

AER COMMENTS ON THE RADIO SPECTRUM POLICY GROUP (RSPG) OPINION ON A RADIO SPECTRUM POLICY PROGRAMME (RSPP)

AER supports a multi-platform future for commercial radio: ensuring reception of terrestrial free-to-air analogue and digital broadcasting, complemented by online transmission, is crucial to maintain a healthy radio market in Europe. To this end, spectrum capacity for the sub 700 MHz band should be secured for radio, through frequency allocation decisions taken at national level, with multi-standards solutions allowing listeners to access radio via all possible devices.

ABOUT US

The Association of European Radios (AER) is the Europe-wide trade body for commercial radio, representing the interests of companies operating over 5,000 commercial radio stations to the EU Institutions. AER promotes the development of commercially-funded radio broadcasting in Europe, by ensuring a fair and sustainable economic framework for radio so it can continue to thrive.

CONTEXT

The Radio Spectrum Policy Group (RSPG) published on 15 February 2021 its Opinion on a Radio Spectrum Policy Programme (RSPP). AER welcomes the work presented by the RSPG and the mention of Audio-Visual **(including radio)** Media, as being identified among the sectors for which sufficient spectrum availability is a priority. We call for an Opinion that would not endanger the future viability of commercial radio.

Radio provides significant social and public value, reaching large and diverse audiences across Europe. Its mix of music, news, entertainment and speech is highly valued by listeners who constantly identify radio as the most trusted medium in Europe. The multitude of commercial radio stations present on the European scene bring cultural diversity and media pluralism: radio must remain free-to-air to offer listeners quality content.

As radio remains a broadcast medium, relying on free-to-air analogue and digital broadcasting to reach listeners, it is key that the **sub 700 MHz (UHF 470-960 MHz) band remains reserved to broadcasters**. This will ultimately benefit Europe and Europeans, as stressed by EU Legislators in article 45 of Directive EU 2018/1822: radio broadcasting, alongside television, is described as promoting “*cultural and linguistic diversity and media pluralism*”. The termination of the reserved sub 700 MHz band for broadcasters would jeopardise the sustainability of radio broadcasting and the legal certainty surrounding its nature of broadcaster. Furthermore, **radio must be present on all platforms**; 5G broadcast is an important distribution perspective for radio broadcasters that would bring broadcast-radio to mobile devices.

SAFEGUARD ACCESS TO SPECTRUM FOR RADIO

Commercial radio listening in Europe is still mainly done through analogue and digital broadcasting, and operators continue to rely on a licensing model as a right of use of spectrum. Thanks to its broadcasting nature, commercial radio maintained its strong presence during the COVID-19 pandemic and played a unique and important role in times of emergency.

Although analogue radio (FM) operates on a different spectrum band, FM transmitters are often installed on the transmission masts for DVB-T. The removal of such locations and mast would substantially limit access to FM by commercial radio operators, as fewer radio services distribution could afford increased fixed costs allocated to individual services.

Equipment and application used for radio broadcasting purposes depend on programme making and special events (PMSE), covering off-air events with real-time presentation of audiovisual information, which includes the transmission of audio, video and data signals. In that sense, it is paramount that the **reserved sub 700 MHz band benefits to broadcasters and their activities as a whole**, embracing PMSE as well as live audiovisual production and contribution.

AER therefore welcomes the RSPG's Opinion's mention at point 3.4. (Broadcasting and PMSE) outlining that *"the future of broadcasting and PMSE in regard of the UHF Band 470-694 MHz shall not be subject of a new RSPP"* as reserving the sub 700 MHz band to broadcasters. Furthermore, we are in favour of similar recommendations from the RSPG to the European Commission on an EU position to the upcoming WRC23 conference, that **would go beyond the 2030 limit** foreseen by article 4 of Decision (EU) 2017/899.

SUPPORT THE AUDIO REVOLUTION WITH A MULTI-PLATFORM FUTURE

As a small but growing proportion of radio listening is now online, the future of commercial radio is multi-standard and multiplatform. To remain accessible to all, radio must be present on all platforms and 5G broadcast represents an important distribution perspective for radio operators, bringing broadcast radio to mobile devices.

AER fully supports the European Commission's ambitious plans towards 5G, and Broadcaster are taking fully advantage of the audio revolution with 5G broadcast trials are underway in several European States¹ (e.g. Germany, Italy, Austria and the United Kingdom). Standards for 5G broadcast, in particular for commercial radio, would include the following points:

- Free-to-access at the point of use of radio, via all mobile devices to linear programmes;
- An efficient use of spectrum, especially in comparison to streaming;
- Supporting overall reduced energy consumption;
- Robust medium in times of crisis with strong and better coverage via high-power-high-tower distribution.

AER acknowledges that some European countries have decided, in cooperation with industry actors, to switch off radio transmission on a given technology in favour of another. **We firmly support any decision taken at national level, that is the result of a consensus with all radio providers, but caution against provoking a premature transition to new technologies and convergence of services.** To this end, AER agrees with the RSPG's assessment to *"strike a balance to the benefit of consumers/users in all Member States"*, while

¹ European 5G Observatory, [5G Trials publicly announced in EU27, UK, Norway, Russia, Switzerland and Turkey](#), March 2021.

“ensuring the EU population free access to linear broadcasting content over different platforms, where appropriate and based on national decisions”.

For more information, please contact the AER office in Brussels at aer@aereurope.org.