advancements
- The emergence of AI has also created new challenges globally as regards disinformation and misinformation.

3 Future Trends and Potential for Digital Transformation

3.1 Introduction

This chapter is structured in five sections. The next section summarises the potential of digital radio, DAB, in Ireland; Section 3.3 compares the Irish broadcast market with international trends, with specific focus on the UK; Section 3.4 presents our PESTLE analysis; and Section 3.5 concludes with a summary of key findings.

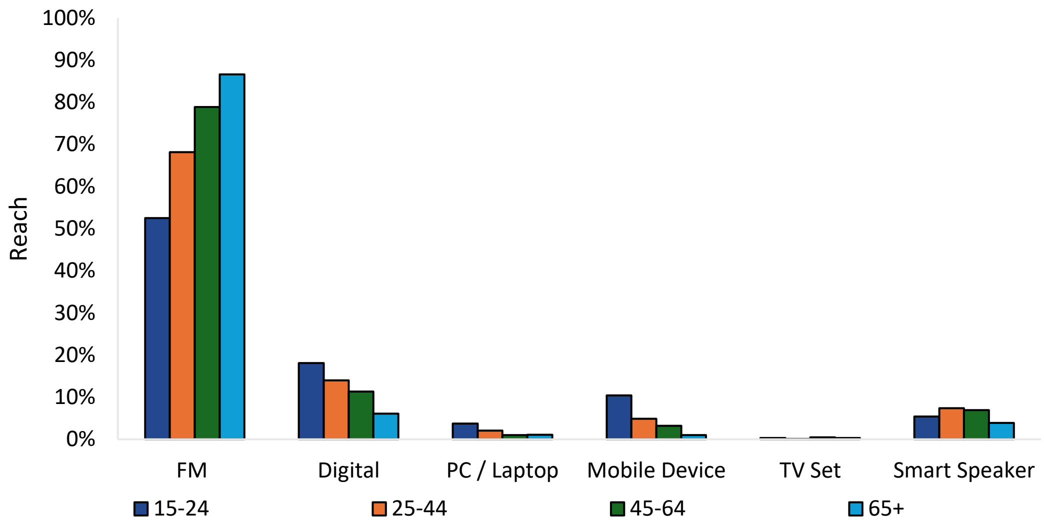
3.2 Potential for Digital Transformation of Radio

In Ireland, the FM radio spectrum is heavily utilised, but some capacity remains. Across Europe, Digital Audio Broadcasting (DAB) has become an established and more spectrum-efficient alternative to FM, enabling a greater number of services and offering digital functionality that goes beyond traditional analogue broadcasting. At EU level, policy has further supported the adoption of digital broadcast radio through the requirement that all new cars sold across Member States include digital radio capability (typically DAB+) as standard.[39] As a result, DAB is now a default feature in most new vehicles across Europe, reinforcing its position as a complement to FM and signals to the accelerating digital adoption in the automotive context. This is particularly significant given that a substantial proportion of radio listening occurs in cars, making in-vehicle access a critical consideration for both broadcasters and listeners.

While RTÉ had previously operated a DAB service in Ireland, offering several digital-only stations, it was discontinued in 2021 due to low listener uptake and high costs.[40] At the time, low take-up was likely driven by limited penetration of digital radios in both households and vehicles.[41] According to the Future of Media Commission Report, in 2019, FM reached 77% of the population while DAB radio reached just 0.5%. However, since then, things have changed, with research commissioned by An Coimisiún in 2025 finding that 19% of those surveyed have a DAB/DAB+ set in the household, while 13% of those who claim to listen to radio daily say they use DAB/DAB+. Notably, younger people are also more likely to have a DAB set, as highlighted in the figure below.

[39] DAB+ is an upgraded version of DAB
[40] Source: RTE News Report on DAB: https://www.rte.ie/news/ireland/2021/0302/1200334-rte-dab-network/
[41] Source: Mediatique Report 2017

Figure 3.1: Radio Market Reach by Type of Device and Age, 2024



Source: JNLR Listenership Data, Reach by Device Weekday Listener Profile, National, Weekday, All Adults (15+), Ipsos B&A Research, 2024

A renewed opportunity for the expansion of DAB radio distribution in Ireland has emerged through recent trial activity. In December 2024, ComReg granted a Test and Trial licence to Foothold Communications to operate a DAB+ multiplex under the *FáilteDAB* trial.[42] The trial was launched in April 2025 for one year and was recently extended for another year. It is designed to test digital radio broadcasting in Ireland using a network of six transmission sites across the Leinster region. *FáilteDAB* invites licensed broadcasters to participate and be part of the multiplex services and encourages listeners to provide feedback on their experiences and views of this trial.

For digital broadcasters to join the trial, they require a content provision contract under Section 71 of the Act.[43] For current FM broadcasters, they can simulcast their FM transmission within their licensed franchise area in the DAB trial under their existing sound broadcasting contract. As of April 2025, 13 applications had been submitted for a total of 26 new radio services, and a small number of existing FM services available in the Dublin area are also being carried on DAB+. The service is delivered free to listeners via transmitted signals, in a manner broadly comparable to analogue FM. Research by Onic indicates that 16% of surveyed listeners were aware of the *FáilteDAB* trial.[44]

Stakeholder engagement undertaken as part of this study indicates broad recognition of DAB+ as the natural digital progression from FM radio broadcasting, offering greater choice, improved audio quality and the potential for more specialised services. In An Coimisiún's recent public call for Expressions of Interest for new commercial sound broadcasting services, which is discussed in more detail in Section 4.5, many broadcasters expressed interest in expanding their existing services through DAB+. However, concerns were raised regarding the potential licensing models, costs and regulatory obligations that might apply if DAB+ were to be established on a permanent basis. Views differed among stakeholders, with some emphasising the importance of regulatory parity between FM and DAB+ services during any transition, while others advocated for lighter-touch, lower-cost and

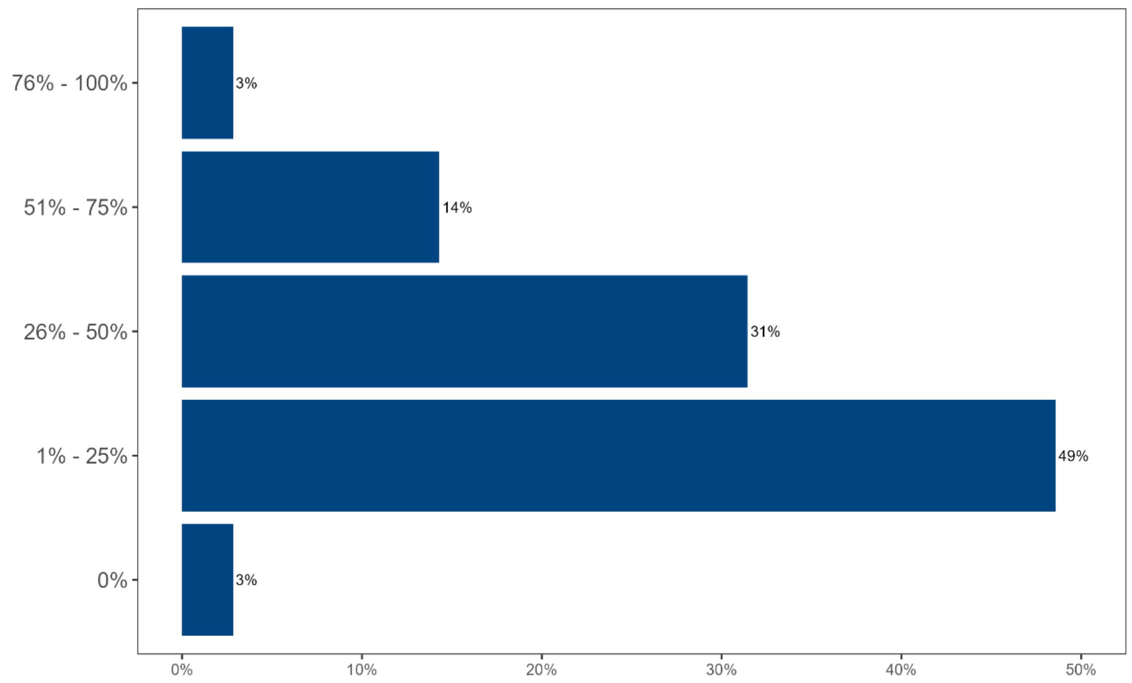
[42] Source: Coimisiún na Meán supports new DAB radio trial - Coimisiún na Meán
[43] Source: Section 71 of the Broadcasting Act 2009.
[44] Source: Sound Affects: The Power of Connection, Onic 2025 Report (https://cdn.prod.website-files.com/622b78ab1e61497a953bc219/69aaa5731bae05f18ee0de78_SA%204%20Event%20Deck%20-%2003.03.26%20edit.pdf)

less prescriptive licensing approaches for DAB+ services, particularly for small-scale or niche DAB+ services.

DAB+ has the potential to address future capacity constraints of the FM band and to support the development of services beyond the simple simulcasting of existing stations, including new formats and niche or genre-specific offerings. Local and community broadcasters may also see opportunities in digital distribution, given DAB's suitability for smaller-scale and specialist services. In addition, audiences in currently underserved areas, particularly outside Dublin and the surrounding counties, may benefit from wider roll-out of DAB+. However, many such broadcasters are likely to face challenges in funding the transmission costs associated with digital distribution under existing funding models, as the costs of implementing and marketing DAB+ can be high.

When asked about the optimal role of DAB within the Irish radio sector, almost half of the broadcasters responding to Indecon's survey (49%) indicated that a DAB share of between 1% and 25% would be appropriate, as depicted in the next figure.

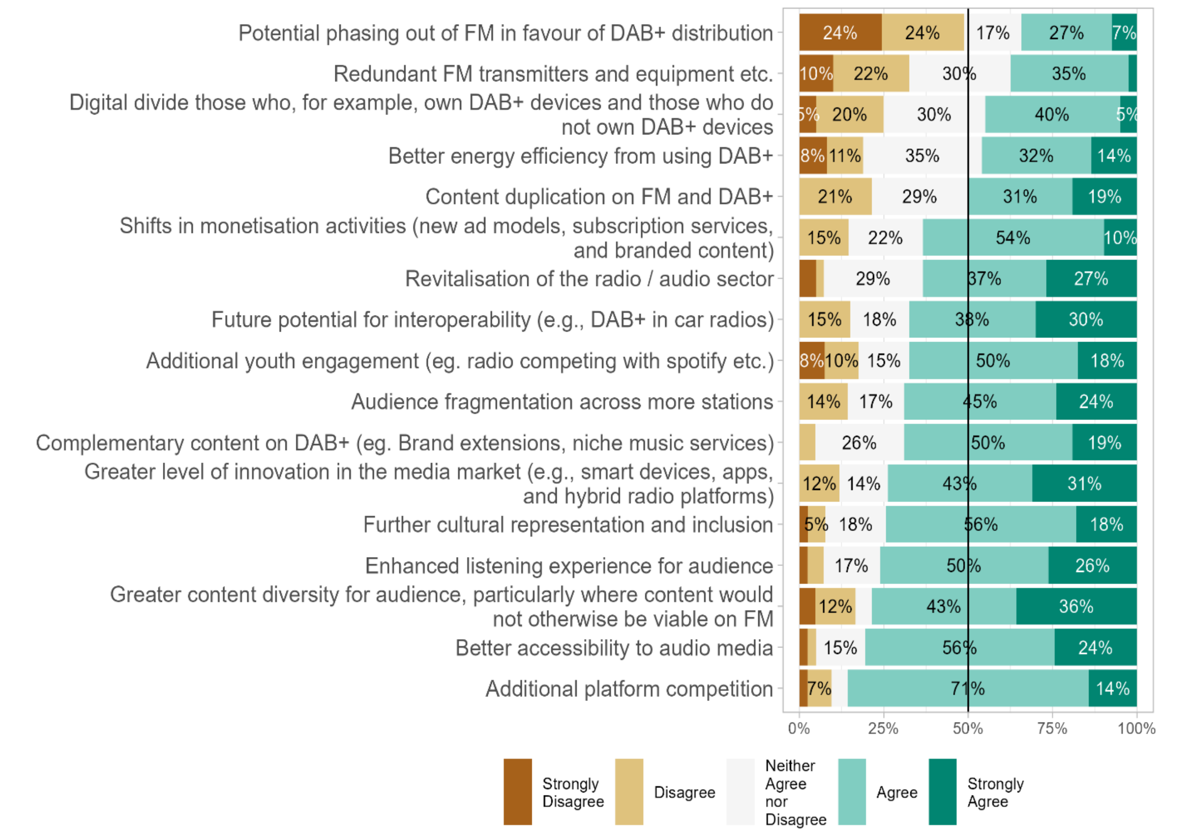
Figure 3.2: Survey – Optimal Share of DAB in Radio Sector



Source: Indecon Survey

Survey responses also suggest that broadcasters do not generally view the introduction of DAB+ as implying the phasing out of FM radio, as shown in the figure below. Almost half of respondents (48%) disagreed that DAB+ would lead to the replacement of FM, indicating a widespread expectation that the two platforms can coexist. In addition, a large majority of respondents considered that DAB+ would increase platform competition (85%), improve access to media (80%), enhance content diversity (79%) and improve the listening experience for audiences (76%). These perceived benefits align closely with An Coimisiún's objectives in relation to plurality, diversity and accessibility within the Irish media sector.

Figure 3.3: Survey – Implications of Implementing DAB+



Source: Indecon Survey

3.3 International Trends

The market pressures evident in Ireland form part of a wider global shift in the audiovisual sector. This sub-section reviews international experience and emerging patterns in comparable jurisdictions, to contextualise developments in Ireland and to draw out insights on the future trends most relevant to digital transformation in the Irish market.

Comparison with the UK: TV/Audiovisual Sector

The UK's TV and visual media market is comparable to that of Ireland. Like Ireland, live broadcast TV and radio services continue to be widely used and valued; however, the expanded level of choice enabled by technological advancement has led to a decline in linear viewing and listening in the UK.[45]

Mirroring Ireland, audience engagement with alternative forms of audiovisual content has expanded rapidly, driven by the growth of video-sharing platforms such as YouTube and subscription-based video-on-demand (SVOD) services such as Netflix. In 2024, these two formats together accounted for an estimated 33% of total in-home video viewing in the UK, with video-sharing platforms representing 19% (including 14% from YouTube) and subscription- or advertisement-based VOD representing 14% (including 8% from Netflix). While the proportion of households subscribing to VOD services has stabilised at around 68% in the first half of 2025, average viewing time continues to rise, indicating

[45] Source: https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/media-bill/media-bill-roadmap?v=331005

ongoing consolidation of non-linear and on-demand viewing within overall media consumption patterns.

Traditional broadcasters have sought to adapt to evolving audience preferences and the growing presence of online competitors by expanding their own VOD offerings. In the UK, the BBC has been successful in this and now accounts for an estimated 19% of total in-home video viewing, of which approximately four percentage points are derived from its VOD services. Collectively, broadcaster VOD platforms represented about 9% of total in-home video viewing in 2024.[46]

Data from Q1 2025 indicate that a small but meaningful share of UK audiences, comprising mainly younger individuals who consume television primarily via the internet, did not view any PSM content on traditional TV sets. UK PSM broadcasters have increasingly sought to distribute their content via third-party platforms such as YouTube, in an effort to reach younger and more digitally oriented audiences.[47] Irish PSM broadcasters, such as RTÉ and Virgin Media, also post content on YouTube to achieve the same outcome.

