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TRAI – Telecom Regulatory Authority of India

110029 Delhi  
India

Erlangen, November 8, 2024

Re: TRAI Consultation Paper No 14/2024 "formulating a Digital Radio Broadcast Policy for private Radio broadcasters"

Dear Madam or Sir,

We understand that TRAI is seeking industry feedback regarding the best possible solution for India digitizing the FM broadcast band (VHF band-II) in future.

In our view, opting for an open and globally standardized digital radio technology with full and unrestricted technology access by all stakeholders is highly beneficial to ensure the development of a thriving industry and technology knowledge, as is certainly required under the **Make in India** and **Digital India** initiative.

In this context, we feel that the ITU-R endorsed **DRM Digital Radio Mondiale standard**, as already adopted and/or operational all over Asia-Pacific today including in Indonesia, China, Pakistan, Nepal, and of course India itself, should be the obvious choice. With the successful establishment of a domestic chipset and receiver development industry for the DRM technology in India, as well as millions of DRM enabled car radios on the road in the country today, using this same broadcast standard for the FM band digitization will result in quickest possible availability of a broad receiver basis and ensure widest possible industry support of domestic suppliers.

In addition, DRM is the only digital radio standard with support for the latest **MPEG audio codec standard xHE-AAC**. xHE-AAC via DRM ensures superior stereo quality on AM transmissions in India today, and enables quasi-transparent CD quality in the FM band. In addition, DRM supports up to 5.1 surround sound services for particularly immersive radio experiences and powerful ad presentations.

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For public as well as private broadcasters, one of the key benefits of digitizing radio services lies in the possibility to establish an even closer connection with listeners and improved monetization through new revenue opportunities. For these purposes, DRM supports the **Journaline advanced text application**. Journaline enables broadcasters to trigger and encourage direct listener **interactivity** with the station itself as well as ad partners, including a **real-time audience participation measurement**. In addition, Journaline allows to increase the relevance of ads and information sponsorship by tailoring the textual content in different sub-menus to very specific audience groups by language, location and topic of interest. This results in **highly targeted information and ads** presented to sub-groups of the general broadcast listenership.

Journaline is also a crucial component of **DRM's EWF – Emergency Warning Functionality**, enhancing the audio announcements of analogue radio in case of pending disasters with a multilingual and detailed text information to include hearing-impaired users and non-native speakers or travelers. It also gives listeners in distress situations access to crucial instructions and background information on their radio sets without the need for a working Internet connection.

Considering all the above arguments along with India's history of having achieved one of the biggest digital radio deployments on the planet today in the AM bands, extending the adopted DRM standard also for the FM band is the logical step.

Yours sincerely,

**Marc  
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2024.11.08  
15:32:00 +01'00'

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