Mr. VK Agarwal Telecom Regulatory Authority of India Mahanagar Doorsanchar Bhawan Jawahar Lal Nehru Marg New Delhi-110002 India

Subject: Consultation Paper No.: 17/2019 on Reserve Price for auction of FM Radio channels

13 November 2019

Dear Sir.

We are grateful for the opportunity to provide consultation specifically regarding the implementation of digital radio. Broadcast Electronics and the Elenos Group of Companies are proud to have supplied a significant quantity of broadcast transmitters in India for both private and public sectors. Broadcast Electronics is also a leading supplier of digital radio technology spanning multiple digital standards.

2019 marks the 60th birthday for Broadcast Electronics, and we remain convinced about the critical role the over-the-air radio broadcast industry plays in the world, and the importance that radio be allowed to evolve and take advantage of the efficiencies and key features that digital radio offers. Thus we applaud the open fashion that the Consultation Paper proposes to enable broadcasters to choose the most appropriate technology for the Indian FM market.

Specifically, digital radio can offer dramatic improvements in spectral occupancy which provide multiple content channels using no more bandwidth than a conventional FM channel, and delivering more diverse programming to the Indian public. Further, digital radio, once implemented delivers a nationwide emergency alert network that can provide critical warning to the population in the case of natural disaster such as hurricanes or tsunami.

Of course, the receivers for digital radio must be in place for these benefits to be useful, so it is important that the digital radio systems provide for effective simulcast operation of both the analogue FM signal as well as the new digital signal on the same transmitter, in the same channel. This way, a natural transition can be accomplished with no loss of listenership.

We would like to express our hope that existing FM broadcasters will also be granted the opportunity to embrace digital radio as well, not just the new Phase III licensees, which will surely improve the time to effective digital radio implementation in India.

Respectfully Submitted,

Charles W. Kelly, Jr. ckelly@elenosgroup.com Vice President of Market Development The Elenos Group of Companies





