



department for
**culture, media
and sport**

Digital Radio Switchover: what is in it for consumers?

Consumer Expert Group

Published 14 September 2010

Our aim is to improve the quality of life for all through cultural and sporting activities, support the pursuit of excellence, and champion the tourism, creative and leisure industries.

Contents

Foreword.....	5
Executive Summary	6
Summary of Recommendations.....	8
Chapter 1: Introduction	12
Chapter 2: The consumer costs and consumer benefits of digital radio ..	17
Chapter 3: Take-up.....	25
Chapter 4: Coverage.....	28
Chapter 5: Vehicles	35
Chapter 6: Accessibility.....	39
Chapter 7: Consumer information	45
Chapter 8: Consumer support and a help scheme	52
Annex A: Members of the CEG who contributed to this report.....	59
Annex B: The Consumer Expert Group and the Digital Television Switchover	60
Annex C: Consumer Power Questions for Digital Television	63

Foreword by Leen Petré

1. Despite the introduction of digital radio in the UK in 1998, analogue radio is still a key feature in many households. For many people, radio - primarily analogue radio - remains the prime source of news and information and entertainment. For others, new digital entertainment and information channels have taken a place in their lives, but daily radio listening still remains important.
2. The passion of the British public for radio is the key reason why they should be at the heart of any decisions about the future of radio. Given the importance of radio to people's lives, the Consumer Expert Group has taken the initiative to investigate the issues that a switchover to digital radio would present for consumers.
3. This resulting report to the Minister gives not only a comprehensive overview of the issues, but also a set of recommendations to resolve them. The Consumer Expert Group members have built on their experience of Digital Television Switchover to inform this report. Some of the challenges we identified will need to be addressed by government, some by broadcasters, manufacturers or the retail sector. However the responsibility for bringing all parties together to forge solutions ultimately lies with government. The Consumer Expert Group is aware that some of the issues we have identified will not be easy to address given the current economic climate, but if there is to be a government-led digital radio switchover, then the government has a responsibility for ensuring that no consumer is left behind. This report is a first step to help the government rise to this challenge.

Leen Petré

Chair

Consumer Expert Group

Executive Summary

4. This report presents the conclusions of the Consumer Expert Group (CEG), which was formed to advise Government on the Digital Television Switchover and has had its remit extended to examine the consumer issues surrounding a switchover to digital radio¹.
5. Government has recently renewed the commitment to a Digital Radio Switchover and has given its support to the criteria and target date, which were set out in the previous Government's Digital Britain White Paper². The CEG welcomes the Minister's new emphasis on "the needs and concerns of radio listeners [which] will be absolutely central to our approach to Digital Radio Switchover"³. We also welcome the Minister's decision to lessen the significance of the target date, stressing that only "if, and it is a big if, the consumer is ready we will support a 2015 switchover date"⁴. Setting a date, or a firm commitment to a date, would have had the effect of scaring consumers to switch. Clearly this would not be compatible with Government policy to support a switchover when enough listeners *voluntarily* adopt digital radio. Government's new emphasis on consumers should provide the focus to ensure consumer concerns and needs regarding digital radio are addressed, thereby reducing the barriers to voluntary take-up. We hope this report will be useful as Government makes initial steps towards this.
6. The Digital Britain White Paper set out two switchover criteria, one of which considers the extent to which consumers adopt digital radio through digital listening. Although this is a consumer based criterion, we do not consider this sufficient to protect consumer interests. This report identifies a range of consumer barriers which require further research and a more proactive approach from Government to ensure they are addressed, including coverage and reception issues and finding a solution to in-vehicle conversions.
7. The gaps in research on consumers' willingness and ability to pay for digital radio present a concerning caveat in the work towards a Digital Radio Switchover which must be addressed. We believe that improved and compelling content on digital radio will be crucial to increasing consumers' willingness to pay. Although we expect the

¹ For a list of the members of the CEG who have contributed to this report see Annex A

² See page 13, paragraphs 23-24, for an outline of the Digital Britain White Paper proposals.

³ http://www.culture.gov.uk/news/ministers_speeches/7226.aspx

⁴ Ibid

BBC to lead by example in innovating new services and content, Government must make sure the commercial sector also live up to their responsibilities in this area. If consumers are to switch to digital radio they must be compelled to do so voluntarily by the content it offers.

