

Draft RSPG 2010 Work Programme VPRT's comments

The Association of Commercial Broadcasters and Audiovisual Services in Germany, VPRT, represents the interests of approximately 160 commercial broadcasters as well as companies offering Telemedia services in Germany. About 70 members out of the 160 are active in the radio service and audio sector.

VPRT welcomes the opportunity to comment on the Draft RSPG 2010 Work Programme. We especially want to give our views on the spectrum usage situation by radio broadcasting services, which are mentioned as one work stream in the section "technology impact on spectrum management" (page 4 f.).

The future development in the different Frequency bands (especially Band II) is of utmost importance to our radio service members. Therefore we are seriously concerned about the fact that RSPG is considering a target date for analogue radio broadcasting (FM) switch off.

Nevertheless, we see the need to think about future developments and possible usages of Band II which comply with the provisions of the GE84 agreement and ensure FM services which are able to operate free of any interference. At the same time we would like to stress the necessity of adapting and developing those GE84 provisions to ensure the continuity of the Frequency modulation (FM) and the future usages in Band II. However, this needs to be achieved without further coordination at international level.

1. Band II with FM is and will continue to be the most important means of transmission for radio

Band II with FM is the most important means of transmission for VPRT's radio service members. Also in the foreseeable future, Band II with FM will remain the basis of commercial activities for private radio stations. This is grounded by two reasons: firstly, the heavy usage by listeners and secondly, the very high market penetration of FM receivers. Currently, more and more new Band II-FM-receivers are establishing in the market. As a consequence the receiver basis is modernised constantly. Modern communication devices such as mobile phones, smart phones and media players integrate Band II-FM receivers and ensure an even wider availability of FM. Switching off FM transmission is therefore neither realistic nor can it be crowned with success.

2. FM in Band II is of utmost importance in the case of catastrophe

Due to the extremely high penetration of FM-devices in Europe and its heavy usage, Band II is the only reliable way to inform the public in the case of catastrophe or need of contacting citizens in an emergency. This was recently proved, when a blizzard hit Germany at the beginning of January. This is also valid in case of a regional power cut as many devices are powered by batteries¹. For the time being, no digital receiver (DAB etc.) has been developed for the operation with battery

3. Band II is a small but efficiently used frequency range

The so called Band II is the frequency range between 87,5-108 MHz and only represents 20,5 MHz. Nearly every single frequency is used in this bandwidth. Together with the broad receiver penetration and very high usage by the listeners this small bandwidth is very efficiently used. In the last few years receivers have been significantly developed which today results in an enormous improvement of their reception quality. Millions of listeners are convinced by the characteristics of FM. Even under very difficult circumstances for receiving a signal a very good reception is possible. On the other hand, other (digital) systems are disconnected in a very early stage, which is rather disadvantageous. The usage of Band II is still "state of the art".

4. No migration or partial migration of the services in other frequency spectrum

VPRT rejects any proposals which include the shifting of the current usage from Band II to other frequencies. This would bring the intensive and effective use of Band II to an end. Due to the lack of digital receivers as well as of the absence of consumer demand for change and migration, a restart of a digital system would mean inefficiency and un-sustainability for a very long period of time. In other bands there is enough space to introduce new systems. Band III (174-230 MHz - channels 5-12) and therewith corresponds to 56 MHz – is available.

5. Consideration of future developments of FM transmission after GE84

Since the Geneva conference of 1984 (GE84) different parameters of the FM-usage in Band II have changed. In the meanwhile different and changed sources of signals are available (Music), the signal processing was adapted and a compression of the signals was introduced. The processing of the FM-signals in the receivers is completely digital. 25 years after G84 the provision from the Geneva plan should be adapted and developed according to recent technical developments.

¹ <http://news.bbc.co.uk/2/hi/8448095.stm>; <http://www.spiegel.de/panorama/0,1518,670896,00.html>

6. There is a chance for new standards with unlimited parallel FM operation

In the medium term there are different options to develop the use of Band II. The use of FM has to remain due to the heavy use described in point 1.-4. An unlimited parallel FM operation offers the opportunity of financing additional engagements from the remaining FM transmission. Further developments with new standards based on an additional unlimited parallel operation of FM is a chance for economical efficiency. Therefore it is necessary to adapt the ETSI spectrum mask ITU-BS.412-9 as well as other ITU-R recommendations by keeping the guidelines for aeronautical services (VOR and ILS). In this way the “envelope concept” - which was already used in the GE06 plan – could be kept. Therewith new standards under an adapted ETSI spectrum mask would be possible without interfering with the existing FM transmission and conditions. In this case a new planning conference would not be necessary.

We support a conversion to digital assignments if the FM transmission can be maintained without any limitation. In this case a switch from single FM transmission into a digital transmission would be possible, without discriminating other FM transmissions.

We do not see a future for technologies which are linked to a switch-off of the FM transmission.

7. Interference with FM through new standards have to be avoided

As already mentioned in point 6, it must be avoided that future technology developments cause any interference to the existing FM transmissions. A reduction of the current coverage caused by future developments is not acceptable for VPRT members. Some aspects of the technical developments are promising but due to a lack of information a full evaluation is not possible.

8. No international re-planning of Band II or of parts of it

Due to the very intensive and effective use of Band II we do not see any need for a long and very costly international re-planning. The GE84 plan should be supported in its principles and adapted as mentioned in point 6. Even a re-planning of certain parts of the Band II would not lead to any benefit, as the complete Band II is used and needed in the future.

9. Re-Adjustment of Band II at national level is necessary

However, we always have been calling for a re-adjustment of Band II at national level in order to balance the relation between public broadcasters and private broadcasters. At the moment we face an unbalance, with regard to the amount of

frequencies as well as the frequency capacity, held by public broadcasters on the one hand and by private broadcasters on the other hand. We therefore ask for a re-adjustment which takes the actual demands into account. The introduction of new standards would carry forward the current unbalance.

10. Further research and economical comparison are necessary

Next to the research and comparison, with respect to the technical characteristics and parameters of the available standards, further research is needed to complete a substantial evaluation. For the time being, an evaluation of the economical and financial factors is still missing. We therefore ask to also take those aspects into consideration.

Summary of VPRT comments

- Band II with FM is and will continue to be the most important means of transmission for radio
- FM in Band II is of utmost importance in the case of catastrophe
- Band II is a small but efficiently used frequency range
- No migration or partial migration of the services in other frequency spectrum
- Consideration of future developments of FM transmission after GE84
- There is a chance for new standards with unlimited parallel FM operation
- Interference with FM through new standards have to be avoided
- No international re-planning of Band II or of parts of it
- Re-Adjustment of Band II at national level is necessary
- Further research and economical comparison are necessary

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