

House of Lords Select Committee on Communications
Evidence to Enquiry on Digital Switchover of television and radio

CONTENTS

INTRODUCTION AND SUMMARY	2
A. THE STATE OF THE GOVERNMENT'S PLANS FOR SWITCHOVER TO DIGITAL RADIO	3
B. OUTSTANDING TECHNICAL ISSUES	3
1. Coverage	3
2. Long Wave and other analogue broadcasts	3
3. Sound quality of digital radio broadcasts	3
C. THE APPROPRIATENESS OF DAB AS THE DIGITAL RADIO STANDARD	4
D. THE CONSUMER PERSPECTIVE	4
1. The two criteria that will trigger the date of switchover	4
2. The two year period planned for digital switchover of radio transmissions is inadequate	4
3. The cost and scale of the switch to digital radio for consumers	5
4. The functionality of digital radio sets	5
5. The Digital Radio Divide	5
6. Sound quality of digital radio broadcasts	5
7. Radio in road vehicles	6
8. The use of radios during national and local disasters	6
9. Regions and Nations	6
10. Community Radio	6
11. The adoption of some of the successful elements in the arrangements used in Television Digital Switchover for any radio switchover plans	7

Robert Clark Secretary to the VLV Board is the contact for this response

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Voice of the Listener & Viewer Evidence to Enquiry on Digital Switchover of television and radio

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. 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 AND SUMMARY

Our evidence will concentrate on the proposals for a switchover to digital transmission of radio as we consider this is the area of the enquiry where we have something unique to contribute.

The proposals for the switch to digital broadcasting of most radio in the UK come from the Digital Britain Final Report. The 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.*

In addition to considering the proposals in the Digital Britain Final Report we also indicate aspects of the process that will have a major impact on consumers and citizens.

Our evidence includes comments on the following:

- The state of the governments planning
- Outstanding technical issues especially coverage.
- The change should only happen when the correct technology has been chosen and tested
- The criteria to be met to trigger the change
- The speed of the proposed timetable
- The cost of the change to each listener
- The functionality of the equipment
- The sound quality of digital broadcasts,
- Digital Radio in road vehicles
- The impact on broadcasting in the Nations and Regions of the United Kingdom,
- Community Radio and Analogue

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 switchover should only happen when listeners have sufficient confidence in the change. Implicit should be the evidence that consumers have adopted the new technology in the numbers similar to those that had converted to digital television when switchover began. This figure must be for listeners, not households. As we explain below the proposals in the Digital Britain Final 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.

VLV has been involved with digital switchover as a member of the various consumer expert groups that have been set up throughout the switchover process. We have taken a particular interest in the proposals for radio, commenting on the three Ofcom consultations since 2004 and serving as one of two consumers on the Digital Radio Working Group in 2008.

A. THE STATE OF THE GOVERNMENT'S PLANS FOR SWITCHOVER TO DIGITAL RADIO

Following the final Digital Britain Report we are aware that the government is working on the detailed plans for the switchover. We have major concerns about the impact on consumers of the plans as outlined in the report which we cover in section D. On the basis of our experience of the planning for TV Digital Switchover (DSO) we have no reason to doubt that the plans for radio will be thorough but await the details before making a final judgment.

However we draw attention to two factors:

1. A cost benefit analysis (CBA) was undertaken for Ofcom and delivered in February 2009. The CBA makes a number of fundamental recommendations and indicates areas for further appraisal. We hope the government has taken note of the CBA. Some of the findings reflect our consumer concerns covered below.

2. Radio DSO will be a totally different consumer experience from TV DSO as most consumers will need to purchase new equipment rather than just a set top box. It is important that the government plans reflect this rather than just replicate the current TV DSO project.

B. OUTSTANDING TECHNICAL ISSUES

Our concerns about technical issues and the appropriateness of DAB as the digital radio standard overlap in part with our concerns about the impact on the consumer covered at D.

1. Coverage

The Final Digital Britain Report painted an optimistic picture of DAB reception. 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 for the UK. The final Digital Britain Report expects that by 2013 national DAB coverage will be comparable to the 98% FM coverage, and local DAB will reach 90% of the population and all major roads. This is one of the triggers for radio DSO in 2015. We question if these reception trigger criteria can be achieved by 2013 and consider that universal coverage of DAB 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. This is important as analogue reception deteriorates gradually and listeners in poor reception areas still receive a signal but with loss of quality. Digital reception ends abruptly with annoying popping sounds. We are also concerned that the 98% figure should apply to the national stations in the Nations. See D9 below.