8. In preparation for a Digital Radio Switchover, Government must proactively ensure specific measures are put in place to protect vulnerable listeners, such as blind and partially sighted people, who rely on their radios even more than other listeners. Research shows that vulnerable listeners are the slowest to convert to new technology and as such are unlikely to be among those who voluntarily adopt digital radio before a switchover is announced. Government needs to support these listeners by providing a help scheme to assist with the costs of converting a household and providing for the development of equipment with usability features so digital radio can be made accessible to all listeners. Government should work with the CEG and other voluntary organisations to support vulnerable consumers effectively in the lead up to a switchover.
9. This report challenges the current mechanism for informing consumers about digital radio, which we are concerned does not provide the accurate and impartial advice consumers need. At this early stage in the switchover process, and with no switchover timetable in place, consumer information should communicate the benefits of digital radio and advise consumers of appropriate equipment without worrying them over a future switchover. If Government wants consumers to voluntarily adopt digital radio, any information must be balanced and, we believe, provided by a body independent of industry and its need to increase take-up.
10. Although there are different issues to be considered in a switch to digital radio than those of digital television, particularly in terms of coverage, the quantity and variety of equipment to be replaced or converted, and the environmental impact, there are important lessons to be learned from the Digital Television Switchover. The CEG has been involved in the television process from an early stage and has gained valuable experience and insights which are relevant to digital radio, as outlined in Annex B. These are reflected in a number of the recommendations and suggestions set out in this report.

Summary of recommendations

11. The Consumer Expert Group has made a number of recommendations in this report to Government, which are summarised below:

The consumer costs and consumer benefits of digital radio

- A full cost benefit analysis from a user perspective must be carried out as a matter of urgency;
- Consumer benefits need to be clear and demonstrable before an announcement for a digital switchover is made;
- A workable system for the disposing and recycling analogue radios, which consumers are likely to implement must be introduced;
- Emphasis should not be placed on driving down costs unless the sound quality and functionality of cheaper DAB sets are at least equal to analogue;
- There must be more emphasis on improving the basic usability, rather than the advanced functionality, of digital radio to encourage take-up;
- Both the BBC and the commercial sector need to offer new and compelling digital content to convince consumers to adopt digital radio;
- Research into consumers' willingness to pay and into their concerns and needs relating to digital radio needs to be carried out as a matter of urgency.

Take-up

- The take-up criterion should compare like-for-like listening platforms and measure DAB listening only;
- A digital switchover date should only be announced when no more than 30per cent of listening remains on analogue;
- The target date for a digital switchover should be revised upwards as 2015 is realistically far too early for the necessary preparations to be put in place for consumers. Any target date set should be looked upon as secondary to consumer issues such as willingness to adopt the technology, voluntary take-up and digital radio reception as an instigator for switchover;
- Measures need to be taken to introduce a more inclusive methodology for measuring take-up.

Coverage

- The fair allocation of coverage build-out costs between the BBC and the commercial sector must be made once build-out plans are agreed;
- The coverage criterion should be measured by signal strength, not just population, so that indoor and mobile reception are considered;
- The coverage criterion must be geographically weighted to ensure rural communities are not left behind;
- The switchover roadmap must include plans for DAB+;
- DAB+ compatible chips must be installed as standard to “future-proof” receivers as a matter of urgency;
- The reception time delay between receivers should be standardised.

Vehicles

- A Digital Radio Switchover date cannot be announced until DAB radios have been standard in vehicles for a minimum of 2 years, in other words by 2015 at the earliest;
- An affordable in-vehicle converter needs to be developed urgently which works with a vehicle’s external aerial, is safe, easy to fit and aesthetically pleasing;
- A switchover date cannot be announced until there is a solution to in-vehicle conversions, providing the majority of motorists with the opportunity to have a digital radio in their vehicle;
- A solution for the continuation of traffic and travel services on FM for a transitional period following digital switchover needs to be agreed;
- An accreditation scheme for dealers and other installers of retrofit digital devices must be developed.

Accessibility

- Digital switchover should not go ahead without suitable equipment being available for all listeners including older and disabled people;
- Digital radios which incorporate voice output technology must be available for blind and partially-sighted people preferably via the mainstream market or, if that is not feasible, through a channel made affordable by Government intervention, such as a help scheme;
- Appropriate information and support on the enhanced features of accessible digital radios should be available from retailers;
- Appropriate usability requirements should be included in minimum receiver specifications and a kitemarking scheme;
- The proposed integrated station guide must be consumer tested before any decision on its inclusion in devices is made.

Consumer information

- A clear and balanced public information campaign needs to be implemented through a trusted body, independent of the industry;
- Once a switchover date is announced, sales of analogue-only radio must stop;
- A post-announcement information campaign to target vulnerable groups should be developed;
- The digital tick should be adopted for digital radio and adapted as necessary ;
- A 'scorecard' should be displayed on all products to convey more information about the available features at the point of sale;
- A digital radio pre-purchase checklist should be widely available and at point of sale;
- An effective training and “accredited adviser” scheme needs to be developed for retailers;
- The CEG must be involved in the minimum specification for digital radio;
- The CEG must be involved in the design and development of any public information campaigns.

