

*"Working for quality
and diversity in
British broadcasting"*



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Response to Digital Britain Final Report – The Radio Proposals

Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in British broadcasting and new media. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British broadcasting system.

Introduction

There has not been a request for responses to the digital radio proposals in the final Digital Britain Report. We consider that recommendations that will involve most citizens from all strata of society, changing how they listen to the radio, should have been the subject of a formal consultation exercise.

VLV has been representing the interests of listeners and viewers for over 25 years and believes it important that it should make this submission on the proposals for digital radio included in the final Digital Britain Report.

VLV members fully support most advances in broadcasting technologies. We ensure that our members are kept informed about digital radio developments through formal sessions at conferences and hands-on demonstrations. We have had representatives on the relevant committees dealing with the consumer interests in both digital television and radio. However we have serious concerns about the proposal to switch from analogue to digital radio broadcasting by the end of 2015. The timescale will force the most vulnerable and at-risk citizens, those most dependent on radio, to adopt unfamiliar technology before the coverage issues have been fully resolved. We also have concerns about the quality of the proposed £20 set, including the functionality of all models and the digital technology chosen for this project. We also have wider concerns about the funding of this proposal which will be met mostly from the licence fee - which is already threatened. There will be considerable costs to most citizens

1. The criteria that will trigger the date of switch-over

It is expected that the criteria for switch-over will be met at the end of 2013, just over four years away, and that switch-off of analogue will happen two years later. For reasons outlined at 4 below we consider that the second target is very optimistic.

Despite submissions from consumers, the criteria to be met when switch-over can begin are still restricted to:

- 1) *When 50% of listening is to digital; and*
- 2) *When national DAB coverage is comparable to FM coverage, and local DAB reaches 90% of the population and all major roads.*

We assume that the 50% figure of listening to digital has the same meaning as outlined in the interim report i.e. listening to all devices which would include mobile telephones, computers and digital TV. This means that the 50% of consumers still listening on analogue sets would have just two years to switch. We support the statement in the submission of the Consumer Expert Group in response to the interim report.

The proposed migration criteria of 50% of all listening through digitally enabled devices is too low, and disproportionately affects disadvantaged groups who are less likely to be represented in the first 50% to take up digital radio.

The two years allowed for a move of the 50% of the citizens least aware of new technologies to new radios is harsh and unrealistic. TV digital switch-over usually just required the purchase of a set top box for each set. Radio digital switch-over will require a completely new radio receiving system for each set in the home. VLV concluded their press release on the final Digital Britain report as follows: *“Many older listeners, for whom their existing analogue radios are a vital link with the outside world will look on this proposal with alarm.”* The alarm will be accompanied by incomprehension and resentment.

We welcome the use of a range of platforms to extend radio listening, however we expect that individual sets will always be the prime platform for radio.

2. The time scale for switch-over is unrealistic and the funding of transmitter build is unclear

The BBC is committed to near universal coverage i.e. 98% of the population. In evidence to the interim Digital Britain report the BBC stated that 90% population coverage could be achieved by 2011. However it would take another seven years to reach the remaining 8%. The 90% figure would be achieved with 140 extra transmitters. The BBC Director of audio and music, Tim Davie, said on BBC Radio Four *Feedback* in late June 2009 that it will take a further 600 transmitters to reach 98%. The costs of these upgrades will have to be met from a licence fee that is under threat. It cannot come from the budgets for programme production where quality is already suffering from the current 15% cuts. There have been calls for help with the funding from across the industry. However, while the BBC has a commitment to universality we do not think it is realistic to expect commercial interests to fund coverage of the sparsely populated regions and nations.

Paragraph 2 of chapter 3b does address the economic issues *.....radio is, in most respects, bar those of the imagination, a small-scale medium. The costs of a dedicated digital platform are comparatively small –the tens of £millions rather than*

the £billions that television, fixed networks, mobile communications, or broadband require. However the budgets of BBC radio networks are also measured in 10s of £millions and cannot fund the costs of digital switchover.

3. The costs to the consumer

If the proposal fudges the costs to the BBC and therefore the licence fee it fails completely to address the costs to the consumer. We comment in detail on the "£20" DAB radio below. There is no indication what it will cost the every household in the UK to switch to digital radio from FM.

4. The Coverage

The report assumes that coverage is at present adequate in the areas where DAB can be received. There is much anecdotal evidence that DAB reception is very patchy even in the densely populated south east. It took several decades to achieve the current 98% VHF coverage. We question if the 90% trigger criteria can be achieved by 2013 and are convinced that universal coverage is probably a decade away. Before the switch-off of analogue radio can be contemplated there must be certainty that the new technology will deliver the same quality and coverage i.e. 98% or better. The VHF roll out occurred while all national stations were still available on AM or LW and was an alternative. The digital switch over proposals do not include this safety net.

5. The £20 DAB radio is misleading

At paragraph 39 of the executive summary there is a commitment to total DAB broadcasting by the end of 2015 and the following; *the supply chain to deliver a range of DAB radios at the key sub-£20 price point that makes swap-out economic.* We question if, even with the economies of volume production, a digital radio with a retail price of £20 is realistic.