The last major change in radio transmission systems was the introduction of VHF. The VHF roll out occurred while all national stations were still available on AM or LW. There was an alternative. At present the digital switchover proposals do not include this safety net as at present most analogue transmissions will cease at switchover.

2. Long Wave and other analogue broadcasts.

The final Digital Britain Report was 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 4 can be received across the entire UK and the near continent. We consider that the retention of this frequency is important as many analogue radios are still capable of receiving the transmissions.

3. Sound quality of digital radio broadcasts.

We cover this in detail at D 6 below

C. THE APPROPRIATENESS OF DAB AS THE DIGITAL RADIO STANDARD

VLV considers that the wrong technology has been chosen. DAB is 1990's technology that the rest of Europe has superseded. The next generation technology is superior and should be the basis for the digital radio switch-over. From now on there must be strenuous attempts to ensure that the technology used in radios 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 the days of dumping equipment every few years as it becomes obsolete should be over. We welcome the undertaking in the white paper that the government will promote receivers which are capable of utilising all the digital technologies being introduced across Europe. Some manufacturers are already producing radios that can be upgraded as new transmission technologies are adopted.

D. THE CONSUMER PERSPECTIVE

VLV represents the interests of listeners as citizens and consumers so we have a number of issues we wish to bring to the attention of the committee with regard to the proposal to switch from analogue to digital broadcasting in 2015.

1. The two criteria that will trigger the date of switchover

In the government plans there are two criteria that must be met before radio DSO can begin:

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

It is expected that these criteria will be met in less than four years i.e. at the end of 2013 and therefore the switch-off of analogue will happen two years later.

We do not accept the first criterion. We are aware that it is the government case that when there are 50% listening to DAB there will be many more DAB enabled homes. A DAB enabled home would include mobile telephones, computers and digital TV. There are currently 33% DAB enabled households but only 13.3% listen on DAB radios and around 8% on other devices. The Rajar figures for the third quarter of 2009 indicate 66% continue to use analogue radios. We consider that there should be in excess of 80% of the population listening regularly to DAB broadcasts i.e. listeners not households before switchover can begin, a similar number to those that had made the move to digital at the start of TV switchover .

We consider that the second criterion is very optimistic as outlined above under "coverage" at B 1 above. It is also two years earlier than the 2017 date suggested by the Digital Radio Working Group which VLV considered optimistic.

2. The two year period planned for digital switchover of radio transmissions is inadequate as switching will be very different from the experience of television

A switchover to digital transmission for radio will be a totally different consumer experience from the TV DSO as it is possible that most consumers will need to purchase new equipment rather than a set top box. There are many more radios in use than televisions so it will be a more expensive task replacing like with like. The controls and displays will be different. Tuning may be different. If the government insists on a two year period between DSO criteria being met and switch off then consumers will have little time to make the change and adapt. The two years allowed for a move of many citizens least aware of new technologies to new radios is harsh and unrealistic. TV digital switchover usually just required the purchase of a set top box for each set. Radio digital switchover

will require a completely new radio receiving system for each set in the home. Many older listeners, for whom their existing analogue radios are a vital link with the outside world, will look on this proposal with alarm. We consider that the speed of the change will alienate many people and at least 5 years should be allowed for the switch once appropriate criteria have been met. This is about the time allowed for the TV switch.

3. The cost and scale of the switch to digital radio for consumers

We are very concerned that the scale of the change in the average household has not been fully recognised. The final Digital Britain Report makes great play of the £20 DAB radio. This fails to recognise the scale of the entire problem of the current ownership and use patterns of radios. UK citizens own a range of equipment. 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 asking 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. They will have to stop using cherished equipment that is still serviceable. At least one “top of the range” manufacturer produces VHF radios and provides a DAB rebroadcaster; this technology may help the switch but will only be suitable in a minority of situations.

4. The functionality of digital radio sets

We welcome the RNIB commissioned research into the equipment needs of blind and others for accessible and usable 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. The final Digital Britain report states *DAB receivers must also be attractive and affordable*. We consider they must also be usable and the technology future-proof. There must be some equipment available that is usable and accessible by all, what ever their disability.

