

CMFE

COMMUNITY MEDIA FORUM EUROPE

Contribution from the CMFE, the Community Media Forum Europe, to the Public Consultation/Call for Input in preparation for the Radio Spectrum Policy Programme

Introduction

The Community Media Forum Europe (CMFE), is a gathering of policy experts, non-governmental organizations, Community Media (CM) and national community media federations which, since 2004, supports the participation of the CM sector in policy debate and decision making at the European and national level. At present, the CMFE has 48 members from 19 different European countries. CMFE works closely together with AMARC-Europe, the European branch of the World Association of Community Radiobroadcasters. There are thousands of community radios and televisions active around Europe. Most are operating on a small-scale basis (locally oriented). CM contribute to media pluralism, to cultural diversity as well as to social and territorial cohesion.

In UNESCO's report on "Media Development Indicators" the importance of including CM in media policy is highlighted: "*In general, a diverse mix of public, community and private media is best achieved through legal, financial and administrative measures, with specific provisions to encourage community media and, in the broadcasting sector, a fair and equitable allocation of the spectrum."¹.*

The CMFE has been working in collaboration with European institutions to raise the profile of CM across Europe and, in recent documents, the social value of the sector has been reaffirmed by the 'Declaration of the Committee of Ministers on the role of community media in the promotion of the social cohesion and the intercultural dialogue'², adopted by the Council of Europe on 11 February 2009, and the 'Resolution of 25 September 2008 of the European Parliament on Community Media in Europe (2008/2011 (INI))'³.

Council of Europe

The Declaration of the Council of Europe, among other things, stresses its Members States take in account the desirability of:

"iv. a recognising the social value of community media and examining the possibility of committing funds at national, regional and local level to support the sector, directly and indirectly, while duly taking into account competition aspects"

and

"ii Draws attention to the desirability of allocating to community media, to the extent possible, a sufficient number of frequencies, both in analogue and digital environments, and ensuring that community broadcasting media are not disadvantaged after the transition to the digital environment;"

¹ [Media Development Indicators: A framework for assessing media development](#). Endorsed by the Intergovernmental Council of the International Programme for the Development of Communication (IPDC) at its 26th session (26-28 March 2008), page 26

² <https://wcd.coe.int/ViewDoc.jsp?id=1409919>

³ <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P6-TA-2008-0459&language=EN>

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More specifically on 'Digital Dividend' the Committee of Ministers of Council of Europe adopted on 20 February 2008 the '*Declaration of the Committee of Ministers on the allocation and management of the digital dividend and the public interest*'⁴:

"Aware of the fact that technical and legislative choices involved in the switchover to the digital environment should not be determined by economic factors alone but ought also to take account of social, cultural and political factors, and agreeing that a balance must be struck between economic interests and objectives of common interest;"

and

"Conscious that a balance might need to be struck between the development of a purely market-based approach to spectrum allocation and management, on the one hand, and the promotion of pluralism, cultural and linguistic diversity and access of the public to audiovisual services in Europe, in particular free-to-air broadcasting, on the other hand;"

European Parliament

On 25 September 2008, the European Parliament adopted the '*Resolution on Community Media in Europe (INI/2008/2011)*'⁵, in which it stresses that Community Media are an effective means of strengthening cultural and linguistic diversity, social inclusion and local identity, as well as media pluralism:

"G. Whereas community media fulfil a broad yet largely unacknowledged role in the media landscape, particularly as a source of local content, and encourage innovation, creativity and diversity of content,"

and

"19. Calls on Member States to make television and radio frequency spectrum available, both analogue and digital, bearing in mind that the service provided by community media is not to be assessed in terms of opportunity cost or justification of the cost of spectrum allocation but rather in the social value it represents;"

On 24 September 2008 the European Parliament also adopted the '*Resolution on concentration and pluralism in the media in the European Union (INI/2007/2253)*'⁶. The Resolution:

