

Bundesministerium für Wirtschaft und Energie
10115 Berlin
Germany

31 January 2019

cc: Helwin Lesch, Bayerischer Rundfunk

Dear Sir

I write concerning the proposed Amendment to the German Telecommunications Law – specifically, section 48 relating to the interoperability of radio receivers.

I write on behalf of WorldDAB, the international association responsible for supporting the successful uptake of DAB digital radio in Europe and around the world. We are a not-for-profit association with over 100 member organisations from 30 countries. Our members include government ministries, media regulators, public and private broadcasters, network operators, car makers, receiver manufacturers and technology providers. A key part of our mission is to ensure collaboration amongst all these stakeholders.

WorldDAB strongly supports the proposed change to the German Telecommunications Law – i.e. the requirement for consumer radio receivers capable of displaying the name of a radio station to be able to receive digitally transmitted content. We understand that digitally transmitted content could be delivered, for example, via DAB+ or IP.

The proposed amendment is consistent with Article 113 of the European Electronic Communications Code (EECC) which entered into force on 20 December 2018. In addition to requiring new car radios across the EU to be capable of receiving digital terrestrial radio (as outlined in Annex XI), the EECC also allows Member States to “adopt measures to ensure the interoperability of other consumer radio receivers”. The proposed amendment to the German law is consistent with this clause.

The fact that the EECC includes sections relating to the interoperability of car radio and consumer radio receivers (Article 113 and Annex XI) reflects the strong progress being made by digital radio across the EU.

Ten years ago, only four countries in Europe had DAB / DAB+ services (the UK, Norway, Denmark and Switzerland). Since then, we have seen the launch of national services in Germany (2011), the Netherlands (2013), Italy (2014), Slovenia (2016) and Belgium (2018). Services are also on air in parts of Poland, the Czech Republic, Austria, Spain, Malta and Croatia. The most recent news comes from France, where six cities now have DAB+ services and national services are expected to be on air from 2020.

As part of their commitment to digital radio, both France and Italy have already passed legislation similar to that proposed for Germany which will require consumer radios (as well as automotive radios) to be capable of receiving digital signals.

We see the proposed change to the German Telecommunications law as an important building block in helping to accelerate the development of digital radio not only in Germany but also across Europe. This will bring significant benefits to listeners, broadcasters and manufacturers. We therefore strongly support the amendment.

Kind regards

A handwritten signature in black ink that reads "Patrick Hannon". The signature is written in a cursive style with a large initial 'P' and a long horizontal stroke at the end.

Patrick Hannon
President WorldDAB