Consumer support and a help scheme

- Any Digital Radio Switchover must be accompanied by a help scheme to assist those who would find it disproportionately difficult to switch;
- The eligibility criteria of a help scheme should include people registered blind or partially sighted, those on low incomes, the over 65s and those with learning disabilities and other cognitive difficulties such as Alzheimer patients;
- A help scheme for digital radio should provide appropriate accessible equipment and include as many instructional home visits as necessary;
- A help scheme should be publicised early on in the information process on a national level and the publicity should coincide with the start of the national information campaign for a switchover;
- The CEG must be consulted in the preparation of printed material and publicity on the help and support available;
- The engagement of the voluntary sector in providing assistance with a digital radio switchover should be properly supported and funded;
- Government should ensure that charities, such as Wireless for the Blind Fund and W4B, are not undermined financially or strategically by a help scheme or any of its components, as these charities will be left with providing the ongoing of support, assistance and help people need once a help scheme has finished.

Chapter 1: Introduction

The Consumer Expert Group

12. The Consumer Expert Group was appointed in 2003 to advise Government on consumer issues relating to the Digital Television Switchover. Following the publication of the Digital Britain White Paper in June 2009, the CEG was asked to extend its role to examine how the proposals for a switchover of radio services from a predominantly analogue to a predominantly digital landscape would impact on consumers. This would include particular scrutiny of the usability and accessibility of digital radio and take-up by vulnerable consumers, including people with disabilities and older people.
13. The CEG welcomes the opportunity to advise Government at this early stage in the process, to point to the lessons of the Digital Television Switchover and to have the opportunity to ensure consumer interests are considered as the foundations are laid for the future of radio in the UK.

Scope and structure of this report

14. The CEG's terms of reference regarding digital radio are as follows:
 - To advise Government on:
 - the issues arising for consumers of the implementation of the Digital Radio Switchover programme;
 - the ways of communicating the principles and impact of the Digital Radio Switchover, including the timetable, to consumers
 - To write any reports that are deemed necessary to fulfil this remit.
 - Government will give due consideration to and respond to the reports and other advice received from the Consumer Expert Group.

15. This report was not requested by Government but the CEG have taken the initiative to attain a thorough understanding of the consumer issues surrounding digital radio and bring them to the Government's attention as preliminary policy decisions are made.
16. The CEG have taken evidence from a range of industry and Government stakeholders and used our own insights from our work and organisations. This process has reinforced our view that there is a significant lack of consumer research into digital radio. This report in no way replaces the need for such research but rather it serves to highlight the issues and make recommendations on areas for further investigation, consideration and action.
17. The CEG have identified seven key themes which we address individually in the following chapters:
- Chapter 2 examines the need for a full cost benefit analysis, particularly into the impact on consumers;
 - Chapters 3 and 4 deal with the switchover criteria for digital take-up and coverage;
 - Chapters 5 and 6 address the technical challenges to in-vehicle conversions and accessible digital equipment;
 - Chapters 7 and 8 are concerned with the information and support available to consumers.

The context of digital radio policy

18. Radio holds a special place in listeners' hearts. "Radio's appeal to the listener is that it is more than simply a stream of audio: it is an intimate, portable and ambient medium; and it is a very personal medium"⁵. Radio may be one of the oldest forms of media but it has actually grown in popularity⁶ at a time when a proliferation of media is competing for our time. Over 90 per cent of the population consume in excess of 1 billion hours of radio a week. The importance of radio to the consumer must not be underestimated.
19. Digital radio broadcasting traces its beginnings back to 1998 and, although digital listening has grown steadily since then, it has grown at a slower rate than anticipated by broadcasters and manufacturers⁷. In light of this, industry has lobbied Government

⁵ DCMS and BIS (2009) *Digital Britain Final Report* p. 91

⁶ RAJAR listening figures for Q2 2010 at 46,771 million (weekly reach) up from 46,327 million in Q2 2009

⁷ Tim Gardam (2004) *Independent Review of the BBC's Digital Radio Services* stated "digital radio has been slow to take off and its success is not yet assured. It has only reached its present position thanks to commendable co-operation between the BBC and the commercial radio sector." p. 4

for a co-ordinated drive towards a predominantly digital radio landscape which is the purpose of current digital radio policy.

20. The CEG believes that the principal driver towards Digital Radio Switchover, particularly with regards to timing, has been the commercial radio sector which is suffering in a market of high fixed costs and falling revenues. Advertising revenues have decreased from £750 million in 2000 to less than £560 million, while broadcasters who have invested in digital services are paying dual-transmission fees for broadcasting on both analogue and DAB. The commercial radio sector has estimated that at present the total cost of transmission is in the range of £70 million. According to their estimates a move to a single platform would result in a saving of around £30 million per annum for the sector⁸. In spite of this, the CEG heard evidence that the Government has already put mechanisms in place in the Digital Economy Act 2010 which have improved the financial situation of the sector and, as such, we question whether a Digital Radio Switchover is necessary.

