



RADIO SPECTRUM POLICY GROUP
-
DRAFT RSPG OPINION ON COMMON POLICY OBJECTIVES
FOR WRC-15
-
AER COMMENTS

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.

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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 would like to present the commercially funded radios' point of view on the Radio Spectrum Policy Group (RSPG) Draft Opinion on Common Policy Objectives for WRC-15 (RSPG Draft Opinion). This RSPG, with this Opinion, intends to assist the European Commission (EC) in proposing Common Policy Objectives in an EC Communication and offer guidance to Member States in developing European Common Proposals (ECPs) with the European Conference of Postal and Telecommunications Administrations (CEPT). In other words, this RSPG Draft Opinion's main aim is to advise the EC and EU Member States on potential coordination of policy approaches with regard to the particular radio spectrum policy issues addressed in the agenda for the next World Radiocommunication Conference (WRC) to be held from November 2nd to 27th, 2015. AER will comment on the points related to agenda items 1.1, 1.2 and 10.

Agenda items 1.1 + 1.2 – additional spectrum allocations to the mobile service on a primary basis, identification of additional frequency bands for International Mobile Telecommunications (IMT) and related regulatory provisions + use of frequency band 694-790MHz

The RSPG Draft Opinion recalls that agenda item 1.1 is the “result of proposals including from Europe demonstrating broad consensus on the need to harmonise additional spectrum for the mobile service to facilitate further development of mobile broadband applications in line with the objectives of the Radio Spectrum Policy Programme [...]. However preparatory discussions of potential frequency bands to meet the additional spectrum requirements have proved to be controversial and action at WRC-15 could impact a range of other EU policy areas [...]”. From this perspective, AER would like to recall that a potential reallocation of band 470-694MHz to other services than those currently using it, although not used by radio, could have indirect effects on radio: TV services may have to migrate to

other frequencies and could end up using frequencies planned for radio, especially digital broadcast radioⁱ.

The RSPG Draft Opinion recalls that agenda item 1.2 “follows the decision taken at WRC-12 to allocate the band 694-790MHz also to the mobile, [...] immediately after WRC-15 and to identify the band for IMT [...]. The purpose of the Agenda Item is to determine the technical and regulatory conditions applicable to this mobile allocation, including a possible refinement of the lower band edge”.

AER welcomes the recommendations set by the RSPG to

- **“support no mobile allocation in the band 470-694MHz”**
- **“support 694MHz as the lower edge for the allocation to the mobile service on a co-primary basis with the broadcasting service and identification for IMT in the 700MHz band, while ensuring protection of the broadcasting service below 694MHz”**
- **“ensure that no regulatory provisions in the radio regulations relevant to coexistence with broadcasting [...] in addition to GE-06 agreement is adopted”**

Besides, AER would like to recall, as mentioned in the RSPG Opinion on “Strategic challenges facing Europe in addressing the growing demand for wireless broadband”, that Band L’s usage was allocated to radio in the context of the ITU and of the CEPTⁱⁱ. At national level, and according to information received, it appears that some EU Member States were making use or were planning to make use of Band L for digital radio:

- In Czech Republic, Band L is used for digital radio broadcasting. Private and public radios hold 10 years licences running until 2020-2021ⁱⁱⁱ.
- In Italy, the National Regulatory Authority (AGCOM) adopted a regulation in November 2009, planning the development of digital radio broadcasting in both Band III and Band L^{iv}.
- In France, the National Regulatory Authority (CSA) delivered in 2013Q1 an authorisation for satellite radio services in Band L^v

AER would like to recall that, once Band L (1452-1495MHz) is allocated to IMT, **Band III (174-230MHz) will be the only band allowing digital broadcast development of radio, and cannot, under no circumstance, be devoted to other services.**

Agenda item 10 – items for inclusion in the agenda for the next WRC, and views on the preliminary agenda for the subsequent conference and on possible agenda items for future conferences

For future WRC agenda, it is essential to ensure radio’s continued health that current rules and allocation related to Bands II and III are maintained as they currently are. AER would thereby like to stress some important points regarding radio’s current and future development.

On-air broadcast radios reach massive audience on a daily basis in all EU Member States: approximately 80% 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 environments^{vi}
- their programmes encompass, broadly speaking, all possible formats, from debates to music-only^{vii}
- 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 public^{viii}

Radio is, and has been for the past 50 years at least, ubiquitous, mobile, simple-to-use, interactive and free-to-air. These features make it the most intimate medium and the most trusted medium^{ix}.