"24. Welcomes the dynamics and diversity brought into the media landscape by the new media and encourages responsible use of all the new technology such as mobile TV as a platform for commercial, public and community media;"

⁴ <https://wcd.coe.int/ViewDoc.jsp?id=1252459&Site=CM&BackColorInternet=DBDCF2&BackColorIntranet=FDC864&BackColorLogged=FDC864>

⁵ See footnote 3

⁶ <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P6-TA-2008-0459&language=EN>

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CMFE's opinion

The CMFE stresses, in line with the above-mentioned declarations and resolutions, the importance of taking into account the social and cultural needs of European citizens in regard to the opportunities the digital developments offer and the important role CM can or should be able to play to meet these needs. Regarding the Public Consultation, we would prefer to focus on *the needs for adequate frequencies, both in the analogue and digital broadcasting era.*

Community Television

For example, in the Netherlands the frequencies reserved for digital terrestrial broadcasting are lacking possibilities for local public television stations to participate. Four pilot projects with local DVB-t were very promising, but had to be stopped because of international spectrum coordination issues. These four stations lost their investments and for the other more than 150 local TV-stations the participation in DVB-T developments remains blocked.

In Spain, the new law on the promotion of the Information Society (*Ley de Medidas de Impulso de la Sociedad de la Información, LISI of 20 December 2007*) recognizes for the very first time in the state the "not-for-profit TV of proximity". According to this 'LISI', these TV stations could apply for digital licenses. But this new legal framework also specifies that the spectrum reserved for proximity TV is not a priority in comparison with the other broadcasting services. This results in an unbalanced competition between 'small-scale TV-stations' and 'large-scale TV-stations'. Because of the stronger economical base (serving larger areas with bigger audiences) of larger-scale TV's, small-scale TV's will almost certainly be excluded from participation in the digital era. What is more, the Law Regulations serve to increase this inequality among broadcasters in terms of frequencies coverage and period of validity.

In Ukraine the regional and local TV channels also expressed their concerns regarding digital developments and recommended at the international conference on *'Regional and Local TV Channels: Possible solutions for distribution in the digital environment'*, held in Kyiv on 28 April 2009:

"(...) to the government of countries, which had already started the process of launching digital TV, to take all needed actions for the elaboration of the conception of launching digital TV on local level, including learning supplementary possibilities of the radio frequency for the aims of local broadcasting and conducting experimental building of digital air mini-network using low-powered transmitters."

and

"2. Acknowledge that the rejection of bodies of state power to give the license on building digital air mini-network using low-powered transmitters is the limitation of right to free broadcasting of information, which is not justified with technical problems and contradict the requirements of the Article 10 of the European convention of Human Rights."

There are examples of promising initiatives to let community like services participate in the digital broadcasting era. In Norway Frikanalen is distributed on the digital terrestrial network, which at the end of 2010 will cover most of the country.⁷ Frikanalen is an "open channel", which means that everyone, organization or individuals, has access to air their programmes on the channel. Frikanalen is so Europe's first digital community TV channel.

⁷ <http://frikanalen.no/english>

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Also in *Denmark* licenses have been granted to community media organizations to broadcast on national and regional DVB-T networks. “*Denmark’s radio and TV authority has issued 220 broadcast permits in the new digital terrestrial network (DTT) for associations and other now-commercial organizations (out of 306 applicants). The starting date is 1 November this year (2009) when the analogue TV-network will be closing down.*”⁸ In Austria the first community TV starts their digital broadcast end of June 2010 on a regional DVB-T multiplex.

Community Radio: Analogue FM

CM Still lack adequate frequencies on analogue FM. Analogue FM is still the most important distribution platform for ‘traditional’ radio. In every household there are several receivers and the quality of service, provided by analogue FM, is for most citizens more than adequate. CMFE therefore is strongly opposing phasing out analogue FM. We demand urgent action, initiated and supported by EU, to provide adequate FM-frequencies for community radio stations.

