



November 12, 2019

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

Dear Sirs,

Xperi Corporation applauds Telecom Regulatory Authority of India on publishing the Consultancy Paper for the Phase III Auction for private broadcasting and expanding radio broadcast opportunities within India. Your comments regarding the consideration of digital radio transition are progressive and look toward the future vision for radio broadcasting.

Xperi Corporation is extremely supportive of the consideration for digital radio in this new auction. It is important to permit radio stations to take full advantage of the benefits of digital broadcasting to enhance the services. Our HD Radio technology offers many advantages for spectrum efficiency, new content services, and reliable emergency warning systems.

By not selecting a specific digital radio system the industry can decide a solution which meets market and industry needs. By allowing for multiple audio channels, radio stations will be allowed to increase services to the public. Access to additional radio programming has been demonstrated to maintain listenership and increase revenues for radio stations which have adopted digital broadcast services.

Most importantly, digital radio technology—through the HD Radio system—can enable improvements in public notification and emergency alert services and should be utilized as an integral part of the collaborative effort to upgrade the nation's public alerting capabilities. With digital radio technology, government authorities can greatly improve the nature and quality of their critical efforts to notify the public of national security alerts, weather-related events and other emergency situations. Radio broadcasters can utilize the audio and data channels of their HD Radio signal to send various enhanced alert information, including text notifications, image data and location information, and multilingual announcements.

Allowing for the application of digital broadcasting services in addition to analog will provide a smooth transition to digital broadcasting. Listeners will continue listening to the analog broadcast on existing radio receivers while new radio receivers will receive both analog and digital services. This hybrid broadcast transition plan has been successful for HD Radio adoption





by FCC in U.S., IFT in Mexico, CRTC in Canada, and KBP in Philippines. Our experience with digital radio implementations has demonstrated that a voluntary transition allows broadcasters to select the technology solution which benefits their business operations.

Xperi Corporation asks that TRAI consider additional guidance for existing radio stations operating with current licenses and provide a plan for a transition to digital radio operations while maintaining their existing analog channel assignments.

We look forward to the future of radio broadcasting in India.

Sincerely,

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