

CMFE

COMMUNITY MEDIA FORUM EUROPE

To: ECO
Mr Fatih Yurdal
Nansensgade 19-3
1366 Copenhagen
Denmark

Subject: Draft ECC Report 141, Future possibilities for the digitalisation of Band II

Nijmegen, 29 December 2009

Dear Mr Yurdal,

The Community Media Forum Europe (CMFE), is a gathering of policy experts, non-governmental organizations and national community media federations which, since 2004, supports the participation of the Community Media sector in policy debate and decision making at the European and national level. At present, the CMFE has 48 members from 20 different European countries, from which 15 are community radio and/or TV federations. CMFE works closely together with AMARC-Europe, the European branch of the World Association of Community Radiobroadcasters.

We welcome the opportunity to be able to comment on the Draft ECC Report 141 on "Future possibilities for the digitalisation of Band II" as published 29 October 2009.

Next to the more established public and commercial radio sector, community radio is a relatively new 'third' media sector. They operate on a not-for-profit base, often serving small geographical areas (local communities) and can be characterized as media 'from' and 'for' their communities. Regarding the requirements concerning their transmission platforms, the key elements are:

- *Coverage: Community radio stations have coverage requirements that can be quite different from those of other broadcasters operating in the same area. Such differences may not only be in terms of scale, but also in terms of the specifics of the geographical locations to be served.*
- *Universality: Community radio stations, just like their PSB and commercial counterparts, require transmission infrastructure which reaches as much of their target listenership as possible. Broadcasters therefore look towards technologies, which are used by as close to 100% of the population as possible.*
- *Cost: Although all broadcasters might complain about the state of their finances, budgets are typically particularly tight for community broadcasters that tend to depend heavily on volunteer support and unpredictable income streams. As a result, capital and recurrent (operational) costs are of particular concern to such broadcasters. For the end-user (listener), receiver cost has an impact on the rate of uptake and thus on speed at which a technology moves towards universality (see below).*

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- *Ease of maintenance: On a practical note, primarily for reasons of cost, community radio stations often bring as much as possible of their operational maintenance 'in house'. Their ability to do this is of course dependent upon the complexity of the transmission system used.*
- *Complexity: Community broadcasters require transmission infrastructure that is simple and well understood. The more complex the equipment, the more expensive it is likely to be as a result. Operational and maintenance costs are also proportionally related to complexity and technological maturity.*
- *Independence: Again, often for reasons of cost, but, in some jurisdictions, also sometimes for political reasons and concerns over editorial independence, community broadcasters will typically seek to own and operate their transmission infrastructure independently.*
- *Stability: Like other businesses, community radio stations make investments for the long-term. They are therefore looking to invest in transmission systems with a predictable life span.*

Concerning CMFE, its users, the audience and the radio stations should handle digitalisation of the FM-band very carefully since the FM-technology is a very mature system that is highly appreciated. It is a simple and flexible system and very cost effective. FM-receivers are cheap, compact and widespread: every household has several receivers. CMFE recognises also that the amount of frequencies, available within the existing FM-band, is not enough to fulfil the need of all aspirant radio organizations. Community radios often lack proper access to FM. On the one hand because all frequencies are already used by (and technically planned for) public and/or commercial radios, but on the other hand also often by the lack of proper legal recognition and the lack of urgency to provide adequate frequencies and to use proper planning mechanism to meet the needs of (often small scale) FM-frequencies for community radios.

Digital sound broadcasting can contribute to solve this kind of problems. It is necessary then, that this new systems build on the advantages of existing FM technique and that a smooth transition is provided. The existing analogue FM cannot be switched off before the new digital system is fully accepted by audiences. This process therefore needs a transition period in where both analogue and digital broadcasting of existing radios is possible.

We think that out of the described candidates for digitalisation of the FM and, DRM+, HD Radio, FMeXtra and T-DAB, DRM+ most closely meets the demands of our sector. Successful trials were held in Hannover (2007) and Paris (2009). DRM+ seems to provide for a smooth transition period (in-band capacity for digital sound) a spectrum frequency advantages. Next to that the technique seems to also be relatively simple and cheap to implement and allows stations to keep their own transmitter sites and frequencies.

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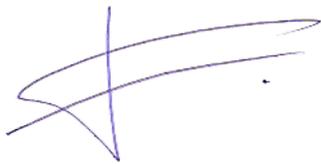
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HD-Radio seems to require complete replanning of European FM band because of guard-band requirements. FMeXtra has, until now, little international support and, in field test, multi-path problems. T-DAB requires complex multiplex structures that are not only relatively costly, but also makes community radios dependent on the multiplex owners.

We want to conclude with the notion that new technologies are meant to make more possible. This also applies to the digitalization of the FM-band: both audiences and radio organizations should profit from this. Also new technology should serve media policy and provide social gain instead of dictating media policy and only providing commercial gain.

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a vertical line, appearing to be the name Pieter de Wit.

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