Despite these efforts to diversify and attract audiences through on-demand and online services, UK PSM organisations continue to experience a decline in overall reach. In addition, the distribution of content through third-party platforms and the expansion of VOD infrastructure have increased operating costs, while revenue growth has not kept pace. This reflects both the limited monetisation potential of PSM content on video-sharing platforms and the challenges of generating sufficient returns from VOD services to offset rising distribution expenses.

These audience developments are indicative of deeper structural trends that provide insight into the likely direction of future behaviour in the UK. Data from Ofcom, the regulator for communications services in the UK, show that children and younger audiences spend considerably less time on broadcast services than older cohorts. Among children aged between four and fifteen, between 27% and 28% of in-home viewing time is spent on YouTube, 12% to 15% on Netflix, and only 6% to 14% on BBC services, depending on the age subgroup.[48] For teenagers aged 13 to 15, 22% of viewing time is devoted to TikTok, compared with 16% among those aged 16 to 24.

Like in Ireland, it remains uncertain whether these viewing patterns reflect temporary age effects where preferences change with life stage, or longer-term cohort effects that will persist over time. Even among older audiences, viewing habits are evolving, with a gradual shift towards online news consumption. Nonetheless, broadcast television remains both the most-used and most-trusted medium for news, underscoring its enduring public value within an increasingly digital media ecosystem.

There are significant financial implications arising from these developments, which mirror those experienced in Ireland. PSM revenues have declined sharply in the UK, with income from television licence fees falling by 11% since 2019 and by 28% since 2014. Linear television advertising revenue has contracted even more steeply, by 30% since 2019. Although UK broadcasters' VOD advertising revenue has grown substantially, this has not been sufficient to offset the decline in traditional income streams, as the overall advertising market continues to be disrupted by the dominance of online platforms. At the same time, PSM operating costs have risen, driven by the need to reach audiences on third-party platforms, the expense of establishing and maintaining VOD services, and increased competition for production resources as international commissioners expand their investment in the UK market.

[46] Transmission Critical, Ofcom, July 2025
[47] See Financial Times Article: https://www.ft.com/content/cdcfbec7-1472-4161-a29f-71426333bd40
[48] While there may be some BBC watching on YouTube, the data does not allow disentangling this.

In response to these pressures, PSM expenditure on original UK content has decreased by approximately 17% between 2014 and 2023.[49] While this reduction has been partly offset by increased spending from other video service providers, a clear slowdown in overall commissioning activity is evident. International commissioners tend to prioritise commercially attractive content with global appeal. As a result, financing opportunities for culturally specific or niche programming have become more constrained; for example, two-thirds of non-PSM investment in 2024 was directed towards drama production in the UK.

A further consequence of intensified international competition has been the concentration of PSM commissioning budgets, with implications for public media values such as diversity of views and cultural content. Whereas PSBs have traditionally invested in a broad range of genres reflecting their public service remit and commitment to diversity, recent research indicates that PSBs have shifted towards commissioning fewer but higher-cost productions, a trend that has reduced investment in specialist genres and also contributed to a decline in the diversity of producers active within the sector. While RTÉ spent more on and produced more Independent Programmes in 2024 than 2023 (e.g., in 2024, 530 hours of radio and 500 hours of TV were commissioned through the Independent Programmes account at a cost of €47.4 million, compared with 440 hours of radio and 494 hours of TV in 2023 at a cost of €45.0 million in 2023)[50], as production costs rise, Ireland could face the same challenges whereby both international commissioners and PSBs fund commercially attractive content rather than commissioning content based on non-financial aspects.

Recent UK research has developed indicators to assess how PSM commissioning supports diversity within the production sector. The findings highlight that general factual programming (consumer affairs, lifestyle, daytime magazine, talk shows and documentaries) and specialist factual genres (history, natural history, science, and business/finance programming) tend to support a high degree of producer variety. These genres often provide opportunities for smaller, newer, and independent production companies, thereby contributing directly to the health and sustainability of the wider media ecosystem. Niche genres, including arts and classical music, education, and religion and ethics, also play an important role in maintaining diversity and offering entry points for smaller producers. Entertainment and comedy programming are associated with a moderate level of producer diversity, but their long-running nature provides financial stability that can enable producers to invest in innovative or higher-risk projects. By contrast, drama production supports only a moderate mix of producer variety, typically involving more experienced and well-established companies often based in London, resulting in a narrower distribution of opportunities across the production sector.[51]

Indeed, available evidence suggests that the broader cycle of creative renewal may be weakening in the UK. The proportion of producers receiving their first PSM commission has fallen from 35% in 2016 to 17% in 2023, significantly reducing opportunities for new entrants and emerging talent. Given that the dynamism of the production sector is integral to the delivery of high-quality television content, this has implications for policymaking. In several jurisdictions, fiscal measures such as tax incentives, investment obligations, and levies directed towards specific segments of the production sector have been introduced to stimulate content creation.

The Future of Television Distribution

Recognising these challenges, a discussion has emerged on the future of television distribution in the UK. As audience preferences continue to evolve and the costs for PSM organisations rise in delivering content across multiple platforms (including linear broadcasting, video-sharing services, and video-on-demand), a key question has arisen regarding the extent to which television delivery could, or

[49] Ofcom (2023) Review of Public Service Media

[50] Sources: https://about.rte.ie/commissioning/wp-content/uploads/sites/3/2025/07/RTE-Independent-Productions-Annual-Report-2024.pdf (2024), https://about.rte.ie/commissioning/wp-content/uploads/sites/3/2024/11/RTE-Independent-Productions-Annual-Report-2023.pdf (2023)

[51] O&O (2025) Changing UK Content Investment: What Could This Mean for the Health of the Production Sector?

should, transition to internet-based platforms. The impact of evolving audience habits is expected to lead to a sharp reduction in scheduled television viewing through DTT and satellite platforms, falling from 62% of total long-form programme viewing in 2023 to 28% by 2035, and to just 22% by 2040. By the end of this period, linear viewing is likely to be done primarily by the relatively small proportion of households that continue to depend solely on DTT for access to television services. As a result, it is unclear whether DTT will remain sustainable, particularly as distribution costs of DTT infrastructure are rising.[52]

Ofcom has cautioned that an unmanaged transition in which existing distribution arrangements are allowed to evolve without coordinated intervention could result in diminishing choice and quality for audiences that continue to rely on DTT. It noted that ongoing market and financial pressures are likely to compel broadcasters, platform operators, and governments to make increasingly difficult decisions about the future mode of television distribution. To address these challenges, Ofcom has outlined three broad strategic options for consideration.

1) The first involves continued investment in a more efficient DTT platform, on the basis that DTT could continue to deliver sufficient audience reach throughout the 2030s, or where a managed transition away from terrestrial broadcasting is deemed undesirable. This option would require sustained funding and would potentially support households to adopt new equipment capable of receiving more efficient broadcast signals.

2) The second option would reduce DTT to a limited 'core' or 'nightlight' service, maintaining only a small number of essential public service channels. This approach could serve either as a transitional phase towards full switch-off or as a long-term safety-net service for households unable to access IP-based television. Operating costs would be reduced and shared among fewer users, while co-use of infrastructure (for example, by FM and DAB radio) could help retain power-resilient broadcast capacity in emergencies.[53]

3) The third option proposes a managed DTT switch-off during the 2030s, accompanied by a national programme to help audiences transition to internet-based television. Such an approach would require extensive planning and targeted support to maintain the universality of public service broadcasting and ensure that no groups are left behind, while also offering potential wider benefits in terms of digital inclusion and connectivity.

In considering the switch to IPTV, it is important to take into account the fact that a sizeable number of individuals have limited methods of accessing the internet at home. Data suggests that in the UK, 3.7% of those aged 16 or more do not use the internet.[54] To compare with Ireland, TAM Ireland Establishment Survey data shows high connectivity levels in Ireland, with fixed-home broadband penetration at 83% while mobile broadband (via Smartphone/4G/5G) is in 90% of homes.

Non-internet-users in the UK are disproportionately represented among older age cohorts – particularly those aged 75 and over – as well as among individuals in DE social grades, social housing tenants, retired persons, and those living in smaller households, as is the case in Ireland. This cohort also displays distinct behavioural and technological characteristics, being more likely to retain a fixed landline and less likely to own a smart TV than other respondents, which reinforces the importance of considering demographic and socio-economic disparities in digital adoption when assessing the implications of any transition to IP-based television delivery.

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[52] Ofcom (2025) The Future of TV Distribution
[53] It is possible that Saorview is near this "core" level already given that Freeview in the UK carries approximately 70 TV channels. Saorview has 23 channels, including radio and +1 type channels.
[54] Ofcom's 2025 Technology Tracker.

A further cohort of interest comprises those who rely exclusively on mobile data connections at home, estimated at around 2.8% of individuals aged 16 and over in the UK. This group tends to be concentrated among younger adults aged 18-34 and among those renting from private landlords. Their connectivity profile differs notably from both fixed broadband users and non-internet users: they are significantly less likely to own or use a landline phone, reflecting a more mobile-centric approach to communication and media consumption. This reliance on mobile data alone may limit the ability of such households to access IP-based audiovisual services.

A smaller but distinct segment comprises those who access the internet only outside the home, estimated at approximately 0.9% of individuals aged 16 and over in the UK. This group skews towards younger respondents, particularly those aged 25-34, and individuals renting from social landlords. Like mobile-only users, they are less likely to own or use a landline phone compared with broadband users and non-internet users. Their limited in-home connectivity suggests a reliance on public or shared internet access points, which may constrain opportunities for consistent engagement with online content and services, and underscores the ongoing importance of universal, affordable home connectivity in any transition to IP-based television distribution.

In addition to the availability of internet access, the usability of internet-enabled devices represents a further barrier to the adoption of IP-based television, particularly among older age groups. Given that digital exclusion carries significant social and economic implications, it will be important to promote inclusive IPTV solutions that accommodate varying levels of digital literacy and ensure that all audiences can participate in the transition towards more internet-based television services.

Research has identified a range of usability barriers that disproportionately affect older adults and individuals with lower levels of digital literacy when using digital television services, particularly IPTV platforms. Key challenges include unclear and inconsistent navigation structures, complex remote-control layouts, and cumbersome sign-in and search processes, all of which can deter users or lead them to revert to traditional broadcast viewing. In addition, visual clutter, inefficient text entry methods, and poor ergonomic design present further obstacles, especially for those with cognitive or physical impairments. These findings highlight the importance of ensuring that any future policy or reform in television distribution actively supports equitable engagement across Irish society, through the promotion of accessible, user-centred design and inclusive approaches to digital service delivery.[55]

In terms of environmental sustainability, recent research by the BBC has highlighted that video distribution methods (broadcast or streaming) account for only a small share of the total energy footprint (around 6%) and that the consumption phase dominates overall emissions (93%). The study found that the energy difference between streaming and traditional broadcast delivery is narrowing rapidly and is expected to converge within the next decade. This suggests that shifts between distribution modes are likely to redistribute, rather than substantially reduce, the system's total energy use. However, this assessment is based on internet-based and DTT distribution being considered as alternatives, whereas the current coexistence of multiple delivery modes is not energy efficient. A gradual consolidation towards a single, more efficient distribution system could therefore deliver operational energy savings across the media value chain.

[55] DTG (2025) Usability project: Identifying challenges and solutions for improving inclusivity and usability in the consumption of internet-delivered television.

The UK Regulatory Environment: TV/Audiovisual Sector

To enable comparison with Ireland's regulatory framework (discussed in Section 4.3), the UK audiovisual regime can be understood as sharing a broadly similar service-based structure, with distinct categories of linear broadcasters, on-demand services and online platforms, while differing in the regulatory tools applied to each category.

Public Service Media (PSM)

The UK's public service broadcasting system (BBC, ITV, Channel 4, Channel 5 and S4C) operates under a well-defined statutory framework, with extensive public service obligations covering news and current affairs, original UK content, regional output, children's programming and cultural representation. These obligations are enforced through Operating Licences issued by Ofcom, supported by annual performance monitoring. The UK PSM system also plays a central role in sustaining the independent production sector through statutory commissioning quotas and well-established "Terms of Trade" arrangements. This support is delivered primarily through commissioning obligations.

Terrestrial television continues to play a central role in the UK PSM model, both as a delivery platform for universal free-to-air services and as the primary mechanism through which prominence obligations are realised. However, statutory prominence requirements, strengthened under the Media Act 2024, ensure visibility for PSM services across electronic programme guides and connected-TV environments, reinforcing the continued policy relevance of linear distribution even as viewing shifts towards hybrid modes. Policy and regulatory debates in the UK increasingly reflect questions about the long-term role and scale of DTT within a more IP-centric distribution landscape. As discussed above, Ofcom has highlighted the need for a structured debate on the future of DTT, noting that potential changes to the platform have implications for the accessibility of public service media over time.

Licensed Commercial Broadcasters

Commercial linear broadcasters in the UK operate under Ofcom broadcasting licences and are subject to the Broadcasting Code, including standards on harm and offence, impartiality, advertising and accessibility. However, unlike PSBs, they are not subject to public service remits or mandatory production quotas. Distribution and prominence for these services are largely market-driven.

On-Demand Programme Services (ODPS)

On-demand audiovisual services in the UK are regulated under a notification-based ODPS framework. Providers meeting the statutory definition must notify Ofcom and comply with baseline content standards, including protection of minors, advertising rules and accessibility.

While originally designed as a light-touch regime, the Media Act 2024 significantly strengthens Ofcom's powers, particularly in relation to major VOD platforms. Nevertheless, notification remains primarily a threshold trigger, rather than a substantive regulatory instrument, and the UK does not impose levies or funding obligations on VOD services.

Video-Sharing Platforms (VSPs)

The UK's VSP regime, introduced in 2020 and now largely subsumed into the Online Safety Act 2023, imposes obligations relating to harmful content, protection of minors and advertising controls. While broadly similar in scope to Ireland's designation and safety code model, the UK approach is increasingly horizontal and platform-agnostic, with duties integrated across multiple online service types.

Other International Examples of Recent Reform in Audiovisual Regulation

Below are five illustrative examples of additional jurisdictions often cited as modern and (in varying degrees) platform-neutral in their audiovisual regulation.

Germany – Interstate Media Treaty (Medienstaatsvertrag, MStV)

Germany replaced its former broadcasting treaty with the Interstate Media Treaty (MStV) in 2020, introducing a modernised, technology-neutral framework that governs both linear broadcasting and on-demand "telemedia" services. The Treaty is enforced by the state media authorities (Landesmedienanstalten), who also publish an official English version.[56]

A distinctive feature of the MStV is its broad scope. In addition to regulating audiovisual service providers, it also applies to media platforms, user interfaces (including smart-TV portals, EPGs and voice-controlled interfaces), and media intermediaries such as search engines and social networks. These actors are subject to transparency and non-discrimination obligations intended to safeguard media plurality across the full distribution chain.