Digital Radio Working Group

21. The potential for a co-ordinated switchover was explored by the Digital Radio Working Group, which Government set up in November 2007 to examine the future of digital radio. This Group was the first to set out criteria for a Digital Radio Switchover which would reflect the extent to which consumers adopt digital radio, measured through listening figures, and would consider the existing and planned coverage of DAB services. The final report from the Digital Radio Working Group also recommended a timetable for a digital switchover to take place in 2017.
22. Consumer representatives produced a report for the Digital Radio Working Group which highlighted that a Digital Radio Switchover was industry-led and that a compelling argument needed to be made on how consumers would benefit from the platform. They recommended further research on consumers in general and into the level of the listening criterion, as well as research into the extent of ownership amongst vulnerable consumers and the accessibility needs of disabled people. They also called for a full cost benefit analysis, a help scheme, assistance for consumers requiring accessible equipment, and a kitemark or logo scheme to build consumer confidence. It is disappointing that we appear to be in the same position nearly two years on. While plans for a Digital Radio Switchover have advanced and legislation has been changed to allow a switchover to take place, the consumer proposition has stagnated and the same arguments and recommendations made to the Digital Radio Working Group remain valid.

⁸ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence*, p. 64

Digital Britain White Paper

23. In light of the Digital Radio Working Group's recommendations, the Government committed to a Digital Radio Switchover in the Digital Britain White Paper published in June 2009. The switchover criteria outlined in the White Paper are:
- 50 per cent of radio listening is to digital;
 - National radio DAB coverage is comparable to FM coverage, and local DAB reaches 90 per cent of the population and all major roads.
24. The White Paper also recognised the importance of setting a timetable in conjunction with the criteria to galvanise the industry. The White Paper went further than the Digital Radio Working Group in forecasting the criteria could be met by 2013 to trigger a digital switchover in 2015.

Digital Economy Act 2010

25. The White Paper also identified the changes needed to allow for a switchover. These included amendments to the licensing regimes for broadcasters and multiplex operators⁹ which became legislation as part of the Digital Economy Act 2010. The Act does not set out the details of a switchover, such as the criteria or timetable. However, it facilitates a switchover by allowing the Secretary of State to nominate a date and ensuring that Ofcom can provide for an orderly changeover on that date with powers to terminate analogue licences and vary multiplex licences to deliver the coverage and sound quality needed for a switchover.
26. The radio provisions inspired debate in the House of Lords around the switchover criteria, the impact on local stations, vehicles, the environment and the potential for a Digital Radio Helpscheme. However, the provisions had broad support across all parties and were ultimately rushed through the Commons and onto statute.

House of Lords Report on Digital Switchover

27. The 2010 Act did however bring attention to the proposals for a Digital Radio Switchover. The House of Lords Communications Committee decided to carry out a short inquiry into the subject during the passage of the legislation through Parliament.
28. Individuals from the CEG representing their own consumer organisations had the opportunity to give evidence to the Committee and the CEG as a whole welcomed the findings of the Report. The Report is well-researched and comprehensive and brings to light a number of the pertinent issues surrounding digital radio. The over-arching

⁹ A multiplex consists of a number of DAB radio stations bundled together to be transmitted digitally on a single frequency in a given transmission area. The maximum number of stations carried on one multiplex is generally about ten radio services in total (although there is also capacity for data services which take up much less room on a multiplex than a radio service).

message of the Report is the lack of information available to the public. The Committee recommended “an early and extensive information campaign”, requiring that “advice goes to retailers and the public”, and that Government and the radio industry “agree advice to consumers about purchase of digital equipment” and introduce a kitemarking scheme¹⁰. The CEG agrees with these findings and will explore the case for a public information campaign in chapter 7. The Committee also recommended a Digital Radio Helpscheme, which we will discuss further in chapter 8.