The proposal of a £20 radio also fails to recognise the entire problem of the current ownership and use patterns of radios. UK citizens own a range of equipment most of which cost more than £20. In a typical household there is likely to be a device for receiving radio in many of the rooms. The majority will be radio sets; there will be receivers in other domestic devices such as radio alarms and CD players. Some will be components in a Hi-Fi system. Some could be suitable for swapping with a cheap DAB radio. However if current receivers are replaced with cheap digital sets we are expecting the citizens of this country not only to go out and buy new equipment but also to possess an inferior receiver. In many cases they would have abandoned a good analogue radio for a bottom of the range DAB radio. They will have to stop using cherished equipment that is still serviceable. We consider that the speed of the change will alienate many people.

We welcome the suggestion at paragraph 32 of chapter 3b *We also urge manufacturers to look closely at the market opportunities for DAB to 'FM re-broadcasters', a set-top box solution for analogue radio, as a means of allowing existing analogue radios to receive DAB in the future.* If these could be on the basis

of one re-broadcaster per household it might resolve our concern about the loss of so much good and still usable analogue equipment. However we are not convinced that the industry will see a good business case for re-transmitters when they are eyeing up the much bigger wind fall of re-equipping the nation with DAB receivers just because the analogue signal is switched off.

6. The wrong technology has been chosen

We do not propose to repeat the debate on the choice of the most appropriate technology well covered in earlier reports on the future of radio. We note the arguments in chapter 3b for retaining DAB as the way forward, however DAB is 1990's technology that the rest of Europe has rejected. The next generation technology is superior and should be the basis for the digital radio switch-over. The concerns about 9 million DAB sets sold can be dealt with by the use of re-broadcasters. From now on there must be strenuous attempts to ensure that the technology is as future-proof as possible. The commercial sector, which is part of the drive behind the early adoption of digital radio switch-over, would be foolish to allow itself to be encumbered with an old technology. The environmental concerns of the 21st century mean that days of dumping equipment every few years as it becomes obsolete should be over.

7. Concerns about the functionality of digital radio sets

We welcome the RNIB commissioned research into the equipment needs of blind and others for accessible and useable digital radios. We support the conclusion that manufacturers have not sufficiently considered the needs of disabled and older people. There is anecdotal evidence that many consumers find many digital radio sets have poor functionality. A radio set that severely challenges a consumer with sight or dexterity problems will also annoy all other consumers for the life of the set. Paragraph 32 of Chapter 3a begins *DAB receivers must also be attractive and affordable*. We consider they must first be usable and the technology future proof.

8. Long Wave

The final Digital Britain Report is silent on the future of long wave. We understand that it is only used by the BBC and it is for the corporation to determine the future use of this spectrum. At present it ensures that BBC radio four can be received across the entire UK and the near continent. We understand that it is the frequency that will be used in a national emergency. We consider that the retention of this frequency is important as many analogue radios are still capable of receiving the transmissions

9. Community Radio

We support the concept of community radio and are pleased that there are 150 stations broadcasting. We consider that radio is an ideal medium for communications within community, faith or cultural groups. It is relatively simple to use and economical to produce and receive. The analogue radio receiver is a well established technology that nearly all the population can use. However we do not

consider that the VHF spectrum should be allocated to community radio in 2016. This is a valuable national resource that might in the long term be best used for community purposes. However at present it is the platform that ensures the UK nations and regions are able to receive the UK wide and national radio programmes. Until our concerns about coverage at 4 above are met the need for a robust platform for community radio must take second place to the needs of the wider UK audience.

10. The Description – Digital Radio Upgrade is misleading.

We are concerned that the proposals in chapter 3b of the final Digital Britain Report have been given the title *Digital Radio Up-grade*. This is very misleading.

- The proposals are for improvements in the coverage of the transmitters
- There are no proposals to up-grade to the WorldDMB profile.
- The citizens of this country may not be up-grading but could be throwing out good analogue receivers and replacing them with inferior digital models whilst receiving only a very modest increase in programme choice

Conclusion

The Digital Britain report makes a very good case for the unique nature of radio*being a flexible medium, radio's appeal to the listener is that it is more than simply a stream of audio: it is an intimate, portable and ambient medium; and it is a very personal medium: the pictures that it forms inside our heads are different for every listener. To remain true to that breadth of appeal to listeners, we argue that radio needs a future on its own, dedicated, digital platform* –Chapter 3b paragraph 2. Radio is a vital element in the lives of many citizens of the nations and regions of the UK. The switch from analogue to digital will be a major change for the medium. The change can only happen when the correct technology has been chosen and tested and when listeners have sufficient confidence in the change. Implicit would be the evidence that they have adopted the new technology in the numbers similar to those that have currently taken up digital television (85% - 90%). This figure must be for listeners, not households. As we explain above, the proposals in the final Digital Britain Report indicate an approach that is too fast and will risk alienating all strata of society, while putting at risk a well trusted media that is vital to many of the most vulnerable and isolated of our fellow citizens.

Voice of the Listener & Viewer September 2009