Germany is widely regarded as a leader in addressing the distribution and intermediation layers. Obligations include transparency over ranking and recommendation algorithms and specific requirements for the findability of designated "Public Value" content on user interfaces. This effectively establishes a modern "must-be-found" regime that supersedes traditional "must-carry" approaches. The media authorities periodically determine which services qualify as Public Value offerings. These services and catalogues must be prominently presented and easily discoverable. The regime is actively maintained and updated, and a second determination cycle concluded in 2025. Supervision rests with the state media authorities, who issue guidance on transparency for intermediaries. Although some cross-border jurisdictional questions remain before the courts, the overall framework is stable and operational.

France – SMAD Decree (2021) and ARCOM Prominence Rules

France implemented the revised AVMSD through the SMAD Decree (Décret n° 2021-793), enforced by ARCOM.[57] The Decree applies financing obligations to on-demand services established in France and to foreign services targeting the French market, making full use of the Directive's "country-of-destination" provisions. Subscription VOD services must invest a proportion of their French revenues in European or French-language works. The standard rate is 20%, rising to 25% for services offering recent films on shortened release windows. ARCOM has concluded individual agreements with major platforms (including Netflix) to operationalise these obligations and associated sub-quotas for independent production and cultural heritage ("patrimonial") works.

France has also established a prominence regime for services of general interest (SGI) across connected-TV user interfaces. ARCOM has adopted detailed rules specifying how manufacturers, operating-system providers and app-store operators must ensure appropriate visibility for SGI services. For SMAD services established in France, obligations go beyond the EU minimum: catalogues must include 60% European works, including 40% French-language works, supported by explicit promotion requirements such as curated carousels, search-tool visibility and recommendation prominence.

Canada – Online Streaming Act (2023) and CRTC Implementation

Canada's Online Streaming Act (Bill C-11) modernised the Broadcasting Act by bringing online undertakings, including global video streamers and social media services, within the Canadian

[56] Source: https://www.die-medienanstalten.de/fileadmin/user_upload/Rechtsgrundlagen/Gesetze_Staatsvertraege/Interstate_Media_Treaty_en.pdf?
[57] Source: https://www.arcom.fr/en/find-out-more/legal-area/legal-resources/decree-no-2021-793-june-22-2021-demand-audiovisual-media-services-smad

regulatory system. The Canadian Radio-television and Telecommunications Commission (CRTC) adopted registration regulations in September 2023, formally bringing large platforms into scope.[58]

In June 2024, the CRTC introduced a base contribution requirement of 5% of Canadian revenues for in-scope streaming services. Funds are directed to priority cultural and public-interest areas including local news, French-language content, Indigenous production and equity-deserving communities. Canada's approach is service-agnostic across the online layer. It does not distinguish between linear and on-demand delivery, instead applying obligations to any online undertaking operating in Canada above defined revenue thresholds.

Discussion

Germany stands out for adopting a single, media-neutral statutory framework through the Interstate Media Treaty (MStV), which applies consistently across linear broadcasting and on-demand "telemedia" services. A defining feature of the German model is its extension of regulatory obligations beyond content providers to include media platforms, user interfaces (such as smart-TV portals, EPGs and voice-assistant environments), and media intermediaries including search engines and social networks.

These actors must comply with transparency requirements covering ranking and recommendation systems, and user-interface providers are subject to rules ensuring the findability of designated Public Value content. This creates a modern "must-be-found" standard that applies across delivery modes and helps ensure near-parity between broadcast and VOD services at the service layer, while also regulating the distribution and intermediation layers that shape audience exposure and choice.

France applies obligations to VOD services that are almost as robust as those for television, particularly in relation to investment duties. France also operates a prominence regime for "services of general interest" across connected-TV user interfaces and imposes enhanced catalogue rules for in-scope services established in France (e.g. 60% European works, including 40% French-language). While the respective obligations have been more closely aligned, France maintains separate regimes for broadcast and on-demand services.

Through the Online Streaming Act, Canada has brought online undertakings, notably global streamers, into the same statutory framework as traditional broadcasting. This creates a high degree of economic parity between linear and online services. However, the regime retains class-based implementation, meaning that obligations differ across service types, preventing full equivalence across the system.

Comparison with the UK: Audio/Radio Sector

Radio and DAB in the UK

DAB has been present in the UK for a prolonged period. The first DAB digital radio services were launched by the BBC in 1995, followed by the introduction of commercial DAB services in 1999. Unlike Ireland, however, DAB has since become the dominant radio distribution platform in the UK.[59]

According to Radio Joint Audience Research (RAJAR), DAB accounted for 42% of total listening hours in the UK in Q1 2025, compared with 27% for AM/FM. As noted in Ofcom's 2025 assessment, much of the commercial radio sector's success in growing overall listening has been driven by expanded DAB coverage and by broadcasters making more intensive and strategic use of existing multiplex capacity and established radio brands. This outcome was not immediate. For a prolonged period, the

[58] Source: https://crtc.gc.ca/eng/archive/2023/2023-329.htm
[59] Source: Ofcom Media Nation 2025 - https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/media-nations/2025/media-nations-2025-uk-report.pdf?v=401287

replication of existing FM services on DAB failed to shift listening behaviour, demonstrating that simple simulcasting is insufficient to drive digital adoption. Momentum only began to build following a more sustained industry and policy push from around 2010, alongside greater service differentiation and improved coverage.[60]

While the UK radio sector remains regulated by Ofcom, it operates under a comparatively lighter-touch framework than Ireland's. Over recent years, regulatory requirements for commercial radio have been progressively relaxed, with the objective of reducing regulatory burdens and enabling stations to compete more effectively with digital and online audio platforms. This process was formalised through the Media Act 2024 and preceding Ofcom consultations. Prior to these reforms, the commercial radio licensing framework in the UK was largely based on arrangements more than three decades old. The Government's 2017 consultation on commercial radio deregulation concluded that a range of legacy requirements could be removed, while maintaining protections around the provision of local news. The 2024 reforms also removed Ofcom's role in regulating which radio services are carried on DAB multiplexes, reinforcing a market-led approach to multiplex capacity.[61]

With DAB penetration now relatively high and broadcasters increasingly using DAB+ to expand choice and launch additional services, Ofcom has examined whether DAB's share of listening will continue to be sustained over time, or whether growth in online and on-demand audio consumption may begin to erode DAB listening hours. While Ofcom notes that listening via online platforms and smart speakers has grown rapidly in recent years, its analysis indicates that DAB remains the largest single platform for radio listening and continues to play a central role in radio distribution. Ofcom highlights the emergence of a more hybrid audio ecosystem in which broadcast platforms such as DAB coexist alongside IP-based delivery. This reflects a broader policy focus on ensuring that the regulatory framework remains adaptable as listening behaviour continues to evolve.

Broadcasting a radio service on a digital multiplex in the UK requires a Digital Sound Programme (DSP) licence. This licence is broadly comparable to Ireland's Section 71 content provision contract, which is currently required for participation in the DAB+ trial if a digital broadcaster. However, there are material differences in cost and administrative burden. In the UK, the DSP licence attracts a non-refundable application fee of £250 and an annual fee of £100. This contrasts with the €1,500 non-refundable application fee for Section 71 contracts in Ireland, followed by an annual fee of €2,000 for each year the service is licensed.[62] Even with the current 75% reduction on fees, which has been set for the duration of the DAB trial in Ireland, the reduced fees are still more than the non-reduced fees in the UK.

A particularly significant feature of the UK framework is the development of small-scale DAB. This provides a lower-cost digital transmission model designed to serve local commercial, community and specialist radio services.[63] According to Ofcom, the policy rationale for small-scale DAB was to create a practical digital pathway for existing analogue community and smaller commercial stations that had struggled to access, or afford capacity on, larger local multiplexes covering extensive geographic areas.[64] In March 2025, small-scale DAB reached over 32% of UK households, up from 26% in March 2024.

Small-scale radio multiplex services bundle multiple digitised radio channels and transmit them using a single frequency block, making more efficient use of spectrum.[65] A dedicated small-scale radio

[60] Source: BBC, 2010 - https://www.bbc.co.uk/news/10569231.amp
[61] Source: https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/media-bill/media-bill-roadmap?v=331005
[62] Source: https://www.cnam.ie/app/uploads/2025/02/20250219_S71-Guide-and-App-2025_vFinal.pdf
[63] Source: Ofcom - https://www.ofcom.org.uk/tv-radio-and-on-demand/digital-radio/turn-up-and-tune-into-small-scale-dab
[64] Source: Ofcom's SSDAB Report, 2024 - https://www.ofcom.org.uk/siteassets/resources/documents/manage-your-licence/digital-radio/small-scale-dab/ssdab-progress-report-2024.pdf?v=383726
[65] Source: https://www.ofcom.org.uk/siteassets/resources/documents/manage-your-licence/digital-radio/small-scale-dab/supporting-data/small-scale-radio-multiplex-licence-guidance-24.pdf?v=389970

multiplex licence is required to operate such services, while individual stations carried on these multiplexes must hold either a standard DSP licence or a Community DSP (C-DSP) licence. By the end of June 2025, 74 small-scale DAB multiplexes were operational across the UK.

The roll-out of small-scale DAB has also opened new opportunities for existing community stations to extend their reach and gain access to the market while maintaining their focus on local content and social impact. Since Small-scale DAB roll-out commenced in 2020, Ofcom has licensed 160 digital community radio licences, extending the provision of services to many new communities across the UK. Community radio services operate under C-DPS licences, which cost the same price as the DSP licences.[66]

Other International Examples of FM and DAB Balance

Australia

AM/FM radio and DAB+ are the main delivery mechanisms for radio currently in Australia.[67] Like Ireland, FM still dominates in the radio sector; however, Australia is generally considered to have been successful in integrating DAB into its media sector. Digital radio services began in Australia in 2009.[68]

In 2024, in line with global markets, fewer people were listening to the radio overall in Australia, declining from a peak of 85% in 2017, down to 65% in 2024. However, while listenership to FM radio has been notably falling over time (52% in 2024 down from 73% in 2017), in line with the falling listenership of radio more generally, that for digital radio has been relatively stable over the same period (13% in 2017 to 11% in 2024).[69]

DAB+ remains the Australian industry's preferred long-term digital platform, given the level of investment to date and the constraints on FM spectrum availability. However, there are mixed views about the cost–benefit of DAB+ outside the major cities. Unlike Ireland, due to the low population and large landmass, there are issues with reception and coverage across the country, especially outside the metropolitan areas, which have limited the coverage and expansion of DAB.[70] People living in metropolitan areas were more likely to listen to DAB+ (21%) than those in regional areas (11%). There has been little interest by commercial broadcasters in the take-up of DAB+ licences outside the capital cities, despite earlier expressions of interest. Thus, in Australia, DAB+ is seen as a complementary technology to AM/FM radio. Small-scale DAB+ is also considered unfeasible as a digital delivery platform for the FM sub-metropolitan community services because there is insufficient spectrum to accommodate all such services in a metropolitan area.

Listeners of FM radio (94%), AM radio (89%), and DAB+ (70%) were also found to be most likely to do so in a car than anywhere else.[71] Once again, this is likely to be due to the size of the country, which lends itself to driving as a form of commuting.

Notably, DAB skews in Australia to younger listeners, who appear to prefer genre-specific stations, for which DAB caters excellently. Thus, the increase in DAB is also an important part of the Australian programme for building up listenership with younger listeners. Years after the introduction of digital

[66] Source: https://www.ofcom.org.uk/siteassets/resources/documents/manage-your-licence/digital-radio/small-scale-dab/round-1-advertisement/c-dsp/cdsp-licence-guidance.pdf?v=391679
[67] Source: The Future Delivery of Radio - https://www.acma.gov.au/publications/2020-03/report/future-delivery-radio
[68] Source: https://www.accc.gov.au/by-industry/telecommunications-and-internet/digital-radio-access-regulation
[69] Source: https://www.acma.gov.au/sites/default/files/2024-12/Trends%20and%20developments%20in%20viewing%20and%20listening%202023%E2%80%9324.pdf
[70] Source: https://www.radioworld.com/global/ennals-dab-will-never-replace-fm-in-australia
[71] Source: https://www.acma.gov.au/sites/default/files/2023-12/ACMA_How%20we%20watch%20and%20listen%20to%20content_Executive%20summary%20and%20key%20findings.pdf

radio to the metropolitan licence areas, most new cars (73%) on sale in Australia have DAB+ radios as a standard feature.

The ACMA, the communications and media services regulator in Australia, manages the radio spectrum on behalf of the Commonwealth Government under the Radiocommunications Act 1992. The Authority also publishes fees for commercial broadcasters known as commercial broadcasting taxes. Fees for AM/FM bands start at $50 and can increase to over $5,000 (~€2,800), depending on geographical range, spectrum band and transmitter power.[72] However, the ACMA has currently suspended these fees for a 12-month period to provide temporary relief to broadcasters.[73]

In Australia, it appears DAB is more regulated than FM, as the Australian Competition and Consumer Commission (ACCC) also administers the access regime under the Radiocommunications Act 1992 to ensure fair access to multiplex capacity, preventing anti-competitive practices.[74] Each digital broadcaster needs a digital radio multiplex transmitter (DRMT) licence. Application fees for digital radio licences in Australia are $1,130, which is approximately €635.[75] Once the ACMA issues the provider with a DRMT licence, the digital radio joint venture company (JVC) must then provide the ACCC with an access undertaking. The JVC represents commercial and community digital radio broadcasters and is responsible for multiplexing together the separate streams of content from individual broadcasters and transmitting a combined stream to listeners in each licence area, essentially managing the capacity for broadcasters.[76]

Switzerland

After a decade-long preparing for the transition to DAB+, on 31 December 2024, the Swiss public broadcaster, SRG SSR, ceased FM broadcasting.[77] However, radio programmes can still be broadcast on FM until the end of 2026, and local radio stations decide for themselves when to stop broadcasting on FM. Before the shut-off, most audiences were already listening to DAB, helping the transition. The transition was also considered successful due to the near-complete DAB+ network coverage, resulting in better radio reception compared to FM.[78] The transition was deemed necessary as all available FM frequencies in Switzerland are already fully occupied by radio services, limiting growth in the sector. With the switch to DAB+, the range of programmes in Switzerland can be continuously expanded.

Shortly after the SRG switched off FM, radio usage via FM has already declined significantly across Switzerland and now accounts for only 13% of total radio usage. Radio is now mainly consumed digitally in all regions of Switzerland, with 87% of all radio usage now via digital reception.[79] While some local radio services are currently operating both FM and DAB until they turn off FM by the end of 2026, dual broadcasting is expensive, and broadcasters could only afford these two channels because DAB+ distribution is subsidised by the federal government. This was to simplify the switch for broadcasters to the digital radio world. Only 7% of the Swiss population now listens to radio exclusively via FM. In contrast, 57% of the population listen to radio exclusively in digital form.