Digital Radio Action Plan

29. With the new Government’s commitment to Digital Radio Switchover, an Action Plan was published by the Minister on 8 July 2010. The tasks set out in the Plan will ensure the Government has an answer to the issues and questions that have arisen since the proposals for a digital switchover began their course with the Digital Radio Working Group. We believe it also shows Government has learned the lessons from the Digital Television Switchover in order to produce a comprehensive plan to enable Government to make a fully-informed decision on switchover when the time is right.
30. The CEG welcomes the emphasis the Government has placed on the consumer in publishing the Action Plan. We look forward to working with the Minister as the switchover programme takes shape and to assisting him in ensuring the consumer remains at the heart of any decisions. We agree with the Digital Radio Action Plan “that any transition from analogue to digital radio must be consumer-led”¹¹.
31. The Plan includes tasks which will tackle a number of the recommendations this report makes. We welcome Government’s commitment to a full impact assessment including cost benefit analysis. We urge that the issues we raise on consumer costs and benefits in chapter 2 be taken into account. We also appreciate the work strands to investigate the case for a help scheme, to consider accessibility issues surrounding digital equipment and to develop communications strategies and a kitemarking scheme. Again we urge that the recommendations we make on these subjects are considered and, given the consumer focus of these areas, that the CEG is included in the groups which carry out these work strands.
32. As momentum towards Digital Radio Switchover continues, it is important that the consumer voice is heard and is a top-level consideration in decision-making. The CEG played a key role in the Digital Television Switchover. We believe that the consumer benefits are less discernible for radio than television and consumer opposition has so far been more vocal for radio. As such, the involvement of consumer representatives in the development of digital radio policy is fundamental. This report is a first step towards that.

¹⁰ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK* pp. 46-47

¹¹ DCMS and BIS (2010) *Digital Radio Action Plan*, p. 1

Chapter 2: The consumer costs and consumer benefits of digital radio

Introduction

33. Despite the commitments made to a Digital Radio Switchover, the costs and benefits of such a switchover are surprisingly unknown. Consumer groups expressed concerns to the Digital Radio Working Group regarding the cost to all consumers of converting to digital radio, and more particularly for older people, disabled people and low-income groups, and urged “extreme caution ... should the uptake in these groups be found to be low or should the costs be considered prohibitive”¹². This needs to be investigated as part of a full cost benefit analysis (CBA). The Consumer Expert Group (CEG) would have recommended that no decision on a switchover to digital radio should be made without a full CBA and as such we welcome the commitment to a full CBA in the Digital Radio Action Plan.
34. The partial CBA, carried out as part of the work of the Digital Radio Working Group, went some way to estimating the costs for industry in terms of coverage and marketing. However, it contains serious caveats regarding the costs consumers will incur. Although the partial CBA does not reflect current digital radio policy, we hope the full CBA for the Action Plan will draw lessons from the conclusions of the partial CBA, not least of which was the lack of evidence into consumers’ willingness to pay. We also urge that the full CBA will consider the issues we raise in this chapter.

Consumer costs

Affordability

35. The costs of conversion to digital radio are currently high with DAB portable radios retailing on average for £55.50, compared to £17.40 for analogue equivalents. Even with clock radios, the average price of a DAB version is nearly three times that of

¹² Consumer Impact Group (2008) *Report to the DRWG* p. 7

analogue¹³. The CEG was advised that the higher price bracket for DAB devices will not fall significantly until there is an international market for digital receivers, which is unlikely in the short-term. Given that the average household uses 2-3 radios on a regular basis¹⁴, the costs of household conversion may be prohibitive for some consumers and as such remains a considerable barrier to the adoption of digital radio.

36. The “set-top box” solution, which provided a means to convert existing analogue televisions to digital at a much lower cost than replacing equipment, is unlikely to prove a viable option for most radios. The price differentiation between a digital radio converter and an individual portable digital radio would be minimal as the only saving are the speakers.
37. However a set top box option may appeal to consumers who don't want to replace their entire stereo system or hi-fi in order to receive digital radio. Therefore, we urge manufacturers to look into the technology to this end. We also consider there to be a role for converters as a single device which will broadcast digital signals to multiple analogue sets in a household. We believe this would substantially lower the cost of conversion for households with large numbers of radio sets.

Cost v quality

38. In recent months, there has been increasing support for sub-£20 digital radio sets. The CEG questions the importance of this ambition. Lower priced digital sets tend to come with lower sound quality and less functionality, both of which are cited as consumer benefits of digital radio. Rather than providing for a digital radio ‘upgrade’, such strategies will result in consumers ‘downgrading’ their listening experience by trading in good quality analogue radios for bottom of the range digital versions.
39. In determining the case for a Digital Radio Switchover, we urge Government not to place the emphasis on sub-£20 sets to meet the needs of all listeners, particularly given their poor usability.

¹³ Research provided by GfK on sales in Q1 2010

¹⁴ Ofcom (2008) *Digital Radio – Omnibus Results* show that the average UK household has 1.2 hi-fi music systems with a radio, 0.8 radio sets and 0.7 clock radios. British Wireless for the Blind Fund (2010) *Report on attitudes and opinions from blind and partially sighted people into the digital switchover* found that respondents had “on average up to two sets in the house” p. 3. Additionally, research for the RNIB found that 87per cent of the blind and partially sighted sample owned three or more radios compared with 48per cent of the nationally representative sample. Freeman, J, Lessiter, J and Ferrari, E. (2008) *Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio*, p. 46.