AER would then like to highlight that it is still unclear how transmission of radio via the Internet can efficiently replace radio broadcasting^x. Therefore, radios' activities do and will require use of spectrum, as a primary user.

This element is of utmost importance and entails that while terrestrial digital radio broadcasting most likely constitutes radio's future main means of transmission, it is very difficult today to say when or how. In other words, AER would like to recall that:

- no universal switch-off date for analogue radio broadcasting services should be envisaged at EU level and decisions on standards to be used for digital radio broadcasting should be left to the industry
- decision on whether to proceed and the appropriate time-frame to migrate from analogue to digital radio broadcast technology should be left to each national industry
- Further coordination at EU level of spectrum management of the bands used by radio does not seem necessary or appropriate
- access to bands II and III for radio broadcasting will remain necessary for a harmonious development of digital radio across Europe
- maintaining exceptions to market-based approaches to spectrum management in bands II and III is equally essential

AER continues to support a multi-platform future for radio. As well as analogue broadcast streams and digital broadcast signals the inclusion of other digital means of transmission in radio receivers, such as internet reception, will help to ensure a continuing healthy radio market in Europe. Multi-standard solutions – which would allow all devices to listen to radio throughout the continent – is a positive signal for future developments.

AER remains available to explain this position in further details.

ENDS

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ⁱ E.g., in Finland, TV services are currently using on a "temporary basis" Band III, planned for digital broadcast development

ⁱⁱ Please see for example page 19 of the RSPG Opinion on Strategic challenges facing Europe in addressing the growing demand for wireless broadband

ⁱⁱⁱ These programmes are currently broadcast by two multiplexes: one (operated by Teleko) broadcasting 15 programmes, the other one (operated by RTI) has started this year its operations and broadcasts one programme. Please see here (in Czech only): <http://www.ctu.cz/> (e.g. here: http://www.ctu.cz/cs/download/vestniky/rok_2011/tv_06_2011.pdf) and here (in English): <http://www.radiospektrum.cz/eng/a0020e.html>

^{iv} "Regolamento recante la nuova disciplina della fase di avvio delle trasmissioni radiofoniche terrestri in tecnica digitale / Delibera n. 664/09/CONS". It was indicated that all band L was necessary for digital radio, because the coordination of small band L assignments requires a lot of spectrum, especially in those countries which need to deal with propagation over warm water, like the Mediterranean Sea. Therefore, spectrum will be needed in order to be able to avoid self-interference at national level and harmful interference with neighbouring countries outside Italy. Please see here: <http://www.agcom.it/default.aspx?DocID=3591>

^v The CSA ran a call for tenders for the use of Band L by radio at the end of 2011 (closed on December 28th, 2011) and published on November 7th, 2012, its decision to award a licence to "Onde Numérique", an operator delivering 64 radios online, and on-air via satellite complemented by terrestrial broadcasting on Band L. On January 15th, 2013 (published on January 26th at the official journal), the CSA has delivered an authorisation to

broadcast programmes as from January 1st, 2014. Onde Numérique will have until 2020 to cover 60% of the French territory. The authorisation details that this project should use spectrum between 1452 and 1479,5 MHz. Please see here: <http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000026980512>

^{vi} 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

^{vii} To give just examples, please see:

- the French AER Member, SIRTl : <http://www.sirti.info/adherents/>
- the UK AER Member, RadioCentre: <http://www.radiocentre.org/membership/stations>

^{viii} For example: When the UK was brought to a stand-still as heavy snowfall caused widespread disruption across Britain in early 2013, stations were staffed around the clock to bring listeners the latest information on school closures and transport issues. Jack FM Oxfordshire and Capital South Wales were just some of many stations who extended their breakfast shows to take listener calls and share closure information. For more information, please see here (.pdf pages 15 / actual 12 and following): http://radiocentre.org/files/action_stations_web.pdf

^{ix} Please see Standard Eurobarometer 80 from November 2013 on "media use in the European Union": http://ec.europa.eu/public_opinion/archives/eb/eb80/eb80_media_en.pdf

^x A study done by Teracom at the end of 2013 in Sweden shows that online radio cannot realistically replace broadcast radio, due to the necessary high costs and infrastructure developments: <http://www.mynewsdesk.com/se/teracom/documents/teracom-white-paper-31336>