Digital Radios can have many more functions than an analogue radio. One of the advantages of digital transmission is that much more information can be provided on display screens: this includes electronic programme guides and background material on the broadcast such as match scores. This can extend to audio description for the blind and partially sighted. It is also possible to record or stop a programme and return to it without loss of content. However all these additional functions make the operation of the digital sets very different from analogue. There is evidence from TV DSO that many consumers want new equipment to be as simple and as similar to the existing experience as possible.

5. The Digital Radio Divide

The above paragraphs indicate that there is a significant radio digital divide. There is little research into why the use of DAB radios is still low and why take up is slow in some demographic and age groups. VLV considers that before any plans for radio DSO are finalised the government must investigate the “digital divide” in radio listening.

6. Sound quality of digital radio broadcasts

We are concerned that in order to fit more stations on to a digital multiplex the low bit rates and signal compression used for each radio station are inadequate for reasonably high quality sound. Some points:

- The 192 kbs used for Radio 3 is just about adequate but deteriorates when radio 5 Live Extra is broadcast and the kbs drop to 160.

- Many visually impaired people, including some of our members, notice that the sound quality deteriorates when the bit rate is reduced on DAB broadcasts. If a major reduction takes place many listeners notice a difference.
- Professional musicians and many amateurs notice deterioration in the quality of sound across different radio stations with different bit rates and compression.
- When specialist magazines test even relatively inexpensive radio tuners they regularly comment that the full potential of the technology can only be assessed by tuning to BBC Radio 3, and that even this station is not always satisfactory. Generally the DAB sound quality is found to be unsatisfactory in the UK.

There is a significant minority of consumers who are aware they have been deprived of good sound quality in broadcasts. The rest of the listeners who have less acute ears are also being deprived of good quality sound and might notice the difference if given a demonstration in proper listening conditions. There remains the possibility of a tangible loss in public value if commitments to high-quality sound are weakened.

7. Radio in road vehicles

There are 30 million cars on the road and very few have DAB radios fitted in either new or existing vehicles. Around 20% of radio listening is in cars. This issue is well aired in the final Digital Britain Report. If all vehicles that are sold by the end of 2013 are fitted with DAB enabled radio that will not resolve the problem of radio reception in those remaining. There needs to be very good evidence that there are viable technical solutions in place for these vehicle owners before a switchover date is announced. This is in addition to the problem of DAB reception referred to above.

8. The use of radios during national and local disasters

We understand that long wave is the frequency that would be used in a national emergency. Long wave is only used by the BBC. At present it ensures that BBC Radio 4 can be received across the entire UK and the near continent. At present there do not appear to be any plans in place for the long term future of this spectrum. The recent flooding in Cumbria demonstrated the value of local radio as the BBC station could be received over much of the area and remained "live on air" for the entire first weekend of the disaster. VLV hopes that there will not be a major national disaster but notes that local disasters are becoming a frequent occurrence. VLV is not convinced that DAB will be able to provide either the national coverage of LW or the local coverage of VHF for many years should disasters occur.

9. Regions and Nations

There are vibrant and distinctive radio services in Wales, Scotland and Northern Ireland, with a good spread of local stations in the English regions. There are Welsh and Gaelic services in Wales and Scotland respectively. VLV shares the concern in the Nations and rural areas of England that they will swap a system that ensures almost universal coverage with VHF analogue broadcasts for a digital system that currently has very poor coverage. We also consider that DAB coverage for the national stations in the nations of the UK should be comparable with the current 98% VHF coverage.

10. 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 immediately at radio DSO. 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 coverage by digital is proved to be as good as VHF the

need for a platform for community radio must take second place to the needs of the wider UK audience for a reliable and robust radio technology. If the government insists that radio DSO should be undertaken in a very short time scale then there should be a period of parallel transmission on VHF and analogue until the coverage and take up has been fully tested. See our comparison with the adoption of VHF at coverage B 1 above.

11. The need to adopt some of the successful elements of the arrangements used in Television Digital Switchover for any radio switchover plans

We hope that the government will adopt a longer time scale for any switch to digital radio broadcasting so that the needs of consumers are met. However we accept that at some time in the future analogue may be switched off. We therefore urge that some successful elements of the television switchover process are adopted. These include:

- An independent body similar to Digital UK is established with the same arrangements for consumer input.
- The establishment of a help scheme for the vulnerable is established.
- A “digital tick” scheme on equipment is introduced so that consumers can quickly check which facilities are included. A scheme should be introduced as soon as possible whatever time scale is adopted for radio DSO.

Voice of the Listener & Viewer
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