Discussion

International experience illustrates differing pathways in the transition from analogue to digital radio. In Australia, FM radio remains the dominant platform despite long-standing investment in DAB+, with overall radio listening declining and digital listenership remaining relatively stable. DAB+ is positioned as the industry's preferred long-term digital platform due to FM spectrum constraints, but its role is

[72] Source: https://www.acma.gov.au/sites/default/files/2025-07/Commercial%20broadcasting%20transmitter%20licence%20fee%20schedule_2025-26.pdf
[73] Source: https://www.acma.gov.au/licence-fees-commercial-broadcasters
[74] Source: https://www.accc.gov.au/by-industry/telecommunications-and-internet/digital-radio-access-regulation/digital-radio-services
[75] Source: https://www.acma.gov.au/digital-radio-licences
[76] Source: https://www.accc.gov.au/by-industry/telecommunications-and-internet/digital-radio-access-regulation
[77] Source: https://www.bakom.admin.ch/en/radio-fm-switch-off-from-31122024
[78] Source: https://dabplus.ch/fragen-antworten/
[79] Source: https://www.bakom.admin.ch/en/radio-usage-in-switzerland-spring-2025

largely complementary, with uptake concentrated in metropolitan areas and limited expansion beyond main cities because of coverage challenges, cost considerations, and low commercial interest.

By contrast, Switzerland represents a more advanced stage of digital transition, having implemented a coordinated move away from FM following a prolonged preparatory period and near-universal DAB+ coverage. The switch-off of FM by the public broadcaster in 2024 occurred in a context where most listening was already digital, supported by spectrum saturation on FM and government subsidies to ease dual broadcasting costs. As a result, radio consumption in Switzerland is now overwhelmingly digital, with only a small minority relying exclusively on FM.

These cases suggest that geography, population distribution, spectrum availability, regulatory frameworks, and public policy support shape the pace and form of digital radio adoption and demonstrate that DAB+ can function either as a complementary platform or as a full replacement for FM depending on national circumstances.

3.4 Analysis of Developments in Operating Environment

This section draws together the evidence and insights from the preceding sections to provide an assessment of the Political, Economic, Social, Technological, Legal and Environmental (PESTLE) factors shaping the operating environment for the Irish independent broadcasting sector over the medium term. It synthesises the findings from the market analysis, stakeholder engagement and survey evidence, as well as the trends identified across the Irish and international reviews set out earlier in the report and is supported where relevant by selected charts to illustrate key patterns and dynamics. A summary of the principal factors arising under each PESTLE heading is set out below.

Figure 3.4: 'PESTLE' Analysis of Developments in External Environment – Summary

Political	Economic	Social	Technological	Legal	Environmental
Media Regulation in Ireland Government Funding, Levies, and Subsidies Public Service Broadcasting Policy EU Policy New Regulation on Market Players Policies related to DAB	Economic Downturns Operation Costs Advertising Revenue Investment in New Technology Expense of Shifting License System Increased Competition Changes in Taxation	Changing Consumption Habits Public Trust Changing Attitudes Irish Pride Demographics Diversity Expectations Loyalty of the Youth	Digital Transition Innovation AI and Automation Broadband and 5g Data Analyse and Tracking	Regulation in Ireland EU Legislation Changes in Legislation Obligations from Broadcasters Online Safety	Sustainability Goals Energy Costs Energy Efficiency Extreme Weather Events

Source: Indecon Analysis

Political Factors

Political developments continue to play a central role in shaping the sustainability and competitiveness of Ireland's audiovisual sector. Decisions by Government and Coimisiún na Meán influence licensing, funding arrangements, distribution policy and regulatory obligations. Changes to broader public-service broadcasting policy will significantly affect the commissioning environment and the competitive balance between public service and independent media.

Ireland's transition towards a more digitally oriented regulatory framework under the Online Safety and Media Regulation (OSMR) Act 2022 is reshaping how services are licensed or registered. The introduction of registration for VOD services and designation for VSPs increases the breadth of regulated actors. The potential introduction of a content levy for on-demand services under the OSMR Act will also shape future investment flows. Funding schemes, including the Broadcasting Fund and the Sound & Vision Scheme, remain important sources of support for the independent sector, especially in genres where commercial viability is limited.

European policy developments such as the Digital Services Act, Digital Markets Act, European Media Freedom Act and the revised Copyright Directive may further rebalance the relationship between domestic media actors and multinational platforms. Concerns highlighted by stakeholders about the relative lack of obligations on global online platforms reinforce the importance of EU-wide initiatives in promoting media plurality and fair market conditions.

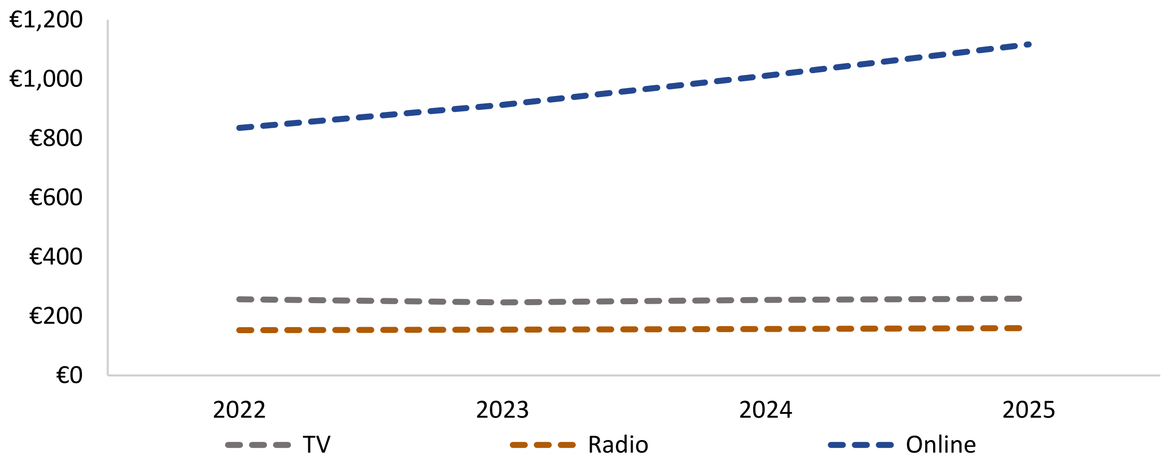
Policies concerning the future of DAB and the long-term role of DTT carry potentially large impacts on the sector. A transition to DAB or IP-based distribution would have implications for universality, resilience and platform neutrality.

Economic Factors

Economic conditions remain a significant source of challenge for broadcasters. The sector faces rising operational costs, including energy, labour, and production expenses, compounded by weaker revenues in parts of the market. Broadcasters report growing difficulty in maintaining content quality at existing funding levels.

Broader macroeconomic pressures, including inflation and uncertainty over licence-fee reform, have contributed to financial uncertainty for public service broadcasters. This has downstream effects on the independent production sector, given its reliance on PSM commissioning. A critical factor is the continued shift of advertising revenue to international digital platforms. As illustrated in the Core Outlook 2025 data, online advertising expenditure continues to expand, while TV and radio revenues remain broadly stagnant. This structural shift undermines the commercial sustainability of independent broadcasters, particularly those operating in geographically constrained markets. Increased competition from global streaming services also impacts audience share and limits advertising growth.

Figure 3.5: Advertising Expenditure Over Time by TV, Radio and Online (€ millions)

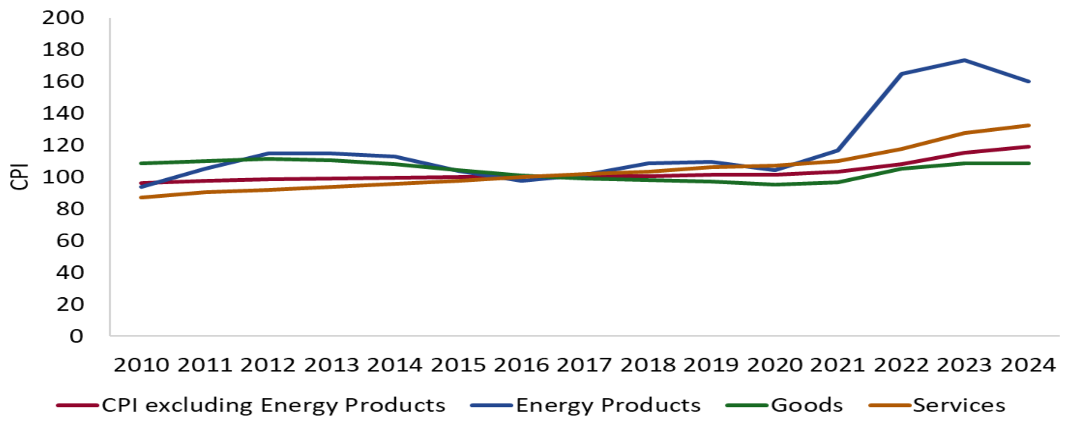


Source: Core Outlook Report, 2025

As shown in the figure above, Ireland has experienced high and volatile energy-related CPI inflation between 2021 and 2024, which has raised broadcasters' operational and distribution costs and, through broader economic effects, weakened advertising revenues and investment capacity, increasing financial strain across the sector.

In addition, the cost of investing in new technology such as digital production systems, analytics tools, data-driven advertising platforms and multiplatform distribution also represents a barrier for smaller broadcasters, increasing the risk of market consolidation. Survey findings highlight the sector's concern about its ability to maintain competitiveness given the increasing capital intensity of digital content delivery. Uncertainty surrounding the future public funding model and potential taxation changes also contributes to market instability. Broadcasters identified the transition toward online and on-demand content distribution as an additional source of cost pressure, particularly due to higher production costs for short-lived formats such as podcasts.

Figure 3.6: CPI Over Time in Ireland



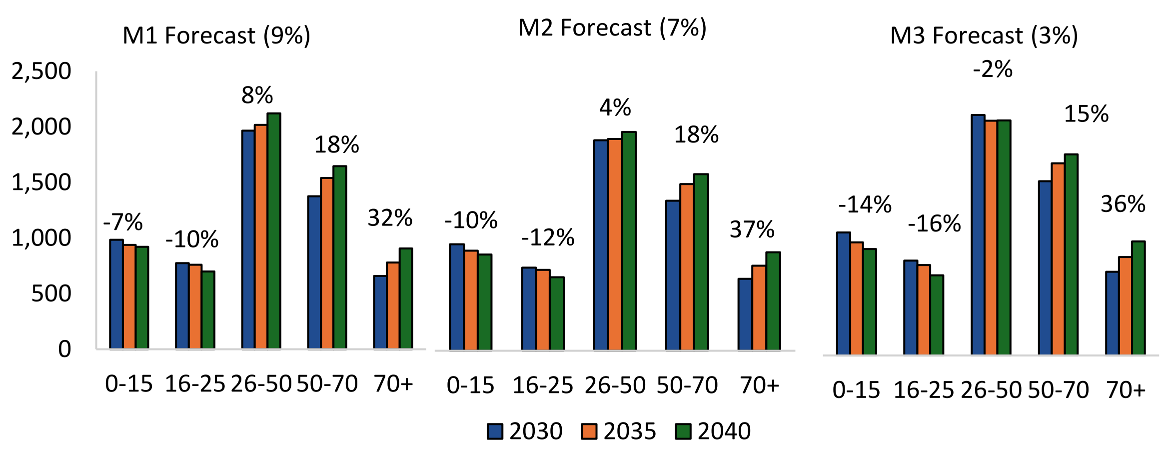
Source: CSO

Social Factors

Social and demographic trends continue to reshape market dynamics. Audience behaviour has shifted significantly towards on-demand video, short-form content, online news, and podcasts (see Figure 2.21), especially among younger cohorts. Traditional linear viewing remains strong among older audiences, but youth loyalty to live broadcasting has weakened. If these patterns represent long-term cohort effects rather than temporary age effects, future audiences may be even less centred on linear services.

The sector must adapt to heightened expectations around personalised content, high production quality, and the availability of content across multiple devices and platforms. Stakeholders note that younger audiences are increasingly platform-loyal rather than broadcaster-loyal. Demographic changes also influence content demand. CSO projections show that while overall population will grow between 2030 and 2040, the youth population will decline, and the over-70 population will rise significantly (over 30% in each forecasted scenario).

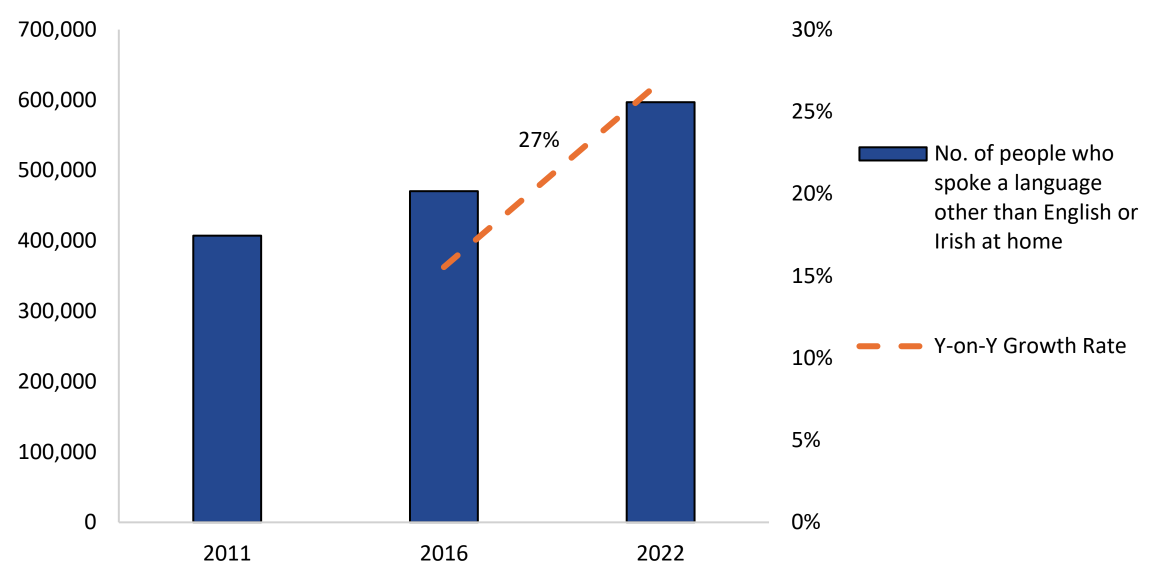
Figure 3.7: Population Projections in Ireland (‘000s)



Source: Indecon’s Analysis of CSO Data

The increase in the number of people speaking a language other than English or Irish at home between 2011 and 2022 is an indicator of greater cultural diversity in Ireland. Between 2016 and 2022, this number rose by 27%. Increased cultural diversity and multilingualism in Ireland increase demand and present opportunities for broader representation and innovative content offerings.