Additional needs

40. As we examine in chapter 6, more accessible digital radio sets which meet the particular needs of disabled people retail for at least twice the price of standard digital radio sets. The partial CBA also identified the need for home visits to provide practical assistance to other vulnerable groups, such as older people. These are estimated at between £60 and £90 a time¹⁵. Further research needs to be carried out into the extra costs incurred by vulnerable consumers to convert to digital radio and the prospects for assistance.

Ongoing costs

41. The digital television switchover has resulted in the need for long-term support from charities when problems occur post-switchover and once dedicated switchover support has left a given area. Help for retuning and resetting digital sets has been requested up to six months after switchover¹⁶ and there will potentially be problems for the coming years. Providing ongoing assistance entails significant costs for charities and it must not be assumed that the same services will be provided for any future Digital Radio Switchover. In this time of economic restraint, charities are already experiencing a squeeze on their budgets and cannot be expected to pay for gaps in the support provided by Government and the radio industry. Government must work closely with charities and consumer groups in the lead-up to a digital switchover to ensure ongoing assistance can be provided through the most appropriate means, and also to ensure charities and consumer groups do not incur disproportionate costs.

Environmental costs

42. There is a clear public perception that digital radios consume more energy than analogue equivalents. Consumers with early sets regularly complained of their short battery life. However, leading manufacturers are increasingly giving priority to improving the energy efficiency of their sets. Digital radios are now broadly similar to their analogue equivalents in terms of energy consumption. Recent research shows that the power consumption of current DAB models is 28 per cent lower than older DAB models and they use on average only 0.38W more than current analogue equivalents¹⁷. Although the energy efficiency of DAB sets is clearly improving, developments in this area will not keep pace with the demands of more sophisticated digital functionality and DAB sets are unlikely to achieve parity with analogue sets when it comes to energy consumption.

¹⁵ PricewaterhouseCoopers (2009) *Cost Benefit Analysis of Digital Radio Migration* p. 46

¹⁶ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK: Evidence*, Memorandum by W4B – The TV and Radio Charity p. 121

¹⁷ Intertek (2010) *Research Study of Energy Consumption of Digital Radio Upgrade – Phase 1* p. 5

43. The CEG is particularly concerned by the potential disposal of millions of obsolete analogue sets following the announcement of a Digital Radio Switchover. Although the disposal of these radios must comply with the same European Waste Electrical and Electronic Equipment (WEEE) regulations¹⁸ as the digital television switchover, consumer behaviour towards the disposal of small WEEE items such as radios is likely to be very different. While consumers are likely to require help in disposing of their televisions, making it easier to intercept for re-use or recycling, radios are very easy to dispose of with the general waste.
44. In accordance with the WEEE regulations, consumers may return their obsolete equipment to retailers when purchasing equivalent equipment or use the retailer's designated collection facilities¹⁹. However, the responsibility of retailers in the disposal of devices is not well understood. Retailers like Comet and John Lewis pay into a WEEE scheme and therefore are not obliged to accept WEEE in-store. Consumers would have to dispose of WEEE elsewhere, for example at a local recycling site. It must not be assumed that consumers will know where to take their obsolete equipment or whether their local retailer will accept it. The additional inconvenience of taking equipment to designated collection facilities, which may not even have pedestrian access, will no doubt further dissuade consumers from recycling their analogue radios. Clear guidance must be provided to consumers and to retailers to ensure the regulations are appropriately applied and followed.
45. There is the possibility that consumers, familiar with local council recycling points, might be more prepared to use these areas to recycle their analogue radios. However, we consider this to be highly unlikely. Research into consumer behaviour towards recycling light bulbs shows that, even among those consumers who consciously choose to buy energy saving light bulbs, 2 in every 3 threw them in the bin when they stopped working²⁰. Government needs to be prepared for a similar pattern emerging with analogue radios. We believe that the majority of consumers will ignore the guidance and opportunities to recycle and choose to throw their analogue radios away with the rubbish. This would have a significant environmental impact. Government, local authorities and the radio industry must give serious consideration to this issue and develop initiatives and schemes to incentivise consumers to recycle. Such schemes need to cater for all consumers, including disabled people, people who are housebound or without their own transport.

¹⁸ These regulations ensure that manufacturers and retailers play their part in the reuse, recycling and recovery of their products.

¹⁹ More information on retailers and WEEE responsibilities is available at: <http://www.netregs.gov.uk/netregs/topics/WEEE/63053.aspx>

²⁰ Survey by Which? of 1030 members of the general public in Great Britain carried out face-to-face from 11th to 15th November 2009.