Community Radio: digital broadcasting

The digitalization developments as described for community (local) television also apply to the developments for local, community radio. Until now the chosen digitalization technologies hinder instead of challenge the participation of small-scale radios. It is absolutely necessary to invest in digital radio technologies that offer smooth transition possibilities from analogue FM to digital radio technologies as e.g. DRM+. DRM+ was recently successfully tested in Germany (Hannover, August 2009)⁹ and France (Paris, July 2009)¹⁰.

CMFE also demands access for CM to the developments of DAB. Since the introduction of DAB+ more frequencies per multiplex are possible, but to be able to profit from this development, small-scale multiplexes should be planned. Until now, only large-scale multiplexes are planned and developed. Only in The Netherlands small-scale multiplexes are part of the DAB-planning. But these small-scale multiplexes are planned for the L-band. But in this band problems with e.g. in-house and mobile reception are still unsolved. Large-area covering multiplexes require investments that are too high for CM and offer coverage areas which don’t meet the needs for CM. Since the L-band offers inadequate quality, CM demands small-scale DAB-services in Band III or, if not yet possible, access to regional DAB-multiplexes. In that way citizens will be able to receive CM at the same quality as other radio services using Band III.

Not only should it be envisaged to ensure that all new digital *TV receivers* are guaranteed “future-proof”, this should also apply to *radio receivers*. The technology is available to build radio receivers that operate with all available digitalization/compression/transmission standards: DAB, DAB+, L-Band, DRM, DRM+, HD-Radio.¹¹

⁸ <http://blogs.mw.nl/medianetwork/digital-terrestrial-television-opens-for-the-civil-society-in-denmark>

⁹ <http://www.drm.org/news/detail/news/drm-field-trial-in-germany/>

¹⁰ <http://www.drm.org/news/detail/news/first-drm-demo-in-band-i-in-paris/>

¹¹ See for example [EE Herald, 16th Oct 2009](#): “(...) NXP Semiconductor has developed SAF3560 in partnership with digital HD radio expert iBiquity. The SAF3560 is a software programmable device making it easy for audio developers to allow their audio system to switch between standards. SAF3560 supports NXP’s DRM, DAB, DAB+, T-DMB software programmable platforms. Audio system by Audi based on this chip allow its users to access more than 1,800 AM/FM stations and 900 multicast channels currently on the FM dial.

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This is possible (and should be ensured at least for the period of transition from analogue to digital, until this period is completed) with remaining fully backward compatible with the analogue FM standard. Such a measure is essential for the successful introduction of digital radio technologies and would help to quickly generate a critical mass of new digital radio receivers, a critical mass of audience for these receivers and accelerate radio broadcasters towards deploying this new digital radio technique.

Conclusion

Community media urgently need extra frequencies in the analogue FM-band to be able to contribute to cultural diversity, media pluralism and social and territorial cohesion. This applies also for digital transmission techniques: CM urgently need extra guarantees for participation in the digital broadcasting era to benefit also from the 'Digital Dividend'. New digital technologies need to offer challenges instead of threats to the community media sector. This needs extra attention because until now only large scale broadcasters and commercial media and communication services tend to profit from the chosen digital technologies.

We demand adequate access to digital broadcasting of local community television. This should be enabled by reserving frequency space for small DVB-T blocks with low power transmitters. For radio, technologies such as DRM+ should be stimulated alongside support for DAB-technologies. To guarantee a smooth transition from analogue to digital radio, radio receivers should be 'future-proof': the radio receiver industry should be obliged to build multi standard receivers.

We also urge you to continue to allow member states to impose 'must carry' obligations on all networks, including digital audio and video multiplexes, for the distribution of community media to the public.¹²

CMFE urges to set aside sufficient spectrum for the further development of local and community television and other community media services in every country.

Yours,



Pieter de Wit

President,
Community Media Forum Europe

¹² DIRECTIVE 2002/22/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services (Universal Service Directive), under (43)

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