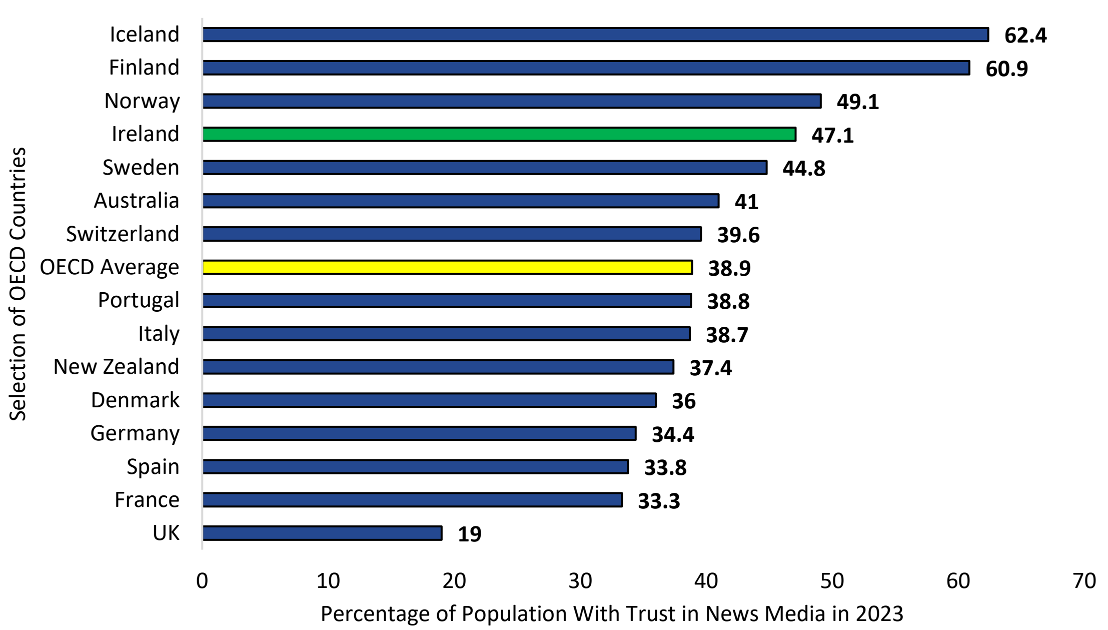
Figure 3.8: Number of People who Spoke a Language Other than English/Irish at Home



Source: CSO

Public trust remains comparatively high in Ireland relative to the OECD average, as highlighted in the figure below. However, misinformation spread via social media risks undermining confidence in traditional news providers. Maintaining trust will require investment in high-quality journalism and transparent editorial standards. Stakeholders reported growing demand for Irish-produced content and increasing expectations for accessible and inclusive media that reflects a modern Ireland.

Figure 3.9: Trust in News Media (2023)



Source: CSO

The Value of Independent Media report[80] found a big shift in how the 18-34-year-old cohort was consuming content, with more individualised viewing rather than collective or shared experiences. The non-linear or on-demand approach can lead to more fragmented and diffused viewing, with content fed via an algorithm rather than being accessed more serendipitously. Many of the younger generation also felt that there is not sufficient variety in the types of music played on different radio stations, with these different stations often covering the same artists or genres. Additionally, there was some frustration around the lack of exposure given to young Irish acts and artists on Irish radio stations.

Technological Factors

Technological transformation is reshaping every aspect of content creation, distribution and consumption. Broadcasters highlighted digital transition as a major driver of change, including migration from analogue to digital systems, the expansion of DAB, and the increasing importance of smart devices.

Innovation is an enabler of competitiveness, but smaller broadcasters face challenges in adopting new technologies. Broadcasters must be innovative to compete for attention, ad revenue and investments. The growth of AI and automation offers opportunities to streamline production processes, enhance transcription and editing, and support data analytics. However, concerns exist regarding job displacement, barriers to adoption for smaller operators, and risks associated with AI-generated misinformation.

The expansion of broadband and 5G enables greater digital consumption but also exacerbates digital exclusion risks. Evidence from Ofcom demonstrates that certain demographics are disproportionately represented among internet non-users. Those who do not use the internet at home or elsewhere skew towards older age groups, social housing rental, those who are retired, and those in smaller households.[81] Comparatively, in 2025, Ofcom found that 5% of people over the age of 16 in the UK do not have access to the internet at home; however, when broken down by age, this figure increased to one in five for those aged 75 and over.[82] If a shift towards internet-delivered TV does occur, it must be with the goal of enhancing the experiences of older and digitally less-confident viewers.[83]

Technological change increases the importance of data analytics, both to understand audience behaviour and to optimise content distribution. Survey results confirm that this is a major skills gap across the sector, which increasingly requires tracking data and targeting audiences.

Legal and Regulatory Factors

Ireland's regulatory environment is in a period of transition. On 10 December 2022, the Oireachtas enacted the Online Safety and Media Regulation (OSMR) Act 2022, which implements aspects of the revised Audiovisual Media Services Directive (AVMSD), including the Directive's provision that allows Member States to impose financial obligations on media service providers established in another EU country but targeting domestic audiences. The OSMR Act introduces new responsibilities for broadcasters, VOD providers and VSPs, including obligations relating to content standards, advertising, accessibility and online safety.

Other relevant EU legislation includes the Digital Markets Act (DMA), Digital Services Act (DSA), and the European Media Freedom Act (EMFA). The European Commission has also investigated potential

[80] Bricolage, 2025. Value of Independent Media. Research Project Debrief for Coimisiún na Meán.
[81] Source: Ofcom 2025 A Demographic Deep Dive into the Internet Use
[82] Source: Ofcom Online Nation Report, 2025
[83] Source: Usability Project: Identifying Challenges and Solutions for Improving Inclusivity and Usability in the Consumption of Internet-Delivered Television, DTG Project for Ofcom

anti-competitive practices in the audio sector.[84] In addition, all cars sold in the EU must carry DAB on their dashboards and as in-car listening equates to 49% of daily radio listening in Ireland,[85] this regulatory change is likely to be impactful.[86]

Technological progress will continue to transform our societies as it brings significant benefits to people, society and economies, but also risks and harm; for instance, cyberbullying victimisation rose by 26% between 2017 and 2022.[87] Current regulatory frameworks often lag behind technological progress and struggle with issues such as overlapping jurisdictions, legal fragmentation, and outdated rules.[88]

Stakeholders emphasised that the current regulatory regime was originally designed for a linear broadcasting environment. As market dynamics evolve, there may be a need to revisit regulatory distinctions between service categories and ensure proportionality across radio, linear television, VOD and online platforms. The forthcoming content levy on VOD services is a significant development, with potential long-term implications for the Irish media sector. In addition, ongoing debates around ownership rules, media plurality protections, and news standards will continue to shape the market. For example, the planned 2026 review of the Audiovisual Media Services Directive may consider whether its scope should be expanded in light of recent EU legislative developments, including the European Media Freedom Act, which explicitly includes audio services within its definition of media.[89] Any such re-alignment could have implications for the regulation of the wider audio sector, particularly given the cross-border nature of digital audio services.

Environmental Factors

The current television distribution landscape where DTT, satellite and IPTV operate in parallel is not energy efficient. Maintaining multiple infrastructures increases the sector's overall energy footprint, and international evidence suggests that a gradual move towards a more streamlined and efficient distribution model could yield operational energy savings across the media value chain. The precise timing and feasibility of such consolidation will depend on technological readiness, universal access considerations and the requirements of Ireland's broadcast system.

Energy costs continue to rise, particularly for transmission networks, data centres and other data-intensive online services. At the same time, sustainability expectations from audiences, advertisers and regulators are increasing, prompting a shift towards more transparent environmental reporting. Broadcasters may need to adopt systematic carbon accounting and explore new approaches to improving energy efficiency in production workflows, distribution systems and day-to-day operations.

Climate change also presents operational risks. More frequent extreme weather events threaten transmission infrastructure, studio operations and continuity of service. This reinforces the importance of maintaining diversified distribution mechanisms, with contingency planning to ensure that critical public information and emergency communications can be delivered reliably under adverse conditions.

3.5 Summary of Key Drivers of Change

The evidence presented shows a gradual but decisive shift in how Irish audiences watch and listen: linear television viewing is declining, radio remains important but increasingly age-skewed, and on-

[84] Source: The Economic Viability of Commercial Radio in Ireland, Oliver & Ohlbaum Associates Ltd, 2023
[85] Source: The Irish Audio Report 2025, Radiocentre Ireland
[86] Source: Briefing Note from Coimisiún na Meán to the Department of Arts, Media, Communications, Culture, and Sports, 2025
[87] Source: OECD Digital Economy Outlook 2024 (Volume 1)
[88] Source: OECD Regulatory Policy Outlook 2025
[89] Sources: https://eur-lex.europa.eu/eli/reg/2024/1083/oj/eng & https://www.consilium.europa.eu/en/press/press-releases/2025/05/13/council-sets-out-its-priorities-for-the-audiovisual-media-sector/

demand services are taking a larger share of attention and revenues. The analysis suggests that structural change in Ireland's media ecosystem is driven by three interrelated sets of factors:

1. Technology, infrastructure and spectrum;
2. Audience behaviour, preferences and trust; and
3. Market structure, competition and business models.

1. Technology and infrastructure

First, the observed shifts in viewing and listening patterns are enabled by the underlying connectivity infrastructure, the distribution platforms available, and how scarce spectrum is used for television and radio. Over the past decade, the roll-out of high-speed fixed broadband, alongside widespread 4G and emergent 5G coverage, has made IP video and audio a realistic default for most households. This is reflected in some recent RED C research, which provides a cross-sectional snapshot in late 2025: almost all adults now have access to a television set, but they also have multiple connected devices through which they can view or listen to content. Around 99% of respondents report owning a smartphone, 96% a TV set and 92% a laptop. Importantly for the future of radio amongst young generations, the diffusion of smart speakers has overtaken that of traditional radio sets, as 55% of the Irish population have a smart speaker (higher for younger population) while 51% own a traditional radio set (dropping to 32% among under-34s). In addition, roughly one-fifth (19%) of Irish adults have a DAB radio device.

On the television side, our earlier analysis showed that Irish DTT penetration is low, with around 12% of households relying on Irish DTT as their primary platform. However, should the cost-of-living pressures continue to increase, some households may seek to reduce subscription expenses, leading to renewed reliance on free-to-air platforms such as DTT or, more broadly, to alternative media access options, including sharing VOD logins or streaming via illegal IPTV devices (e.g., dodgy boxes). However, recent enforcement actions against login sharing and the use of unauthorised IPTV services may limit the attractiveness of these alternatives.

The RED C research findings are consistent with a landscape dominated by satellite, cable, IPTV and, increasingly, smart-TV interfaces. Smart TVs have become especially prevalent, acting as the main gateway for SVOD services such as Netflix and for broadcaster VOD platforms such as RTÉ Player and TG4 Player, alongside linear channels. Access to smart TVs is lower among those aged 65+ (around 54%), but for most other groups, app-enabled TVs are now standard. This means that from the user's point of view, the distinction between "broadcast" and "online" is increasingly blurred: live channels, PSM players and global streaming apps sit on the same home screen and compete within the same user journey.

Radio distribution is at a different stage of transition but subject to similar constraints and opportunities. FM remains the dominant broadcast technology, but space on the FM band for new services is limited. While it could accommodate a quasi-national service and a small number of local and regional services, recent licensing activities and research into the feasibility of a quasi-national/multi-city Irish language youth radio station suggest that FM establishment and operating costs may be a barrier for new entrants. In contrast, DAB+ provides a route to increase capacity and diversify audio offerings. The recent Red C survey evidence suggests that digital radio is still a minority but non-trivial part of the market: about 19% of adults have a DAB set, around 13% of daily radio listeners use DAB/DAB+, and some 9% report using DAB at home. Meanwhile, 31% of daily radio listeners use a radio player app, indicating that IP delivery is already integral to radio consumption, even if much listening still occurs over FM.

These developments for TV and radio sit within a broader spectrum context. The 470–694 MHz ("sub-700") band remains central for Ireland's DTT platform, with the PSM multiplexes carrying RTÉ, TG4 and the national Section 70 television programme service. However, the additional DTT multiplex capacity reserved by ComReg for services to be licensed by Coimisiún na Meán is not currently in use. In contrast, the bands used for DAB/DAB+ are key to the long-term evolution of digital radio. Given the current low reliance on Irish DTT, the capacity constraints on FM, and the diffusion of IP-enabled devices, the medium-term challenge is to design distribution strategies that exploit IP, smart devices and digital radio, while preserving the universal reach that broadcast spectrum provides.

2. Audience behaviour and trust

Second, the observed trends reflect demand-side changes in how people choose to access media, what they value, and which sources they trust. Also here, the RED C survey provides a recent snapshot that aligns closely with the trend trajectories presented earlier.

The most visible shift is from linear to on-demand and time-shifted viewing. Our analysis showed steady declines in linear TV engagement, particularly among younger adults. Younger audiences are overwhelmingly smartphone-first and streaming-led. For them, on-demand viewing, social video and short-form content on platforms such as TikTok and Instagram are central to both entertainment and news. RED C reports that 69% of respondents scroll through social media daily, with engagement concentrated among younger cohorts. For these groups, social feeds increasingly act as the “front door” to audiovisual content, including news and current affairs. Older audiences, by contrast, remain more heavily anchored in live radio and linear TV. Age is not the only differentiator: higher daily usage of live TV is associated with lower social grades, living outside Dublin, single-person households, absence of children and lower levels of educational attainment. Nonetheless, age interacts with location and income to produce a widening gap in consumption habits across cohorts.

Audience fragmentation follows naturally from this. Individuals now assemble their own media mix across multiple platforms and devices: live TV and radio, PSM players, SVOD services, social media, podcasts, music streaming and user-generated content. Loyalty to individual stations or channels is weakening, particularly among younger adults, who are more likely to follow specific formats, creators or communities across platforms.

Radio remains widely consumed and maintains strong daily reach, reflecting ease of access across devices, the absence of subscription fees and strong local relevance. Local and regional stations continue to prove popular, underlining the importance of community-driven content. Around one-third of adults stream audio content daily, with streaming more common among higher social grades and those with higher levels of education, and considerably lower among those aged 55+. Spotify and YouTube are the dominant audio streaming platforms. Interestingly, 34% of daily radio listeners do not have a traditional radio set in their household, indicating that linear radio listening is taking place via a variety of devices (car receivers, smart speakers, phones).

Trust and perceptions of information quality are an increasingly important behavioural driver. Trust in Irish news media is comparatively high by international standards but has weakened over time. The RED C evidence shows that news and current affairs is the area where Irish broadcast services perform best relative to other content, and just over half of the population trust Irish PSM to report news accurately. However, confidence in the independence of PSM is weaker, and recent governance and financial controversies at RTÉ have harmed trust among some audiences and reinforced perceptions of RTÉ as part of “the establishment”. At the same time, trust in media more generally is becoming more complex to maintain, given the rise of AI-generated content and deepfakes, unverified citizen journalism, and social media platforms that prioritise engagement over accuracy. For younger cohorts in particular, social media is the “go-to” source of news; this raises the risk that they bypass independent, regulated media unless that content is made visible and engaging on the same platforms.

The RED C evidence also points to enduring, and in some cases growing, preferences that work in favour of Irish broadcasters. There is a strong appetite for culturally resonant content – including Irish drama, documentaries, cultural events and Irish-language programming – especially among younger viewers, and audiences value shared viewing experiences around live events and national moments as a way of fostering community and conversation.

3. Market structure, competition and business models

Third, structural change in the sector is being driven by intensifying competition for attention and revenue, and by mounting financial and cost pressures on domestic services. Our market analysis highlighted the growing competitive weight of global digital platforms, and the gradual reallocation of advertising spend from TV and radio to other audiovisual sector providers.

