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Date: Mon, 28 Oct 2024 16:05:05 +0530  
Subject: Industry comments on formulating a Digital Radio Broadcast Policy.  
===== Forwarded message =====

**October 28<sup>th</sup>, 2024**

**Shri Deepak Sharma**  
**Advisor (B & CS)**  
**Telecom Regulatory Authority of India**

**Subject: Industry comments on formulating a Digital Radio Broadcast Policy.**

**Reference: Consultation paper on formulating a Digital Radio Broadcast Policy for private Radio broadcasters released by TRAI on 30.09.2024.**

**Dear Shri Deepak Sharma,**

Greetings from India Cellular & Electronics Association (ICEA).

ICEA is the premier industry association that represents the entire electronics ecosystem in India. Our members include Fortune 500 companies, lead brands, EMS companies, and technology providers. ICEA's vision is to establish India as a Global Technology Powerhouse by creating a vibrant ecosystem of innovation, excellence, and sustainability.

As part of our mission to positively contribute to the growth of India's digital economy, we have been exploring the potential of digitising Radio, one of the last analogue services offered by the Government of India.

In this spirit, ICEA released a report in August 2022 on Digital Broadcast Radio in India, that highlighted the need for a vibrant mobile phone ecosystem to support the digitisation of radio in India.

We thank the Ministry of Information & Broadcasting (MIB) and the Telecom Regulatory Authority of India (TRAI) for initiating this consultation process in order to seek stakeholders' comments on various issues relating to the formulation of digital radio broadcast policy for private Radio broadcasters.

The following are our comments on the concerned matter for your perusal:

**Q2. In case a single digital radio broadcast technology is to be adopted for the entire country, which technology should be adopted for digital radio broadcasting? Please give your suggestions with detailed justification.**

India Cellular and Electronics Association (ICEA) advocates for a **phased adoption** of single-standard digital radio technology across the country. The technology should be proven, implemented, and have compatibility across various device ecosystems like cars, Bluetooth speakers, and mobile devices. The technology should be robust enough so that it can be implemented on its merit without government intervention by the device ecosystem.

We believe that HD Radio qualifies for the above parameters and should be implemented in a phased approach to ensure a smooth transition for different product categories, beginning with those that are easiest to integrate.

- **Phase 1: Automotive Sector:** Digital Radio adoption in the **automotive sector** is already gaining traction globally. The automotive industry in India can align with international standards by integrating Digital Radio into **infotainment systems**, which are increasingly becoming standard features in vehicles.

- **Phase 2: Wireless Speakers and Headsets:** **Wireless speakers and headsets** as the first category to adopt Digital HD Radio, as the **chipset module** can be incorporated into existing designs with minimal changes. The global **wireless audio market**, expected to reach **USD 153.2 billion by 2027**, offers a huge opportunity for Indian manufacturers to lead this adoption. HD Radio has already demonstrated **chipsets** suitable for wireless devices, making it a ready solution for manufacturers.
- **Phase 3: Mobile Devices:** Due to the challenges of **antenna and chipset space**, mobile devices will adopt Digital Radio based on the technical feasibility of incorporating this feature into devices. As demand for Digital Radio grows in wireless speakers and cars, global chipset manufacturers will be nudged to integrate this feature into their chipsets as well. Feature phones can adopt Digital Radio first and subsequently smartphones can integrate this feature. The domestic market for FP is estimated to be around 60 million units and Indian brands have a significant presence in this space. HD Radio's **reference design for feature phones** is already available and can be integrated by the device manufacturers based on technical and commercial feasibility.

**Q3. In case multiple digital broadcasting technologies are to be adopted, please specify whether it should be left to the market forces to decide the appropriate technologies and what could be the potential problems due to adoption of multiple technologies? Please suggest probable solutions to the problems, with detailed justification.**

We believe that the market forces are best designed to adopt new technologies which will be technologically and commercially viable and understands the consumer's interests. However, in this case, since we are late in adopting Digital FM technology, adopting **a single digital broadcasting standard**, such as HD Radio, which is a proven technology to avoid market fragmentation and fast adoption. Multiple technologies would lead to **compatibility issues** across regions and devices, complicating manufacturing processes and increasing costs for both manufacturers and consumers. A unified standard allows for **economies of scale** in production, leading to lower costs, streamlined regulatory oversight, and consistent user experiences across the country.

**Q7. What measures should be taken to facilitate the availability of affordable digital radio receivers?**

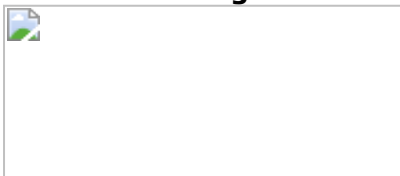
We recommend the following measures to ensure that **Digital Radio receivers** are affordable:

- **Incentives for local production:** Government incentives, such as **tax breaks** or **subsidies**, for manufacturers who produce Digital Radio-enabled devices.
- **Building a Design Ecosystem:** Incentivize brands and manufacturers to enable an ecosystem of designing new products that are integrated with Digital Radio technology.
- **Collaboration with chipset manufacturers:** By ensuring **economies of scale** and offering compatible chipsets at a low cost, manufacturers can easily integrate the technology into **wireless speakers, feature phones, and cars** without significant price increases. These actions will make HD Radio receivers accessible to a larger population.

We look forward to your support in transforming the radio landscape in India.

Regards

**Rishabh Ahuja**  
**Assistant Manager - Public Policy**



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