



## Comments of the Digital Radio Mondiale (DRM) Consortium on the TRAI's Consultation Paper No, 17/2019 dated 16<sup>th</sup> Oct 2019 on 'Reserve Price for auction of FM Radio channels'

With reference to Consultation Paper No. 17/2019 dated 16<sup>th</sup> Oct 2019 from the Telecom Regulatory Authority of India (TRAI), inviting comments on the 'Reserve Price for auction of FM Radio channels', I, Yogendra Pal, Honorary Chairman of the India Chapter of the Digital Radio Mondiale (DRM) Consortium, is pleased to submit the following comments on Q7 and Q8 raised in the paper:

### **Q 7. Should the 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.**

#### **Comments of the DRM Consortium:**

As already recommended by TRAI in its recommendations dated 1st Feb 2018, the auction of remaining channels of Phase-III should be done by delinking them from technology. Broadcasters should be permitted to use any technology (analog or digital or both) for radio broadcasting in the frequency band allocated to them, specifying the digital standard to be adopted. The following justification is furnished in support:

- i. Due to inherent advantages of digital broadcasting, broadcasters world over are adopting high quality digital delivery systems, with TV leading the way. Mandatory digitisation of cable TV network in India is the example. Digitisation of the terrestrial radio broadcasting is also inevitable.
- ii. Analogue FM gives reasonable good quality of audio service but it is a century old technology which is not only spectrum and power hungry but also provides only one service per frequency. Digital broadcasting in FM band enables to provide multiple services, within the same allocated frequency band, at much reduced power along with host of value added services.
- iii. Digital technology offers win win situation to all stakeholders. By going digital, the broadcasters are in a position to offer more content choice, complemented with multimedia content, to their listeners at much reduced power consumption, thereby increased opportunity for revenue generation and meeting the aspirations of a large number of their audiences. Governments is immensely benefitted as digital technology is green technology, in getting extra income from the increased revenue generated by the broadcasters and also in using radio network for providing Emergency Warning alert signals. Listeners get excellent quality sound in stereo along with pictures and text in multiple languages.
- iv. All India Radio (AIR) has already taken a big initiative in this direction and it is learnt that Ministry of Information and Broadcasting is also working to permit digital broadcasting by private broadcasters and Community Radio Stations. The licences to be granted to the broadcasters would be valid for a long duration of 15 years. Keeping in view the current deployment of DRM digital radio receivers in the cars and the development of standalone digital radio receivers in India and abroad, we are confident that digital radio broadcasting in India would be quite popular in the very near future. Even during the intervening period till sufficient numbers of digital radio receivers are available at affordable prices with the listeners, the broadcasters can transmit in digital for some time in a day and gradually increasing the time of digital transmission. Broadcasters should therefore be allowed to broadcast in digital and/or analogue.



**Q 8. In case auction of remaining FM channels of Phase-III is delinked from technology, whether FM Radio broadcasters who adopt digital technology be permitted to broadcast multiple channels on single frequency? Please give your suggestions with detailed justification.**

**Comments of the DRM Consortium:**

Private broadcasters should be permitted to broadcast multiple programmes within the allocated frequency band. Following justification is furnished in support:

- i. A frequency (actually a frequency band when we refer to digital broadcasting) is being offered to a broadcaster and he should have full liberty to utilise it optimally as and when required.
- ii. Digital broadcasting certainly enables the broadcasters to offer more content choice, complemented with multimedia content but development of content is quite expensive. Thus a broadcaster may not be in position to create all the services simultaneously and may be interested to gradually introduce additional services. Also the broadcaster may like to dynamically adjust the quality (bit rate) of their services and also the number of services depending upon the type of programme(s) and their popularity. Thus broadcaster should have full freedom to broadcast number of services in digital and also to adjust their number/quality dynamically.
- iii. Option to broadcast multiple services will be a great incentive to a broadcaster which is very much required to popularise digital services,

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