The RED C survey also points to specific behaviours that have direct implications for funding models. Subscription TV services are commonly used, but there is also a minority (around 10% of respondents) using "dodgy boxes" or streaming from unofficial sites. While most households with such devices still pay the TV licence, they do so at lower rates than fully compliant households. More broadly, the widespread adoption of SVOD services and paid audio tiers indicates that households are already committing significant budgets to subscription-based content. As discussed above, if the cost of subscriptions increases, households may seek alternative ways to access content, including greater reliance on DTT or other approaches such as sharing VOD logins or reducing the number of subscriptions held. However, recent crackdowns on these practices from VOD organisations mean that it remains uncertain how households will respond in practice.

Overlaying these revenue pressures are rising cost challenges. Recent economic environment increases in energy and transmission costs, staff and freelance rates, and the unit cost of digital content production. Maintaining a multi-platform presence – linear channels, websites, apps, social media, BVOD services and podcasts – requires capital investment in technology and data, as well as ongoing operating expenditure. RED C's evidence that audiences now expect content to work seamlessly across phones, tablets, smart TVs and smart speakers, and that younger audiences in particular discover content through social and short-form formats, reinforces the need for sustained investment in digital products, mobile-first user experiences and social media presence.

These dynamics are pushing broadcasters towards new forms of scale and collaboration. Smaller independent services, in particular, may struggle to fund the necessary digital investment from their own balance sheets; this intensifies incentives for consolidation, strategic partnerships and shared infrastructure, and raises questions about how regulatory frameworks can support sustainable models for plurality and local content.

Finally, the combined effect of these competitive and financial pressures is to reshape innovation incentives. There is a strong push towards multi-platform content strategies – using social clips to drive discovery, commissioning spin-off podcasts, and designing content to be repurposed across linear and digital formats. While this creates new audience touchpoints and can enhance public-value delivery, it also risks stretching resources and crowding out investment in core services if not carefully managed.

4 Options for Future Structure and Policy

4.1 Introduction

This chapter is structured in five sections. The next section summarises the wider Irish policy context relevant to broadcasting and media; Section 4.3 sets out the current regulatory and licensing regime in Ireland by platform and service type; Section 4.4 presents policy options for the future structure and regulation of the sector, including specific options for FM and DTT; and Section 4.5 concludes with a summary of key findings.

4.2 Wider Irish Policy

Ireland's broadcasting and media policy framework is underpinned by a combination of primary legislation, cultural policy initiatives and public funding mechanisms. Ongoing reform is under way, often arising from the recommendations of the Future of Media Commission.

Broadcasting Act 2009

The Broadcasting Act 2009 provides the core legislative foundation for broadcasting policy in Ireland. The Act governs media regulation, public service broadcasting, media development and public funding arrangements, and establishes the overall architecture within which broadcasting services operate. It also provided the statutory basis for the establishment of the Broadcasting Authority of Ireland, the predecessor to Coimisiún na Meán.

The Act envisages three principal strands of broadcasting: public, commercial and community, which shape policy in relation to plurality, diversity, public value and access. It places responsibility on the regulator to develop and implement a licensing plan and defines the categories of broadcasting contracts that may be entered into with service providers. The Act embeds public-interest objectives through provisions relating to ownership and control, programming requirements and advertising limits.

Cultural and Creative Policy

Broadcasting policy operates within a wider cultural framework, for example through the Creative Ireland Programme. Established in 2017 and extended to 2027, Creative Ireland is an all-of-government initiative supported by the Department of Culture, Communications and Sport, aimed at promoting creativity, wellbeing and cultural participation across Irish society. The programme provides important policy context for public support for Irish content, cultural expression and the creative industries, including the audiovisual and broadcasting sectors.

Public Funding and the TV Licence

Irish broadcasters are funded through a mix of commercial and public mechanisms. Commercial television and radio services rely primarily on advertising revenues, while community broadcasters depend largely on public grants and volunteer participation. Public service broadcasting is supported principally through the TV Licence and associated public funding mechanisms, as well as revenue from advertising, sponsorship and direct equity funding.

All households and businesses owning a television set are required to hold a TV Licence, currently priced at €160. However, licence fee income has declined over time. Licence fee receipts received by RTÉ in 2024 were €4 million lower than in 2023, which itself represented a decline of €17.3 million relative to 2022. These trends have intensified policy debate regarding the long-term sustainability of the TV Licence as a funding mechanism for public service media.

Licence fee receipts are distributed primarily to RTÉ and to the Broadcasting Fund, which is administered by Coimisiún na Meán and financed by 7% of net licence fee income. The Broadcasting Fund supports the production of public-interest programming across television and radio services.

The Sound & Vision Scheme, delivered through the Broadcasting Fund, represents a central pillar of public support for Irish content. Sound & Vision 4, announced in 2020, provided investment of over €40 million over three years, with the current round supplemented by an additional €1.5 million in Exchequer funding secured in Budget 2026. The scheme supports high-quality programming focused on Irish culture, heritage and experience, with funding allocated on an 85:15 split between television and radio and a minimum of 20–25% reserved for Irish-language content.

Future of Media Commission and Government Response

The Future of Media Commission (FOMC) was established to undertake a comprehensive review of Ireland's broadcast, print and online media sector and to assess its sustainability over the coming decade. An Coimisiún was tasked with examining funding models, market pressures and the role of public service media.

The FOMC report identified significant long-term challenges, including the structural shift of advertising revenues towards global technology platforms and the growing unsustainability of the TV Licence as a primary source of public funding for public service media. In response, An Coimisiún made a wide range of recommendations, including proposals to reform public funding arrangements, strengthen support for public-interest content and modernise media supports in a platform-neutral manner. Key recommendations included:

- Replacing the TV Licence with a new Exchequer-based funding model for public service media and public service content;
- Maintaining, at a minimum, the allocation of 25% of Sound & Vision funding to Irish-language programming; and
- Converting the Broadcasting Fund into a platform-neutral Media Fund, extended to include news and current affairs and accessible to a wider range of public-interest content providers.

An Coimisiún's work was informed by extensive public consultation, stakeholder engagement and research, including over 800 submissions and multiple thematic dialogues. The report was submitted to Government in September 2021, and in July 2022 the Government accepted, in principle, 49 of An Coimisiún's 50 recommendations.

Implementation and Legislative Reform

Progress towards implementation is ongoing. In April 2025, the Government approved and published the revised General Scheme of the Broadcasting (Amendment) Bill. The Scheme implements a subset of the Future of Media Commission's recommendations, with a focus on governance, accountability and funding reform in public service media.

A central feature of the proposed legislation is the establishment of a platform-neutral Media Fund. The new Fund would support a broader range of schemes, including support for news and current affairs, and would be open to print and online media as well as broadcasters. Funding of €10 million for the Media Fund was agreed for 2025.

In addition to the recently established Local Democracy Reporting Scheme, Courts Reporting Scheme, and Digital Transformation Scheme, alongside planned News Reporting Schemes, the legislation also provides for the development of a Media Access and Training Scheme and further examination of a potential Community Media Scheme. Additional measures include strengthened obligations on RTÉ in relation to independent production commissioning and enhanced transparency requirements, as well as provision for Government approval of any future content production levy on broadcasters and VoD services.

Online Safety and Media Regulation

The Online Safety and Media Regulation Act 2022 represents a further significant pillar of Ireland's media policy framework. The Act established Coimisiún na Meán and dissolved the Broadcasting Authority of Ireland, consolidating responsibility for broadcasting, audiovisual and online safety regulation within a single body.

The Act provides for the appointment of an Online Safety Commissioner and the development of binding online safety codes. In October 2024, An Coimisiún published its first Online Safety Code, setting out systemic obligations for video-sharing platforms to protect users, particularly children, from harmful content. These developments reflect a broader policy shift towards addressing online harms and ensuring greater consistency in protections across traditional and online media environments.

4.3 Regulation and Licensing Regime in Ireland

Ireland's media regulatory framework, established under the Broadcasting Act 2009 and expanded by the Online Safety and Media Regulation Act 2022, encompasses a wide range of services and actors, including traditional broadcast television and radio, digital terrestrial platforms, on-demand audiovisual services, online video-sharing platforms and the independent production sector. Oversight is exercised by Coimisiún na Meán using a combination of licensing, registration, designation and codes, depending on the technology and platform involved.

The framework is structured around transmission technology and distribution platform; regulatory obligations, access rights and funding mechanisms vary significantly depending on whether content is delivered via analogue spectrum, digital terrestrial platforms, third-party networks or internet-based services.

For analytical purposes, the regime can be understood as comprising two broad pillars:

- Spectrum-based broadcasting services, where access to radio frequency spectrum is assigned by the State and licensing is proactive and competitive; and
- Platform-based and online content services, where services are authorised through reactive contracts, registration or designation and are regulated primarily through codes and ex post obligations.

This distinction is particularly important in the context of structural change in audio and audiovisual markets. This section describes the current licensing and regulatory arrangements by platform and service type.

Sound broadcasting analogue spectrum-based licensing (FM and AM)

Traditional radio broadcasting on the FM (and AM) bands is governed by Part 6 of the Broadcasting Act 2009. Services operating on these bands must hold a sound broadcasting contract issued by Coimisiún na Meán, typically under:

- Section 65 (commercial sound broadcasting);
- Section 64 (community sound broadcasting);
- Section 68 (temporary, pilot or institutional services).

These contracts are awarded through competitive licensing processes, initiated proactively by An Coimisiún, reflecting the scarcity of analogue spectrum. A sound broadcasting contract confers the right to use FM or AM spectrum within a defined geographic franchise area and carries a suite of statutory public interest obligations. These include minimum requirements for news and current affairs, Irish culture and language programming, and provision for minority and community interests.

Importantly, FM (and AM) services can only be authorised under Part 6. They do not require, and cannot rely upon, Section 71 content provision contracts, and no alternative licensing route exists under the Act for analogue radio broadcasting.

Digital terrestrial radio (DAB+): separation of platform and service regulation

Digital Audio Broadcasting (DAB+) occupies an intermediate position within the current statutory framework. Unlike FM, individual radio services carried on DAB+ do not receive dedicated spectrum assignments. Instead, spectrum is assigned at the multiplex level, and multiple services are carried within a single digital transmission. The regulatory framework therefore separates:

- The DAB+ multiplex platform; DAB+ multiplexes are authorised under Part 8 of the Act, principally through Section 136, which provides for the licensing of sound broadcasting multiplexes. The multiplex licence is held by the platform operator and governs technical, coverage and operational matters, including the use of spectrum. The current Irish DAB+ trial operates under a temporary or trial authorisation from ComReg, reflecting the exploratory and developmental nature of the platform to date.
- The radio services carried on the multiplex must be authorised as broadcasting services. The applicable authorisation depends on the service's origin:
    - Existing FM services: FM stations holding Part 6 sound broadcasting contracts may be designated for simulcast on DAB+ (under Section 134) and may be carried on a DAB+ multiplex in the relevant franchise areas without requiring a Section 71 contract. Their primary regulatory authorisation remains their FM licence.
    - Digital-only radio services: Services that do not hold an FM or AM licence and operate solely on DAB+ must be authorised under Section 71 content provision contracts. Section 71 provides the legal basis for radio services delivered as part of a multiplex, but it does not confer any rights to carriage or to analogue spectrum.

Content provision contracts and platform-based broadcasting (Section 71)

Section 71 content provision contracts apply to linear television and radio services delivered via third-party platforms, including satellite, cable, IPTV and broadcast multiplexes (DTT and DAB+). These contracts are awarded through an open, reactive process, with applications accepted on an ongoing basis. Section 71 contracts do not assign spectrum, do not provide rights of carriage, and impose comparatively light-touch content obligations focused on compliance with broadcasting codes and rules (programme standards, protection of minors, advertising and sponsorship, accessibility). Annual contract fees apply.

For television, Section 71 provides the principal licensing route for non-national and thematic channels under Irish jurisdiction. For radio, its role is more limited and platform-specific, applying primarily to digital-only services carried on multiplexes.

Digital terrestrial television (DTT): platform-level and service-level regulation

Digital Terrestrial Television (DTT) in Ireland is regulated through a combination of platform-level obligations attached to the operation of multiplexes and service-level obligations attached to individual television programme services. EU Decision 2017/899 obliges Ireland to preserve the 470–694 MHz band for DTT and Programme Making and Special Events (PMSE) use until at least 2030.

Under Part 8 of the Broadcasting Act 2009, Coimisiún na Meán has responsibility for the establishment, maintenance and operation of DTT multiplexes. In practice, RTÉ is currently designated as the operator of the national DTT platform (Saorview). The multiplex operator is responsible for ensuring the technical operation, coverage and resilience of the DTT network; complying with spectrum conditions attached to the use of the 470–694 MHz band; and meeting public-interest requirements linked to universality, continuity of service and emergency communications. While Section 131 of the Act envisages the potential for additional commercial DTT multiplexes, market evidence to date has not supported their development. As a result, DTT has remained primarily a public-service-led platform, notwithstanding the continued statutory reservation of spectrum for broadcasting purposes. The preservation of the 470–694 MHz band for DTT and PMSE limits near-term flexibility in reallocating spectrum and reinforces the importance of a forward-looking policy assessment of DTT's long-term role.

Public service television services on DTT (RTÉ and TG4), as Ireland's public service media television providers, have guaranteed access to DTT multiplex capacity to ensure universal free-to-air availability of core public service content. Public service television services are subject to extensive statutory obligations, including comprehensive news and current affairs provision; Irish-language programming and Irish cultural content; educational programming and content for children and underserved audiences; and commitments to accessibility, including subtitling, audio description and sign language. These obligations are technology-neutral in intent but are currently delivered, in part, through guaranteed carriage on DTT.

National free-to-air commercial television services operate under Section 70 television programme service contracts. Virgin Media Television is the sole current holder of such a contract. Section 70 services are licensed through a proactive process, do not receive public funding, and are subject to defined public-interest obligations tailored to their commercial role, including requirements for news and current affairs, Irish-produced content and compliance with broadcasting codes. Section 70 services benefit from carriage on the DTT platform, supporting wide national reach and free-to-air availability, but do not enjoy the same statutory prominence protections as public service broadcasters. Their obligations and access arrangements reflect a balance between commercial sustainability and contribution to public-interest outcomes.

In principle, television services carried on a DTT multiplex could operate under Section 71 content provision contracts, subject to the availability of multiplex capacity and commercial carriage arrangements. However, in practice, with the exception of Virgin Media 3 and Virgin Media 4, no Section 71 television services are currently broadcast on the Irish DTT platform. All services carried on DTT comprise public service media channels and the national free-to-air commercial television service licensed under Section 70. Section 71 television services under Irish jurisdiction are instead delivered primarily via satellite, cable and IPTV platforms.

Audiovisual On-Demand Media Services (VOD)

Audiovisual on-demand media services constitute a distinct regulatory category under Irish and EU audiovisual law. Providers established in Ireland, which include Discovery, Apple TV, Virgin Media Player, RTÉ Player and TG4 Player, are not licensed in the traditional broadcasting sense but are required to register with An Coimisiún and are entered on a statutory public register.

