



Comments on the RSPG report RSPG10-349 "Future of Radio Broadcasting in Europe"

BNE is the association of broadcast network operators in Europe. The association includes among its 14 member companies all the major broadcast network operators in Europe serving 25 European countries.

More information about BNE can be found on www.broadcast-networks.eu

BNE welcomes the initiative of the RSPG to monitor the digitalisation of radio across Europe and appreciates the opportunity to express its view on the RSPG Report "RSPG10-349 Future of radio broadcasting in Europe".

BNE generally supports the main findings in the report and would in particular like to endorse the following proposals and recommendations put forward by RSPG. In addition, some proposals for additional clarification and recommendations are given.

1. A common EU Strategy

BNE fully endorses the proposal to develop a common EU strategy for digital radio. In addition to the RSPG proposal it would be beneficial to include a recommendation regarding a strategy and possibly preconditions for analogue switchover decisions which could be used by the regulatory bodies among the Member States. A common strategy for switchover would be beneficial to the European digital radio development.

2. More certainty about digital radio technologies is needed

BNE would like to add that the European standard Eureka 147 (including T-DAB, T-DAB+ and T-DMB) is the most widely spread digital radio standard in Europe and already implemented in several markets. A recommendation for pan-European digital receivers should be based on this standard.

3. The RSPG recommends that EC should indicate that the BAND III (174-230 MHz) is envisaged to be used also for the introduction of digital radio broadcasting on the basis of the Geneva06 agreement and that in some member states parts of the band 230-240 MHz may also be used on the basis of the Wi95CO7 agreement

BNE strongly supports this recommendation.

As described in the report the lack of frequencies in the FM band and the limitations of analogue technology are the reasons that analogue radio broadcasting in Europe offers no further development.

IP-based radio distribution has slightly changed the situation: more services and new features are available and will to some extent weaken the position of the incumbent broadcasters. But if IP-based radio reception gets popular broadcasters will face a cost problem. Every new listener will increase the distribution costs.

The success of FM radio is based on the overall availability, free and easy access. Currently there are no indications that IP-based radio distribution will be a commercially viable alternative. In order to stay competitive in the long term terrestrial radio has to



move to digital distribution to offer more services and new features. Multiplex based digital distribution systems like the European DAB-family will decrease the distribution costs and the necessary transmitting power significantly. New features like additional data services can easily be implemented.

A further aspect is the possible chaining of radio and telematic service distribution, providing a common distribution platform offering also traffic and telematic information everywhere. Nearly all over Europe Band III is available for digital terrestrial radio and this frequency band offers good conditions to achieve full area coverage for reasonable costs. Advanced telematic services need much more transport capacity than FM networks offer by RDS. The increasing traffic all over Europe and the upcoming electric mobility need an efficient distribution of traffic data to steer the traffic flow. Digital Radio networks offer this capacity at a comparably low price.

Due to the successful launch of DAB/DMB in e.g. UK, Denmark, Switzerland, Australia, Korea and other countries in Asia a huge variety of commercial receivers is available for every market segment. Other Administrations (like Italy) have planned the introduction of DAB/DMB taking advantage of the ongoing switch off of analogue TV which will make available the amount of frequencies required for an effective introduction of the new technology from a market point of view. More over Italy, having evaluated the great importance of availability of "good" receivers, has planned to introduce a certification system both to help the users in the choice of the best radio for their need and to minimize the introduction in the market of very poor quality receivers. Nearly every car manufacturer in Europe offers DAB/DMB receivers as a standard option.