Consumer benefits

46. Although there were clear consumer benefits associated with the Digital Television Switchover programme which contributed to the high take-up of digital televisions, from the increased choice of channels to the improved picture quality. The CEG believes that the case is not as compelling for radio. There already exist an extensive range of radio stations on analogue and consumers have indicated that they are happy with the choice of stations available²¹. In addition to this, the AM/FM spectrum, which the Government has proposed will be vacated as part of a switchover, is not considered economically valuable and was only a small consideration in the calculations of the partial CBA.
47. The House of Lords Communications Committee report into digital switchover is illustrative of the lack of consensus on the benefits and rationale for digital radio. A range of reasons for a digital switchover were given by the radio industry but the Committee failed to identify any consumer benefits²².

Questionable functionality

48. Defining the benefits of digital radio to consumers is problematic. The most common benefits cited by the sector of increased functionality and the visual interface can be a hindrance for certain groups, such as blind and partially-sighted people, people with dyslexia or with dexterity problems. There is an 'in-built tension between "usability" and the drive for more sophisticated functionality of digital devices'²³. As explained in chapter 6, only with accessible features can the functionality of digital radio be appreciated by all listeners.
49. Many listeners do not understand and are not interested in the advanced features of DAB²⁴. It is also likely that the drive to produce cheaper DAB sets, particularly in the £20-25 price range suggested in the partial CBA, will be at the expense of advanced features. It is therefore questionable how many DAB listeners will have sets which include advanced functionality and, consequently, how much this functionality should be promoted as a general benefit of digital radio.

Content deficit

50. It is our view that improving digital content is one of the biggest challenges to the future growth of digital radio. In the context of the Digital Television Switchover, new

²¹ Ofcom (2009) *Communications Market Report* p. 193

²² House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK* pp. 28-30

²³ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK: Evidence Memorandum* by Consumer Focus, p. 118

²⁴ Ofcom (2010) *UK Adults' Media Literacy* pp.36-7

content was a key driver for take-up and the CEG considers it will similarly be fundamental in driving take-up to meet the criteria for a switchover to digital radio. Recent Ofcom research shows that consumers who have not yet acquired a DAB digital radio set consider there to be no need (55 per cent) or are happy with the existing services (32 per cent)²⁵. There is therefore much work to be done before consumers are convinced by the content offered on digital radio.

51. Digital radio content is an area in which broadcasters have given us unconvincing assurances and suggestions with no clear roadmap. While the BBC talk of the importance of “pushing the power of exclusive digital content”²⁶ to drive listeners to adopt digital radio, the proposals in their Strategy Review²⁷ to close two of their digital-only stations sent a very different message to listeners. The CEG welcomes the BBC Trust’s decision to save 6Music. The station is a clear example of how the digital radio platform offers listeners more choice and services which target niche markets. The backlash to the proposals to close 6Music demonstrates that unique content on digital can be successful and can find a passionate audience. The commercial radio sector has added to the digital offering with stations such as Jazz FM, FunKids and Planet Rock. As recent Ofcom research shows “a number of digital-only stations’ audiences have continued to grow over the past year, and five of the most popular digital-only stations were drawing weekly audiences of over a million by Q1 2010”²⁸. Of the top ten digital-only stations, five are BBC services. However, more compelling content needs to be provided if listeners are to voluntarily adopt digital radio and this cannot be left exclusively to the BBC.
52. The editorial changes the BBC are making to their digital portfolio should help persuade listeners to adopt digital radio through content linked to programmes they already enjoy. The initiative to rename Radio 7 to Radio 4 Extra will allow the BBC to offer Radio 4 shows in advance or interviews with stars on its sister station which could attract more listeners. This proved a persuasive technique for accelerating the take-up of digital television. It is important that this technique can demonstrate the added benefits of digital content to listeners without resorting to moving services entirely to a digital platform. Commercial operators should also look to expanding their digital content in a similar way.
53. The RadioCentre response to the BBC’s Strategy Review proposes “more popular [BBC] content to be broadcast on a digital-only platform, or substantially in advance of analogue broadcast”²⁹. We disagree with this argument. Listeners should be convinced to adopt digital radio through compelling content, not bullied to do so to

²⁵ Ofcom (2010) *The Communications Market Digital Progress Report: Digital Radio July 2010* p. 19

²⁶ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK: Evidence* p. 106

²⁷ BBC (2010) *Putting Quality First – The BBC and public space* included proposals to close of 6 Music and the Asian Network.

²⁸ Ofcom (2010) *The Communications Market Digital Progress Report: Digital Radio July 2010* p. 11

²⁹ RadioCentre (2010) *Putting Listeners First: The BBC’s Responsibility to Radio* p.25

maintain access to the programmes they enjoy on analogue. Although RadioCentre is correct in looking to the BBC for leadership in improving the digital offering, this should not be used as an excuse for the commercial sector to delay developing new content themselves.