Registered VOD services are subject to the Audiovisual On-Demand Media Service Code and Rules, which transpose the relevant provisions of the Audiovisual Media Services Directive (AVMSD) into Irish law. These obligations focus on:

- Protection of minors and harmful content;
- Rules on advertising, sponsorship and product placement;
- Accessibility requirements; and
- Compliance with European works obligations, including the requirement that at least 30% of catalogues comprise European works and that such works are given appropriate prominence.

Unlike linear broadcasters, VOD services do not receive guaranteed access to broadcast platforms such as DTT and are regulated in a largely platform-neutral and ex-post manner.

Video-Sharing Platforms (VSPs)

Video-sharing platforms represent a further distinct category within the Irish regulatory framework. Services such as YouTube, TikTok and Instagram are not licensed as broadcasters and are not regulated as audiovisual media services. Instead, Coimisiún na Meán is required to designate platforms under Irish jurisdiction whose principal purpose, or an essential functionality, involves the provision of user-generated or professionally produced video content.

The regulation of VSPs in Ireland is anchored primarily in the Audiovisual Media Services Directive (AVMSD), as transposed through the Online Safety and Media Regulation Act 2022. Once designated, VSPs are subject to Coimisiún na Meán's Online Safety Code, which imposes obligations including measures to protect users (particularly children) from harmful and illegal content; requirements for reporting and flagging mechanisms; age-assurance, parental controls and content-rating tools; and obligations to support media literacy. An important aspect of the Online Safety Framework is the Terrorist Content Online Regulation, which counteracts the dissemination of terrorist content on the internet.[90] Relatedly, five of the six platforms An Coimisiún has labelled as being exposed to terrorist content online since 2024 are also VSPs, such as TikTok and Instagram.

Many designated VSPs are also subject to the EU Digital Services Act (DSA). The DSA applies additional, horizontal obligations relating to illegal content, transparency of advertising and recommender systems, and (for very large online platforms) systemic risk assessment and mitigation. The regulatory approach reflects the nature of VSPs as intermediaries rather than content originators. Oversight is therefore risk-based and outcomes-focused, differing fundamentally from the licensing and content obligations applied to broadcasters.

Independent television production companies

Independent television production companies form a core component of Ireland's audiovisual ecosystem although are not themselves licensed or regulated as broadcasters. They operate under general company and competition law, with their role within the broadcasting system defined indirectly through statutory definitions, commissioning obligations and public funding mechanisms.

The legal definition of an independent producer is set out in Section 116 of the Broadcasting Act 2009, which specifies that qualifying productions must be made by entities that are neither owned nor controlled by a broadcaster. This definition underpins eligibility for statutory commissioning obligations and public funding supports.

Public service media television providers are subject to specific obligations to commission content from the independent sector, most notably through RTÉ's statutory requirement to maintain an

[90] Source: https://www.cnam.ie/industry-and-professionals/online-safety-framework/terrorist-content-online-regulation/

independent productions account. In addition, independent producers may access funding through schemes such as Sound & Vision and any successor media funds introduced under the evolving content levy framework.

While independent producers are not directly regulated by Coimisiún na Meán, their market position is also shaped by Ireland's media merger and plurality regime, which applies a case-by-case assessment to transactions involving broadcasters, publishers and production companies, in order to safeguard diversity and prevent excessive vertical integration.

4.4 Market Capacity and the Potential for Additional Services

The analysis highlights a sector operating within tightening structural parameters. While there is important diversity across service types (national, regional, local and community; television and radio), both total revenue and its main component, advertising income, have exhibited limited real growth in recent years. Against this backdrop, the question of how many additional television or radio services the Irish market could sustainably support must be approached with caution.

A central consideration is the high degree of structural uncertainty currently characterising the broadcasting ecosystem. As outlined throughout this report, the sector is undergoing rapid technological change, evolving patterns of audience engagement, and intensifying competition from global digital platforms. Linear listenership and viewership trends, the growth of IP-based delivery, and the expansion of on-demand and streaming services all introduce volatility into traditional revenue models. These dynamics make any forward-looking assessment of sustainable service numbers inherently uncertain.

Advertising revenues, which represent a core funding source for commercial television and radio operators, have been broadly flat in aggregate terms over the period examined. In a static demand scenario, the introduction of additional services would, all else equal, dilute existing advertising revenues across a larger number of operators. Absent a commensurate expansion in the total advertising market or a material shift towards alternative revenue streams, this would reduce average revenues per service and potentially undermine viability, particularly for smaller operators with limited economies of scale and diversification.

However, the impact is not necessarily linear. The potential introduction or expansion of DAB+ services, for example, could facilitate the development of more specialised or niche offerings. While such services may initially compete for existing advertising expenditure, there is also scope for market expansion if new formats attract new audiences, sponsorship arrangements, or other revenue sources. The net effect would depend on the elasticity of advertising demand, the capacity of new services to differentiate content, and the ability to secure diversified income streams.

The sustainability of additional services is contingent on a range of interrelated factors, including:

- Cost structures: Services with high transmission and distribution costs relative to their addressable market face greater viability risks. Digital distribution can lower certain barriers to entry, conditional on overall costs aligning with realistic revenue expectations. Smaller local and community services are particularly sensitive to fixed cost burdens.
- Revenue diversification: Competitive pressure from global platforms places downward pressure on traditional advertising income. Operators with diversified revenue bases (e.g., digital advertising, sponsorship, branded content, partnerships, events, membership models

or public funding supports) are likely to be more resilient. The feasibility of diversification varies materially by service type and scale.

- Scale and collaboration: Shared transmission infrastructure, joint content production, and collaboration on sales and technology can improve cost efficiency and enhance sustainability without necessarily requiring consolidation of ownership. Such approaches may be especially relevant for local and community services.
- Audience positioning and content differentiation: The viability of additional services will depend on their ability to address identifiable audience gaps or underserved niches, as replicating existing formats may not be sufficient to support market entry. In a small and mature market such as Ireland, content overlap is likely to intensify competitive pressures. The Value of Independent Media report[91] investigated the views of 18-34-year-olds on potential gaps or opportunity areas, including: nostalgic content, 'uncensored' comedy, relatable youth-focused content, quality Irish drama, youth representation and more niche genres (radio).

It is important to emphasise that questions of market capacity should inform, but not predetermine, future licensing strategy. The evidence indicates that sustainability in the Irish market will depend less on a fixed numerical limit and more on the design of regulatory frameworks, the calibration of licensing conditions, and the capacity of individual services to adapt to evolving technological and commercial realities. Policy choices should therefore be guided by competitive implications and public value objectives, and should not be framed around a static numerical cap on service numbers.

4.5 Policy and Regulatory Options for Future Development of Sector

Stakeholder engagement undertaken as part of this study highlighted a shared view that the current regulatory and licensing framework was designed for a predominantly linear broadcasting environment and may no longer be fully aligned with the realities of a rapidly evolving media landscape. Stakeholders pointed to uneven regulatory obligations across platforms, rising cost pressures, and increasing difficulty for smaller providers to fund the transition towards digital and hybrid distribution models. Many emphasised the need for a more agile and proportionate regulatory and licensing system that supports innovation, promotes diversity and accessibility, and ensures a level playing field with large online platforms that currently operate with fewer domestic obligations.

Concerns were also raised about the sustainability of existing funding models, the implications of consolidation, and the growing challenges posed by online harms, algorithmic distribution and declining referral traffic for news publishers. While views differed on the relative importance of broadcast and IP-based delivery, stakeholders underlined the need for clear long-term policy direction on both DTT and DAB+ to ensure that future regulation is balanced and capable of supporting plurality, quality, and local cultural programming in the sector.

The remainder of this section discusses stakeholder views on FM, DTT, and DAB and proposes policy options for consideration.

Future of DTT and Regulatory Approaches

The evidence presented in earlier chapters shows that DTT now represents only a small component of Ireland's television distribution landscape (see Figure 2.13). In July 2025, Irish DTT was available in 35% of households. However, penetration of Irish DTT as the primary means of reception has stabilised at approximately 12% of households, with the predominant modes of consumption

[91] Bricolage, 2025. Value of Independent Media. Research Project Debrief for Coimisiún na Meán.

occurring through satellite, cable, and increasingly IPTV. The use of DTT is declining throughout Europe, and DTT accounts for a smaller share of viewing and plays a smaller role in Ireland than in other European markets.

A number of stakeholders engaged as part of this study expressed an interest in the progression of DTT, but some have also noted that rising costs and changing audience preferences point to the need for clear long-term policy direction for the platform, as audiences increasingly move toward on-demand services and the economics of maintaining DTT may become less favourable over time. At the same time, some respondents emphasised the continuing value of terrestrial, free-to-air services for affordability, universality and public value outcomes, highlighting the need for a coherent policy approach that supports both sustainability and access.

Section 131 of the Broadcasting Act originally envisaged the development of multiple commercial DTT multiplexes. Market evidence suggests, however, that current and projected trends do not support the viability of commercial DTT in Ireland, and these multiplexes are therefore unlikely to be activated. Nonetheless, the associated UHF spectrum allotments remain assigned to broadcasting television in ComReg's National Frequency Plan. This reflects wider legal and regulatory constraints: under EU Decision 2017/899, Member States are required to preserve the 470–694 MHz band for DTT and PMSE use until at least 2030. As a result, unused multiplex capacity cannot be reallocated in the short term, even where domestic market conditions no longer support substantive terrestrial expansion. This situation highlights a gap between existing licensing policy and statutory spectrum assignments and the economic reality of audience behaviour and industry investment.

International analysis reinforces the expectation that DTT will face sustained structural decline in the coming decade. Ofcom anticipates that even in a market where DTT is widely used, as is the case in the UK, viewing through DTT is expected to fall sharply. These projections reflect both generational changes and the economics of multi-platform delivery, which increasingly favour IP-based distribution. Irish evidence points in the same direction, with smart-TV usage rising, BVOD platforms expanding and younger cohorts displaying diminishing interaction with DTT services. Against this backdrop, maintaining a terrestrial platform with significant unused capacity raises questions concerning long-term sustainability, efficiency and the opportunity cost of spectrum reservation.

At the same time, there is a need to preserve universality for the groups that continue to depend on broadcast reception. Any future Broadcasting Services Strategy must therefore consider how best to balance universality, technological change, spectrum efficiency and long-term sustainability. The policy options outlined below reflect different ways of striking this balance. These options are not mutually exclusive and could be pursued sequentially or in combination.

Option 1: Maintain the current DTT framework

One option would be to maintain the existing DTT framework broadly as it operates today, with continued operation of the national DTT platform and no significant change to its scope or configuration. Under this approach, DTT would remain a core element of Ireland's television distribution landscape, notwithstanding its declining audience share.

The rationale for this option is to preserve a universally available, free-to-air broadcast platform, supporting resilience and access for households that continue to depend on terrestrial reception. It is also possible that ongoing cost-of-living pressures may prompt some households to cancel pay-TV or streaming subscriptions and revert to free-to-air DTT services, strengthening the case for retaining DTT as a reliable, no-cost alternative for viewers.

However, this approach would imply ongoing acceptance of declining utilisation and under-used capacity and would require continued policy support for a platform whose relative importance is diminishing over time.

Option 2: Lean DTT configuration focused on core public-interest services

An alternative approach would involve maintaining a lean DTT configuration, centred on the delivery of a core set of public-interest services. This option would reflect actual audience usage patterns while continuing to meet the State's obligations in respect of universality of access to public service media.

Under this model, public service television channels and the national free-to-air commercial television service would continue to be available via the terrestrial platform. There would be no requirement to make additional DTT multiplexes potentially available beyond those currently operated by RTÉ. For independent broadcasters, this option would preserve certainty of terrestrial distribution for a limited number of national free-to-air services, while recognising that the current market context does not support expansion of DTT capacity as a viable route for additional independent television services.

Option 3: Platform-neutral universality and public-value framework

A further option is to develop future policy around a platform-neutral universality and public-value framework, ensuring that access to trusted public-interest content is preserved as distribution shifts from DTT towards connected and on-demand environments. Under this approach, policy would focus on outcomes (universal access, diversity of viewpoints, Irish-language and culturally relevant content, and the contribution of trusted media to democracy and public participation) without privileging any single transmission technology. This would mean establishing obligations to ensure that core public-interest services remain available, easy to find and straightforward to use across the platforms through which audiences increasingly access audiovisual content: terrestrial, where relevant, but also IPTV, connected TV operating systems, app stores, electronic programme guides, and voice-activated interfaces. For example, a prominence and discoverability regime could ensure that designated public-value services are not disadvantaged by commercial ranking, recommendation systems or interface design choices, and that audiences can easily locate these services in smart-TV environments and other new technologies.

Option 4: Post-2030 review of the 470–694 MHz band

A medium-term strategic option involves planning for the post-2030 period by re-evaluating Ireland's approach to the 470–694 MHz band once current EU protections expire. As the opportunity cost associated with continued reservation of the band for DTT is expected to increase over time, a future review could assess the economic, social and cultural merits of alternative uses that may preserve a minimal broadcast layer while freeing part of the band for other applications. This process would need to align with developments in European spectrum policy, including any successor framework to Decision 2017/899, and would require detailed analysis of access and digital inclusion requirements to maintain universality and ensure that no groups are left behind as viewing shifts to IP-based delivery. It would also require appropriate planning to ensure that IP-based distribution can meet continuity standards comparable to those historically associated with broadcast platforms; for instance, emergency messaging arrangements, capacity and congestion management during peak periods or network disruption.

Future of FM

FM continues to be the primary broadcast platform in Ireland, but the remaining FM spectrum is now limited. Although the band is close to capacity, some spectrum is still available and could support a quasi-national service along with a small number of additional regional and local stations. However, recent licensing activity and feasibility research on a potential quasi-national or multi-city

Irish-language youth service indicate that the costs of establishing and operating FM services may pose a significant barrier for new entrants. Based on an assessment of the existing spectrum and newly identified assignments, three potential future FM network configurations have been outlined, as summarised in Table 4.1:

- Option 1 provides capacity for one quasi-national network and a small number of regional services and targeted local coverage.
- Options 2 and 3 do not include a national network. Instead, they maximise the availability of regional and local services. Option 2 offers the greatest expansion for mid-scale operators, regional advertising markets, and cross-county networks. Option 3 places the strongest emphasis on local services, including two distinct Dublin commuter-belt networks.

