

WorldDAB 426
WorldDAB SB/585
WorldDAB EAC/316
WorldDAB RSC/209

PUBLIC CONSULTATION
in the context of the development of a RSPG Opinion on the
spectrum implications of switchover to digital broadcasting

A submission to the European Commission

by

WorldDAB,
the Forum for Digital Audio Broadcasting

Brussels, 12 March 2004

The WorldDAB Forum welcomes the opportunity to participate in this consultation, and to state the reasons why DAB digital radio is so important to European citizens and why it must be given high priority in future spectrum planning.

DAB technology confers on radio a vital role in the digital economy and the information society because transmissions will provide low cost, widespread access to data wherever the user may be.

The World DAB Forum is an international, non-governmental organisation whose role is to promote the awareness, adoption and implementation of DAB Digital Radio worldwide. Its members include public and commercial broadcasters, receiver manufacturers and other companies and bodies committed to converting the technology behind DAB Digital Radio – the Eureka 147 system – into a commercial marketing success, to the lasting economic and social benefit of all concerned.

Contact:

Rebecca Dorta
Project Director

World DAB Forum
7 Swallow Place
London W1B 2AG
Tel. +44 207 288 4640/41/42
Fax. +44 207 288 4643
www.worlddab.org

Responses to the questions posed in the consultation

(1) How can co-ordination between Member States on spectrum management, at bilateral and EU level, contribute to a quick and efficient switchover from analogue to digital?

European citizens will benefit most from coordination of switchover because a clear switchover plan will increase consumers' trust in the technology and confidence in investing in future-proof digital receiving equipment. It will also create a larger, EU wide market for receiver manufacturers and consequent greater choice and lower equipment costs for consumers. To produce mass volumes, manufacturers require a unified, strong message that Governments are serious about their switchover strategy, in both television and radio. Co-ordination at European level could take the form of a recommendation to Member States to give clear indications regarding their switchover plans. Consideration should be given to an EU recommendation of benchmark practice in time and technology, with a view to allowing a more complete transition to a final technical plan, and thus more efficient use of the available spectrum.

(2) In particular, what would be the added value from EU co-ordination ahead of the Regional Radio Conference starting in 2004 and other international negotiations?

EU coordination of aspects of the 'requirements' for the new spectrum plan could make a major difference. In particular, if the EU builds consensus that high priority should be given to allocating adequate spectrum to ensure the future of terrestrially transmitted digital radio (T-DAB), this would give help and guidance to the spectrum planning activities of the CEPT. The role of the EU should be to build and explain as a matter of general policy the Community view on the main planning targets, and these should include radio as a high priority.

Digital radio has a key role in media convergence. As the result of digitisation radio becomes a far more interactive and rich experience, mixing audio with other data such as text and video. Digital radio operates on a variety of platforms (terrestrial and satellite DTV, digital radio, digital telephony and the internet) in both fixed and mobile environments. It does this at low cost and spectrum efficiently, for the universal benefit of users.

(3) Are greater transparency and technological neutrality of spectrum assignment, notably through valuation and market tools, instrumental to switchover?

For the broadcast bands, valuation and market tools may be counterproductive for switchover. Selling spectrum (rather than charging administrative costs) will discourage, not encourage broadcasters to move from analogue to digital broadcasting, or to start new digital services from scratch. Experience shows that broadcasters and listeners need significant incentives to move from analogue to digital. For example, broadcasters respond to extended licence periods while listeners relish additional news services. Spectrum pricing and selling would not aid this. Furthermore, fair prices for services which have significant start up costs, and for which inexpensive substitutes (analogue radio) are available, will be difficult to establish. We think it would be counter-productive to penalize with spectrum charges the cultural and democratic dividend which is intrinsic in switchover to digital, free-to-air broadcasting.

(4) What will be the “spectrum dividend” from switch-off, and how should this be allocated to specific services?

In radio, the "spectrum dividend" from switch-off will be measured in terms of cultural and democratic benefits and will be felt by the listener in new and better digital radio and other data services. There will be a wider choice of stations but also added value multimedia such as extensive traffic and travel information (with its valuable implications for the improvement of road safety) and access to internet pages to consumers no matter where they may be. Importantly, WorldDAB sees these services as being not only robust and attractive but also free to air. Providing such services on a one-to-many rather than a one-to-one platform would be cheaper both in terms of provision and reception. The free-to-air nature of the medium and the comparatively low cost of service provision and transmission does much, we believe, to overcome the danger of dividing European society into the information rich and the information poor.

The benefits for radio from digital switchover should be recognised and taken into account at the RRC 04/05, when a plan for digital broadcasting will be adopted. The best way to make this plan future-proof would be to adopt the provision proposed in European Common Proposal 5 (EUR/7A5/2) to the Conference, to allow any terrestrial system provided that such use neither causes greater interference nor demands higher protection than the system indicated in the Plan entry.

(5) Does convergence require more flexible allocation mechanisms than traditional ones, which tightly link frequency bands and individual communication services according to ex ante decisions?

The notions of 'convergence' and 'more flexible allocation mechanisms' given in the question are undefined and open to wide interpretation. Nevertheless, it is useful to emphasise that digital radio broadcasting needs known frequency channels which do not change. Dynamic allocation of frequency channels is unsuitable for broadcasting because it would be confusing for listeners and make the medium more difficult to access.

Furthermore, it is certainly the case that radio needs a fair place on digital multiplexes. Radio operators should be encouraged to participate in digital developments by multiplex ownership as well as the provision of digital radio programmes and other data services. Whatever multiplex licensing systems member states adopt, sufficient space should be found for the provision of digital radio services that include both digital versions of current analogue services and new digital-only services.

WorldDAB March 2004