

## **SUBMISSION TO THE RADIO SPECTRUM POLICY GROUP OPINION ON THE INTRODUCTION OF MULTIMEDIA SERVICES IN PARTICULAR IN THE FREQUENCY BANDS ALLOCATED TO THE BROADCASTING SERVICES**

**RSPG Draft – May 11, 2006**

The Association of European Radios (AER) is a Europe-wide trade-body of private and commercial radio broadcasters in France, Germany, Italy, the UK, Greece, Spain, the Netherlands, Denmark, Finland, Sweden, Switzerland and Romania. As such, AER represents the interests of over 4.500 radio operators broadcasting to millions of listeners across Europe every day.

Although in their vast majority, radio services are being broadcast using FM and AM analogue frequencies, digital radio services are increasingly being launched in the European Union by using the Eureka 147 family of technologies. Radio broadcasters are also actively testing other systems such as DRM, DVB-H, HD Radio, etc. Most of these technologies provide CD-like quality, interference-free sound, current as well as additional radio services such as data, text, interactive services and, increasingly, multi-media facilities. These technologies however have different and sometimes conflicting needs with regard to spectrum as well as regulatory arrangements.

In spite of some encouraging signs in some markets, many roadblocks are still slowing down the development of digital radio in the EU, most of which are appropriately outlined in the interim draft report on “*Interactive Content and Convergence – Implications for the Information Society*” commissioned by the European Commission at the beginning of this year.<sup>1</sup>

**Beyond the regulatory, economic, technological and indeed competition considerations, the most crucial roadblock for private and commercial radio broadcasters concerns access to spectrum for digital radio broadcasting.**

AER therefore welcomes the opportunity offered by the RSGP to express its views on the introduction of multimedia services in the frequency bands allocated to broadcasting services.

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<sup>1</sup> The preliminary results were presented during a work-shop in Brussels on July 3rd, with a final report due in September 2006.

### Band III (174-230 MHz)

Following the results of the RRC-06 Radio Conference in Geneva last May, Band III, already in use in some European countries, will become more fully available by 2015 for T-DAB services in accordance with the GE06 Agreement. The GE06 plan is based on 7 MHz raster and is planned in Europe for at least indoor portable reception. The plan opens up opportunities for a structured introduction of T-DAB services in all of Europe and other ITU Region 1 countries.

The mask concept as it is expressed in the GE06 Agreement and in the declarations to that Agreement makes it possible for flexible use by services other than T-DAB and DVB-T. Even the possibility to use DVB-T entries in the plan to achieve 4 T-DAB services is foreseen.

AER would therefore requests that the outcome of the RRC-06 Radio Conference be respected and that this band be used primarily for the introduction and development of services using the proven Eureka 147 family of standards.

**AER firmly requests that this frequency band not be allocated to services other than broadcasting.**

### L-band (1452-1492)

AER disagrees with the position taken by RSPG with regard to the L-Band and requests that the results of the CEPT Maastricht Conference (MA02) for this band be respected. Indeed the spectrum between 1452 and 1479.5 MHz is regulated by the MA02 agreement for T-DAB broadcasting and the spectrum between 1479.5 and 1492 MHz is regulated by the ECC/DEC(03)02 decision<sup>2</sup> for S-DAB broadcasting.

L-band spectrum is therefore already available to broadcast services using the Eureka 147 platform. Although this band is only sparsely used for T-DAB services today, it will become increasingly important for future broadcast multimedia developments, using for example, DMB (part of the Eureka 147 family of standards). The future use of L-band for multimedia services must include the use of the proven and European Eureka 147 family of standards. The MA02 plan allows flexible deployment of multimedia services base on standards using the Eureka 147 family and there is no need to revise this agreement at the present date. In any case the current channel raster shall be maintained in order to allow a better coordination at European level with services already implemented.

**AER also firmly requests that this band not be used for other services than broadcasting.**

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<sup>2</sup> ECC Decision of 17 October 2003 on the designation of the frequency band 1479.5 – 1492 MHz for use by Satellite Digital Audio Broadcasting systems

### Action at EU level

AER would like to remind RSPG that private and commercial radio broadcasting is a highly regulated industry at national level and solutions will thus need to be provided primarily at that level. However, from a European point of view, while highly popular with its audiences, private and commercial radio is nevertheless a small and medium-sized industry ('SME industry') and may thus need particular attention.

The EU can help and AER would like to stress some of the points already made in previous submissions:

- Availability of spectrum should be guaranteed for digital radio broadcasting in a highly competitive environment where spectrum could become a commodity like any other and for which private and commercial radio broadcasters – mostly SMEs - will not be able to compete against other users such as telecom operators.
- No switch-over date for radio broadcasting should be set but AER insists that radio broadcasters should be provided fair access to spectrum for digital broadcasting when the right conditions are met.
- The European Union can help by ensuring that a balance between public and private radio broadcasters is struck in terms of spectrum allocation for digital radio licenses.
- The European Union can help by encouraging balanced EU and national policies to ensure that the concerns and needs of private and commercial radio broadcasters – being different from those of television or telecommunications and at times of public service broadcasters - are handled appropriately and in a balanced way also with regard to multimedia service provision.
- And more generally the European Union can help by ensuring that the “radio medium” in general and free-to-air radio in particular occupies the place it deserves in its spectrum and Information Society policies.

ENDS  
12/07/2006

### NOTES:

1. Brussels-based AER (the Association of European Radios) represents the interests of 13 national private and commercial radio associations in 10 EU Member States, Switzerland and Romania. The combined membership is of over 4,500 private/commercial radio stations broadcasting to millions of daily listeners across Europe. The AER web site provides further information on membership [www.aereurope.org](http://www.aereurope.org)
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