

**Proposed PB comments on the consultation issues raised by TRAI in its
Consultation Paper (CP) on “Issues related to Digital Radio
Broadcasting In India” dated 10th July 2017**

Consultation Issue 5.1:

Is there a need to encourage or facilitate introduction of digital radio transmission at present? If so, what measures do you suggest and in which market?

Proposed Comments:

Digital Radio Transmission needs to be introduced and encouraged in India. Measures that can be taken could be:

- There should be national digital radio mission to support digital radio broadcasting in India and, to achieve this, a digital radio innovation fund should be created to:
 - develop indigenous digital radio standards
 - develop receiver chip sets
 - encourage support to start ups in the digital radio field
- mandate Mobile manufacturers and car infotainment manufacturers to integrate digital radio reception facility in their products
- Allow Private players in the digital radio sector so that diverse content is offered to the consumers. This will facilitate better marketing of digital radio platform and ensure better availability of affordable radio receivers in the market

We should encourage innovative and flexible business models wherein the cost of receivers is subsidised for the consumer e.g. car manufacturers bundling radio broadcast services free of cost for initial period of say one year or so.

Consultation Issue 5.2:

Is there a need to frame a roadmap for migration to digital radio broadcasting for private FM broadcasters? If yes, which approach, mentioned in para 4.7, should be adopted? Please give your suggestions with justification.

Proposed Comments:

Yes, there a need to frame a roadmap for migration to digital radio broadcasting for private FM broadcasters. Out of the given three options

in Para 4.7, Prasar Bharati would prefer a 'Managed Introduction' approach as in the form of FM radio, as on date, consumers have a popular choice available with them at a reasonable and affordable price. Except for metro and major cities, capacity is still available for expansion of FM channels.

Therefore, full migration of analogue service into digital need not be envisaged at this stage. However, there should be a long term objective to ensure migration of all analogue radio services to digital.

Consultation Issue 5.3:

Should the date for digital switch over for radio broadcasting in India need to be declared? If yes, please suggest the date with suitable justification. If no, please give reason to support your view.

Proposed Comments:

- Digitalisation approach should be adopted in a phased manner.
- Conversion of FM transmitters of Metro cities can be taken up in first phase.
- With the uptake of the digital radio services, the Analogue-Switch-Off (ASO) date may be prescribed and linked with availability of affordable receivers in the markets.

Consultation Issue 5.4:

Is present licensing framework or regulatory framework is restrictive for migration to digital radio broadcasting? Please explain with justification.

Proposed Comments:

There is a need for an enabling regulatory regime as, at present, there is no specific regulatory framework for migration to digital radio broadcasting in India. The policy framework should be non-restrictive and simple, aligned with Digital India Mission.

Consultation Issue 5.5:

Should single digital radio technology be adopted for entire country or choice of technology should be left to radio broadcasters? Support your reply with justifications.

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Consultation Issue 5.6:

In case a single digital radio broadcast technology is to be adopted for the entire country, which technology should be adopted for private FM radio broadcasting? Please give your suggestions with detailed justification.

Proposed Comments:

- Single Digital technology should be adopted as most of the major international markets have adopted a single digital radio technology. Some of the examples are HD Radio in US and North America, ISDBT-tsb in Japan, DAB/DAB+ in Austria, Germany etc.
- Adoption of single technology enables economy of scales and facilitates faster development of ecosystem including rich bouquet of services and availability of affordable receivers.
- While selecting a standard/technology, a comparison of the Number of Channels per Transmitter and the Operating Costs for the Broadcasters is to be analysed and the appropriate technology providing 'Maximum Channels per Transmitters with Minimum Operating Cost' is to be preferred. The cost of initial investments and the requirement of multiple equipment installations are also important criteria. In this context the possibility of up to 16 Radio Channels per DAB+ Transmitter and up to 44 Radio Channels per DVB-T2 Transmitter also should not be ignored.
- However, while adopting a particular technology standard, its suitability for Indian conditions needs to be ensured.
- We must have a framework which facilitates evaluation of emerging technologies by providing suitable platform for demonstrations, field trials etc. for ensuring smooth rollout of new services like digital radio with responsibility casted upon the OEMs for ensuring desired performance parameters.
- Preference should be given to indigenous innovators/ integrators/ manufacturers, thereby promoting objectives of 'Make in India', 'Start-up India' and 'Digital India'.

Consultation Issue 5.7:

How issues of interference and allocation of appropriate spectrum allocation can be settled in case the option to choose technology is left to radio broadcasters?

Proposed Comments:

This issue will not arise if Single Digital technology is adopted for all radio broadcasters.

Consultation Issue 5.8:

Should the permission for operating FM channel be delinked from technology used for radio broadcasting? If yes, please provide a detailed framework with justification.

Proposed Comments:

Digital Radio Broadcasting in FM band need to have only one technology to have viable receiver ecosystem. The permission for operating FM channel should be linked with the technology used for radio broadcasting. In the FM Band, AIR is in the process of examining the digital technology to be adopted. It would be advisable that a single digital radio broadcast technology is adopted for the entire country in FM Band.

Consultation Issue 5.9:

Should the existing operational FM radio channels be permitted to migrate to digital broadcasting within assigned radio frequency? If yes, should there be any additional charges as number of available channels in digital broadcasting will increase? Please provide a detailed framework for migration with justification.

Proposed Comments:

No comments.

Consultation Issue 5.10:

Should the future auction of remaining FM channels of Phase-III be done delinking it from technology adopted for radio broadcasting? Please give your suggestions with detailed justification.

Proposed Comments:

No, it should not be delinked from technology adopted for radio broadcasting.

Consultation Issue 5.11:

In case future auction of remaining FM channels of Phase-III is done delinking it from technology, should the present auction process be continued? If no, what should be the alternate auction process? Please give your suggestions with detailed justification.

Proposed Comments:

Not applicable, in view of response to the Consultation Issue 5.10.

Consultation Issue 5.12:

What modifications need to be done in FM radio policy to use allocated FM radio channels in technology neutral manner for Radio broadcasting?

Proposed Comments:

As explained against Consultation Issue 5.8, instead of technology neutral approach, only one technology should be adopted that suits to Indian conditions and promotes 'Make in India' and 'Digital India' initiatives of the Government.

Consultation Issue 5.13:

What measures should be taken to reduce the prices of digital radio receivers and develop ecosystem for migration to digital radio broadcasting?

Proposed Comments:

Measures should be taken to leverage the economy of scales which may include the following:

- Open up digital radio to private players for catering to greater consumer demand for diverse content
- Make digital radio part of all flagship programmes of the Government so that all the benefits available to such programmes such as tax holidays for 3 years etc. are extended to digital radio
- To spur innovation and adoption, culture of innovation should be nurtured in content/ receiver / smart devices
- Convergence of devices - consumer need not bother whether the content is obtained from internet or through broadcasting
- Technologies developed are tuned to Indian conditions
- Collaboration with ISRO/Antrix should be made for exploring the possibility of satellite based digital radio services

- Collaboration with IITs and IISc should be made in the process of developing digital radio standards, device development etc.

Consultation Issue 5.14:

Stakeholders may also provide their comments on any other issue relevant to the present consultation.

Proposed Comments:

Affordable digital receiver is the key for success of digital radio broadcasting, along with diverse and differentiated content.

For the sustainable broadcast/communication framework for supporting all emerging digital technologies and the services and businesses supported by them, the National Broadcast/Communication Backbones must step in to provide strong foundation. It is essential to ensure that these national broadcast/communication backbones are supported with adequate funding.
