

RADIO SPECTRUM POLICY GROUP
-
DRAFT WORK PROGRAMME 2011
-
AER POSITION

The Association of European Radios (AER) is a Europe-wide trade body representing the interests of over 4,500 commercially-funded radio stations across the EU27 and in Switzerland.

AER is located at: Association Européenne des Radios
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AER's Interest Representative Register ID Number is 6822083232-32.

AER's main objective is to develop and improve the most suitable framework for private commercial radio activity. AER constantly follows EU actions in the fields of media, telecommunications and private radio transmission, in order to contribute, enrich and develop the radio sector. AER therefore warmly welcomes the opportunity to express its views on the draft work 2011 programme of the Radio Spectrum Policy Group (RSPG).

AER would like to recall that, regarding radio broadcasting, the following key points are essential:

- **no universal switch-off date for analogue broadcasting services should be envisaged at EU level and decisions on standards to be used for digital radio broadcasting should be left to the national markets**
- **any shift towards digital radio broadcasting will most likely require a very long process. Decision on the adequate time-frame should be left to each national industry: as a matter of principle, transition to any improved digital broadcasting system should benefit from a long time-frame, unless there is industry agreement to move at a faster rate**
- **access to bands II, III and L should be preserved for radio broadcasting**
- **exceptions to market-based approaches to spectrum management in the bands mentioned above should be maintained**

AER remains available to explain this position in further details. More information can also be found in AER's position on this issue, replying to the forthcoming RSPG consultation on the Future of Radio Broadcasting (based on Report RSPG10-349).

ENDS
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On-air broadcasting radios reach massive audience on a daily basis in all EU Member States: between 60 and 85% of the EU population on average listens to radio for at least 2 or 3 hours per day, as shown by national audience measurement.

Commercially-funded radios indeed constitute a unique network of small and medium-sized enterprises (SMEs), contributing to cultural diversity, media pluralism, access to creativity, social inclusion. They also offer free-to-air services of general interest:

- *they evolve in highly competitive environmentsⁱ*
- *their programmes encompass, broadly speaking, all possible formats, from debates to music-onlyⁱⁱ*
- *As for the music broadcast, within one market, as soon as there is demand expressed, it has to be fulfilled; so, most of the musical expressions are represented*
- *most of them are non-politically affiliated, and certainly keep the freedom to express their opinion or to participate to the public expression of the opinions of their listeners*
- *their audiences are local, regional, or national*
- *they strive to develop on all possible platforms*
- *during natural, major or minor disasters, radio is the first – and possibly the only remaining – tool to inform the publicⁱⁱⁱ*

Radio is the most intimate medium, and has been so for the past 50 years at least: it is indeed ubiquitous, mobile, simple-to-use and free-to-air. All these features enable our audience to cultivate a personal relationship with our programmes, our DJs, our hosts, and our brands. Our listeners thereby access programming they enjoy, useful / crucial information^{iv}.

ⁱ For example, and bearing in mind that the amount of radios in a given country depends of course on its size: Spain now has more than 2000 frequencies used across the country; similar FM situations can be observed in France or Germany

ⁱⁱ To give just examples, please see:

- the French AER Member, SIRT : <http://www.sirti.info/spip.php?page=adherents>

- the UK AER Member, RadioCentre:

<http://www.radiocentre.org/rc2008/stationSearchResults.aspx?searchType=fullmembers>

ⁱⁱⁱ For example: in the UK in December 2009, during the Cumbria floods, to keep their communities and other media outlets informed, Commercial Radio in the area began rolling news and updates during events that occurred a fortnight ago and the on-going clean up operations. As soon as the situation started unfolding, both CFM Radio and Lakeland Radio dropped their usual formats and presenters and switched to a service of news, travel, weather updates, advice and other information to help the local community. For more details, please see here: <http://www.radiocentre.org/rc2008/showContent.aspx?pubID=341>

More recently, during the "Love Parade" at the end of July 2010 in Duisburg, Germany, the mobile phone network collapsed very fast. However, radios' network remained

The most recent example was this morning when you had to avoid constructions on your way to work

^{iv} For instance, in the UK, London's Capital 95.8 won a Sony Award for its 'Lights Out London' initiative, which drew support from celebrities such as Justin Timberlake and politicians like the UK's former Secretary of State for the Environment, Rt Hon David Miliband MP. This involved encouraging listeners to switch off lights when they weren't needed. In Germany, Saxony's Radio PSR was awarded the 2008 central Germany radio prize by the IHK Leipzig for its feature on Climate Change: "Die Radio PSR-Klimaoffensive: Was trägt bei zum Treibhauseffekt?"

Please see here: <http://www.radiopsr.de/7719/music/news/89143>