Table 4.1: Summary of Future Options for FM

Option	National	Regional	Local
Option 1	• Quasi-national service which could include Gaeltacht areas	• Regional South-East service (assignments already agreed)	• Cork City and (part) County • Dublin and Commuter Belt • Galway City and potentially some of Connemara • Waterford City and (part) County
Option 2	-	• Regional South-East service (assignments already agreed) • Regional service covering Galway, Clare, Limerick, Cork and part of Kerry or divisions of the above • Regional service for Wexford, Waterford and parts of south Carlow/Kilkenny • Regional service similar to iNW (but with less coverage in Galway)	• Cork City • Dublin and Commuter Belt (up to Dundalk) • Galway City and potentially some of Connemara
Option 3	-	• Regional South-East service (assignments already agreed) • Regional service covering Galway, Clare, Limerick, Cork and part of Kerry or divisions of the above	• Cork City • Dublin and Commuter Belt 1 • Dublin and Commuter Belt 2 • Galway City and potentially some of Connemara • Waterford City and (part) County

Source: An Coimisiún

Potential DAB+ Policies

While the FM spectrum in Ireland can potentially facilitate a small increase in radio services, it is limited in its growth potential. Therefore, it is not possible to rely solely on FM for future audio licensing activity and sector growth. An Coimisiún has been exploring other delivery options which could facilitate the expansion of the radio sector, including DAB, which has proven to successfully complement AM/FM in many European countries.[92]

DAB exhibits a number of favourable technical and market characteristics. While FM provides a high-quality service, it only allows one service per frequency. DAB Radio uses digital technology that combines several stations into a multiplex group. In addition, it was found that DAB transmission significantly reduces the cost of entry, supporting competition, plurality and diversity in the sector. From an environmental sustainability perspective, DAB+ uses less energy per service than the equivalent FM network. This efficiency could be 25% to 30% for a multiplex operating at full capacity.

In December 2024, ComReg granted a Test and Trial licence to Foothold Communications to operate a multiplex for a DAB+ Trial in the Leinster region for one year.[93] As of 17 April 2025, 13 applications have been submitted to An Coimisiún for 26 new radio services. A small number of FM services available in the Dublin area are also on DAB+ simultaneously, including Newstalk, Q102, Radio Nova, Today FM, Spirit Radio, and Spin 1038.

If not simulcasting existing stations, broadcasters wishing to join the trial require a content provision contract under Section 71. Unlike Section 65, which is the sound broadcasting contract that is awarded by An Coimisiún via a competitive public process, Section 71 is a reactive license (applicants can apply at any time) that is less prescriptive than Section 65. As a policy decision to date An Coimisiún has required new radio services under Section 71 to provide 20% news and current affairs, but applicants can apply for a derogation from this requirement.[94] The vast majority of services in the current DAB trial were allowed full or partial derogations due to the trial nature of the service.

An Coimisiún has adopted an open and flexible licensing regime for the purposes of this Trial. However, if DAB were to be permanently integrated into Ireland's media landscape, careful consideration would be required regarding the appropriate level and form of regulation applicable to DAB broadcasters. Stakeholder consultations revealed mixed views on the appropriate regulatory treatment of DAB+, with some respondents highlighting the risk of regulatory asymmetry between FM and DAB+ services, while others emphasised the need for differentiated approaches to reflect differences in scale, cost structures and market maturity.

Broadcasters operating under Section 71 are subject to application and annual licence fees that were designed primarily with larger broadcasting services in mind. Stakeholders noted that the cost structure associated with Section 71 licences can represent a significant barrier to entry for smaller-scale and start-up services, particularly those seeking to operate on DAB+ multiplexes. In the UK, the DSP licence, which is a comparable licence to that of Section 71, attracts a non-refundable application fee of £250 and an annual fee of £100. This contrasts with the €1,500 non-refundable application fee for Section 71 contracts in Ireland, followed by an annual fee of €2,000 for each year the service is licensed.[95] However, for the purpose of the DAB Trial, An Coimisiún reduced the applicable fees by 75% for sound broadcasting contractors for the duration of the trial.

While some stakeholders suggested that a more proportionate regulatory approach for DAB+ could help address these barriers, by removing the news and current affairs regulation for small, niche broadcasters, others highlighted the risk of creating regulatory asymmetries with FM services. It was also noted that significant deregulation of DAB+ in isolation may be difficult to justify without parallel consideration of the FM framework. As a result, stakeholders emphasised the importance of

[92] DAB broadcasts have been launched and successfully operated in several countries in the EU. Norway and Switzerland have "switched off" FM and moved entirely to DAB.

[93] DAB+ represents an enhanced evolution of the DAB standard and, given the relatively limited level of investment in DAB to date, Ireland is well placed to focus future development efforts on DAB+.

[94] Derogations are also permitted for niche, music driven and youth-targeted FM stations.

[95] Source: https://www.cnam.ie/app/uploads/2025/02/20250219_S71-Guide-and-App-2025_vFinal.pdf

examining a broader range of mechanisms to support migration from FM to DAB+, including alternative licensing models and fee structures.

The use of small-scale DAB has facilitated the migration of community, community-of-interest and institutional services from FM to DAB in other jurisdictions. By enabling multiple services to operate within a single multiplex, DAB is particularly well suited to small-scale, niche and music-led services, including those with limited commercial capacity. Evidence from other markets suggests that such services can be attractive to younger audiences, offering differentiated content and an alternative to on-demand streaming and podcast services. In this context, it is notable that An Coimisiún (and its predecessor, the BAI) has previously signalled openness to niche and Irish-language services, and to exploring the regulatory basis on which such services could be licensed and sustained.

However, challenges remain in relation to audience awareness and uptake of DAB+. Experience in the UK indicates that the mere simulcasting of existing FM services on DAB is insufficient to drive digital listening, and that active promotion and service differentiation are critical to uptake. While DAB receivers are increasingly standard in new cars across Europe, research by RED C (2025) indicates that while 19% of Irish households have access to a DAB/DAB+ receiver at home, 9% of households actually use DAB/DAB+ to listen to music and audio content at home. An Coimisiún commissioned a report into the Value of Independent Media in 2025[96] which found that unaided awareness of new DAB stations remains low, although prompted awareness revealed significant interest in genre-specific and niche services, which DAB is well placed to deliver.

Expression of interest in new sound broadcasting services

In October 2025, Coimisiún na Meán invited submissions from parties interested in providing new commercial sound broadcasting services. An Coimisiún was open to suggestions regarding the nature of the service, the models upon which such services might be licensed (e.g., FM, DAB+), and the areas and audiences to be served by such additional services. An Coimisiún received 22 expressions of interest, indicating the demand for the development of new radio services and the expansion of the radio sector. Overall, there was a strong shared view that the future of broadcasting in Ireland needs an expansion of diversity of choice and content and that DAB offers unparalleled opportunity for this. Discussed below are the key findings from the expression of interest:

- There was a high level of interest in developing new sound broadcasting services amongst respondents, especially if the service was operating under a DAB+ model. By developing a framework that allows DAB+ multiplexes to be licensed on a regional/local level, with affordable fees and appropriate obligations, many respondents suggested that this will help plurality, financial sustainability, participation, and diversity.
- Many submissions suggested that the current Section 71, which would likely be the most comparable licence to that for DAB licences as it is reactive and encourages additional radio and television services outside of competitive licensing on FM, is not well suited for small-scale broadcasters or DAB multiplexes which are intended to carry a wide variety of niche and community voices. This is because of the current fees and news obligation97 under Section 71, which act as barriers to entry for smaller operators. Many propose a new licence model more similar to the UK DSP and C-DSP licences, which have lower annual fees than Section 71. This reduction in price would enable small-scale services to broadcast on DAB+.
- In contrast, some submissions highlighted that any new commercial services would require careful planning to not undermine the viability of the existing FM services.

[96] Bricolage, 2025. Value of Independent Media. Research Project Debrief for Coimisiún na Meán.
[97] Source: Radio contractors are required to ensure that no less than 20% of the broadcasting time is devoted to news and current affairs content.

- Concern arose among some respondents as the development of DAB may take up to 10 years before it becomes commercially viable. This could impact their advertising revenues in the short to medium term and increase reluctance to make the switch to DAB+ if their audience has not yet switched.
- Some suggested that any new services licensed in the future by An Coimisiún should only be permitted on DAB+ (and not on FM). This would protect existing local services that are already exposed to high levels of competition.
- Should small-scale DAB not be introduced, some suggested a concept called micro-broadcasting for FM. This would provide small, niche broadcasters a reactive licence that would be less regulated for news provision and cheaper than Section 71. To address the limited space on FM, it was suggested that An Coimisiún could reserve spectrum for this style of broadcasting.
- There was much discussion on the Commuter Belt, specifically that the area be expanded to a wider area.
- Many suggested that they would want their new sound broadcasting service to be on DAB; however, they would apply for a temporary FM licence, with the sole intention of promoting their channel on DAB+.

Future Development of DAB+

The analysis undertaken as part of this review indicates that DAB+ could play an important role in the future development of Ireland's radio sector. While FM remains the primary radio distribution platform, available FM spectrum is limited and offers only limited scope for further expansion. By contrast, DAB+ can add capacity, support new services, and create opportunities for greater plurality and diversity in the audio sector.

Evidence gathered through stakeholder engagement, the DAB+ trial, and the Expression of Interest process highlights strong interest in the potential development of digital radio services. Stakeholders identified opportunities to expand niche, community, Irish-language, and other specialist services, while also emphasising the importance of ensuring that any future framework is proportionate, sustainable, and aligned with the economic realities of digital broadcasting.

At the same time, the research highlights several issues that would require further consideration in the context of any future DAB+ framework. These include the relationship between FM and DAB+ services, the appropriate level of regulatory obligations, the cost of participation for broadcasters, sustainable financial models, the role of multiplex operators, the needs of smaller and community services, and measures to support audience awareness and uptake of digital radio.

International experience shows that no single model exists for developing DAB+ radio. Different jurisdictions have adopted different approaches, reflecting national circumstances, market structures, audience behaviour and policy objectives. The evidence reviewed as part of this study suggests that the most appropriate approach for Ireland will require careful consideration of these factors, informed by both the experience of the Irish DAB+ trial and ongoing engagement with stakeholders.

Given the distinct policy, market licensing and regulatory considerations associated with DAB+ radio, An Coimisiún intends to undertake a separate consultation process on DAB+ licensing. This work will progress independently of the Broadcasting Services Strategy review and will give stakeholders a dedicated opportunity to consider the future licensing, regulatory, and operational framework for digital radio in Ireland. Findings from that process will inform any future decisions regarding the long-term development of DAB+ services and infrastructure.

4.6 Summary of Key Findings

The key findings from this Section are summarised below:

- The Broadcasting Act 2009 and the Online Safety and Media Regulation Act 2022 are two important Acts related to media and broadcasting. The 2009 Act governs media regulation, issues relating to public service broadcasters, media development, and public funding across three strands of broadcasting: public, commercial and community.
- The 2009 Act imposed a range of advertising and programming regulations on sound and visual contracts, as well as a range of contractual conditions on broadcasters. These include:
    - Limits on the ownership and control of broadcasting services;
    - The statutory 20% news and current affairs requirement on commercial and community radio services; and
    - The amount of advertising time available to certain broadcasters.
- The Government has approved the implementation of 49 of the 50 recommendations from the Report of the Future of Media Commission, enhancing accountability, transparency, and value for money in Irish PSMs. Included is the approval to convert the existing Broadcasting Fund to a platform-neutral Media Fund. The conversion of the Broadcasting Fund into a wider Media Fund provides a broader range of supports for the media sector, as funding will be made available for six new schemes.
- There is a range of licenses available for sound and audiovisual broadcasters through competitive licenses (e.g., Section 65 sound broadcasting contracts). Additionally, Section 71 is available to broadcasters as a content provision contract.
- Video-on-Demand services are not licensed in the traditional broadcasting sense but are required to register with Coimisiún na Meán and are entered on a statutory public register.
- Video-sharing platforms represent a further distinct category within the Irish regulatory framework. Services such as YouTube, TikTok and Instagram are not licensed as broadcasters and are not regulated as audiovisual media services. Instead, Coimisiún na Meán is required to designate platforms under Irish jurisdiction whose principal purpose, or an essential functionality, involves the provision of user-generated or professionally produced video content.
- The FM spectrum in Ireland can only facilitate a limited number of additional radio services. DAB exhibits a number of favourable technical and market characteristics that complement FM.
- In December 2024, ComReg granted a Test and Trial licence to Foothold Communications to operate a multiplex for a DAB+ Trial in the Leinster region for one year (extended for a second year). Digital broadcasters not already on an FM contract wishing to join the trial require a content provision contract under Section 71.
- An Coimisiún has adopted an open and flexible licensing regime for the purposes of this Trial. However, if DAB were to be permanently integrated into Ireland's media landscape, careful consideration would be required regarding the appropriate level and form of regulation applicable to DAB broadcasters.
- There was a high level of interest in developing new sound broadcasting services amongst respondents to an expression of interest in new sound broadcasting services, especially for services operating under a DAB+ model. However, challenges remain in relation to audience awareness and uptake of DAB+.

- There are a number of options to consider for the future of DTT and FM. For DTT, options include maintenance and platform neutrality approaches.
- When considering the future of FM, there are three options to consider for optimising the use of the remaining spectrum. The analysis highlights the potential role of DAB+ in supporting future development of the radio sector. Given the distinct policy, licensing and regulatory considerations involved, An Coimisiún intends to undertake a separate consultation process on the future development of DAB+ and a potential licensing roadmap.

5 Overall Conclusions

Ireland's independent broadcasting sector is a valued and distinctive component of the wider media ecosystem, supporting plurality, local and regional identity, and trusted provision of news, current affairs and culturally relevant programming. The evidence in this report points to a sector operating within a structurally changing marketplace: audience attention is fragmenting across platforms and devices, on-demand video and digital audio are expanding rapidly, and competitive and financial pressures are intensifying as global platforms capture a rising share of viewing, listening and advertising revenues. Radio continues to retain strong reach and local relevance, and linear television remains important despite clear declines in overall linear consumption.

Across both audio and audiovisual markets, the analysis indicates that market evolution is being driven by a set of interlinked factors: (i) technology, infrastructure and spectrum; (ii) audience behaviour, preferences and trust; and (iii) market structure, competition and business models. The expansion of connected devices (notably smart TVs and smart speakers), the increasing centrality of app-based interfaces, and the growing role of data-driven distribution and discovery are progressively blurring the distinction between "broadcast" and "online" from the audience perspective. These shifts, while creating opportunities for innovation and new service propositions, also raise important questions regarding universality, prominence/discoverability, and the long-term resilience of public-interest media.

From a distribution and spectrum perspective, the report's findings highlight a dual challenge. First, FM remains heavily relied upon and is close to full capacity, constraining new entry and expansion through analogue means. This increases the policy relevance of DAB+ as a potential route to additional capacity, greater diversity of services, and a managed pathway for digital development, provided that the licensing and cost structure is proportionate and aligned with the economics of smaller and niche services. Second, while Irish DTT accounts for a relatively modest share of households, it remains relevant for specific cohorts (particularly older audiences) and continues to provide a resilient, free-to-air pathway for core services.

Against this backdrop, the options set out in Chapter 4 are intended to support an evidence-based and proportionate approach to the future structure, regulation and licensing of the sector. The choices available involve trade-offs between universality, efficiency, administrative burden, market dynamism and long-term sustainability. Overall, the evidence supports the need for a Broadcasting Services Strategy that is both adaptive and future-facing: anchored in public-value outcomes (plurality, trust, Irish cultural and linguistic expression, accessibility, and democratic participation), whilst also being sufficiently flexible to respond to rapid shifts in technology, audience behaviour and market economics. The analysis indicates that clear policy direction will be critical to reducing uncertainty, supporting investment, and ensuring that Ireland's independent broadcasting sector can remain resilient and relevant in an evolving media environment.

Annex 1 List of References

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