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To:

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Telecom Regulatory Authority of India

Subject: HFCC Response (counter comments) to Consultation paper on formulating a Digital Radio Broadcast Policy for private Radio broadcasters

A Short Introduction to the HFCC

The HFCC is a non-governmental, non-profit association, and a sector member of the International Telecommunication Union in Geneva in the category of international and regional organisations. It manages, and coordinates global databases of international shortwave broadcasting in keeping with International Radio Regulations of the ITU.

Shortwave radio was by far the most widely used means of distribution of international broadcasting only a couple of decades ago. In contrast with the rest of the radio spectrum, no acceptable method of assigning frequencies had ever been developed since the discovery of shortwave propagation in the 1920s. The unacceptable level of mutual interference among stations and an improved climate after the end of the Cold War led to the development of global coordination.

Traditional delivery of international broadcasting has been changing rapidly, with the advent of digital technologies and the Internet - this is widely considered to be the future of media content distribution. At the same time there are compelling reasons to believe that broadcasting from terrestrial transmitters will remain an important guarantor of free and universal access to radio and TV programmes, especially during specific context situations of listeners and consumers.

Shortwave frequency management and coordination is the HFCC's core activity and this will continue. The HFCC also provides listeners with free access to accurate frequency and schedule information on its website.

Why Shortwave is Still Important Today

Shortwave has many advantages that other international broadcasting platforms often do not have, such as:

- Broadcasts reach listeners over large areas far from the transmission site
- Shortwave is free to air (no subscription fees)
- The listener cannot be identified
- There isn't any need of an agreement from the administration of the territory where the broadcast is directed
- Receivers can be portable and inexpensive

Radio broadcasting can be considered the most resilient and most widely available tool to reach out to people. Shortwave is an invaluable tool in distance education, and "DRM (Digital Radio Mondiale) transmissions can provide both audio and visual content to students with no Internet access. Shortwave can also provide health information during epidemics, and it often remains the only source of information for the areas affected by disasters, manmade or natural, when local and regional communication networks can be overloaded or destroyed.

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From a technical point of view, currently there is nothing to replace shortwave; one day there may be. We encourage broadcasters to remain committed to shortwave broadcasting to regions where a critical need still exists.

Shortwave Facilities and International Radio for Disaster Relief

The HFCC, in cooperation with the Arab States Broadcasting Union and the Asia-Pacific Broadcasting Union, has developed and implemented an International Radio for Disaster Relief (IRDR) project that is based on the system of online coordination of frequencies managed by the HFCC in accordance with International Radio Regulations. The HFCC is aware of the humanitarian aspects of international broadcasting. It pointed out in 2012 - as a UNESCO partner for the preparation of the World Radio Day - that terrestrial shortwave radio in particular is still considered as a powerful communication and information tool during emergency situations. Receivers are inexpensive and require no access fees. Shortwave radio is important for people living in remote and isolated regions of the world. It reaches across the digital divide to the most disadvantaged and marginalised societies. This is also in keeping with the Declaration and Action Plan of the World Summit on the Information Society.

The DRM Standard has been adopted for Shortwave Bands

On 4 April 2001, the on-air DRM standard, which was earlier recommended by the Radio Sector of the International Telecommunication Union, gained approval by the members of the ITU. The DRM standard has been adopted for shortwave bands by all countries. Many major international broadcasters, including AIR/Akashvani, are using DRM for digital radio services. There is an existing audience awareness of the DRM standard and DRM receiver market penetration. Receiver manufacturers are already delivering receivers which use the DRM standard, and are also able to receive the AM and FM bands.

DRM Benefits

Sound quality can be adjusted with high efficiency audio codecs (AAC). Several broadcasters, including AIR/Akashvani, have successfully tested the Emergency Warning Functionality (EWF) system with DRM to alert populations during disasters. Providing a national EWF using the HF DRM standard should be easier and more cost effective to implement. In addition to audio, data, pictures and multimedia facilities are available in the DRM standard. DRM has been used in educational project initiatives – using DRM to provide educational materials without the need of an Internet connection. This allows for text images and audio to be broadcast to receivers and cached for use and access by students.

The HFCC became an institutional member of the Digital Radio Mondiale (DRM) Consortium in 2000, joining organisations from across the broadcast industry worldwide who have come together to develop a standard for digital broadcasting. We recognise that DRM's aim is to bring affordable, digital, high-quality sound and services to the world radio market that will be successful with both existing and future services operating on other parts of the dial. One of DRM's important objectives is that a receiver bought anywhere in the world will work anywhere in the world.

Warm regards,



Jeff White
HFCC Chairman