Community radio

54. The only clear consumer benefit the CEG have found is the potential for growth in the small local and community radio sectors remaining on FM. The extra capacity on FM, following a migration of the majority of stations onto DAB, would allow small local stations to improve the sound quality of their services and for more community radio stations to be launched. Community radio must deliver social gain and their growth will provide a clear social benefit for consumers and communities. However, we are mindful that only a minority of listeners make use of community radio and hence will benefit from this proposal. The vast majority of listeners will merely migrate to digital to listen to the national, regional and large local stations they already listen to.

Consumer research

55. Research into consumers and digital radio is significantly lacking. When the CEG produced their first report into the Digital Television Switchover in 2004, they referred to a growing body of evidence on consumer concerns and needs relating to digital television³⁰. The picture is very different for digital radio and we have had to rely on research and insights from our own organisations.
56. The gaps in consumer research were further evident in the partial CBA which had to rely on outdated research and assumptions, and underlined that “no primary research, such as willingness to pay studies, has been conducted”³¹. Mirroring the advice in the partial CBA, we recommend that new studies are carried out into consumers’ willingness to pay as well as into their needs relating to digital radio equipment.

³⁰ Consumer Expert Group (2004) *Persuasion or Compulsion? Consumers and analogue switch-off*, pp. 53-61

³¹ PricewaterhouseCoopers (2009) *Cost Benefit Analysis of Digital Radio Migration* p. 5

Summary of Recommendations

- A full cost benefit analysis from a user perspective must be carried out as a matter of urgency;
- Consumer benefits need to be clear and demonstrable before an announcement for a digital switchover is made;
- A workable system for the disposing and recycling analogue radios, which consumers are likely to implement must be introduced;
- Emphasis should not be placed on driving down costs unless the sound quality and functionality of cheaper DAB sets are at least equal to analogue;
- There must be more emphasis on improving the basic usability, rather than the advanced functionality, of digital radio to encourage take-up;
- Both the BBC and the commercial sector need to offer new and compelling digital content to convince consumers to adopt digital radio;
- Research into consumers' willingness to pay and into their concerns and needs relating to digital radio needs to be carried out as a matter of urgency.

Chapter 3: Take-up

Introduction

57. The extent to which consumers adopt digital radio was a central concern to Government in the development of the take-up criteria, which requires that digital listening account for 50 per cent of all radio listening before any date for a digital switchover can be nominated. The principle that a firm timetable will only be determined once the majority of consumers have embraced digital radio, provides protection to listeners and legitimacy to Government policy. However, the Consumer Expert Group (CEG) believes the 50 per cent of listening criteria to be too low and, as explained to the Digital Radio Working Group, risks 'disproportionately affect[ing] disadvantaged groups who are less likely to be represented in the first 50 per cent to take up digital radio'³².

	Quarter 2 2009	Quarter 2 2010
Digital Listening	21.1 per cent	24.6 per cent
Digital Devices Sold	9.3 million	11.1 million
Household Penetration	33.0 per cent	35.3 per cent

58. Take-up of digital radio has progressed more slowly than predicted in a range of forecasts³³. These figures show that take-up is not on track to meet the migration criterion within the proposed timetable for 2015, particularly given DAB radios will not be fitted as standard across the car industry until 2013. The CEG is concerned that aggressive marketing will be employed to accelerate take-up, with the consequence of causing consumer confusion and alienating disadvantaged groups. The CEG has serious questions about the representative nature of the take-up criterion and, in this context, how listening is measured.

³² Consumer Impact Group (2008) *Report to the Digital Radio Working Group* p. 1

³³ DCMS and BIS (2009) *Digital Britain Final Report*, p.93 and Digital One and DRDB (2006) *DAB Digital Radio Forecast 2006 – 2010* p. 3

Take-up criteria

59. The CEG's position regarding the take-up criterion is two-fold. We welcome the decision to base the criterion on listening and not the take-up of digital radio devices. As the above table shows, the number of households with access to DAB is significantly higher than digital listening. To rely on household penetration would ignore the fact that listeners need to convert a number of receivers in their homes as well as their cars. It is important that the take-up criterion reflects this. However, we are concerned that the criterion includes all digital listening, not just DAB. Although we believe the internet and digital television have a role to play in the future of radio, it will be a complementary one. The Digital Radio Switchover will be a like-for-like switch from FM as the dominant broadcast platform to DAB as the dominant platform and the listening criterion should reflect that by measuring listening to DAB rather than all digital platforms.
60. In addition to this, the CEG does not believe that the 50 per cent criterion is a representative target. Reaching those not included in the first 50 per cent of listening will be a more difficult task than meeting the 50 per cent criterion. Given the slow speed of take-up so far, it is impractical to expect the remaining 50 per cent to convert to digital radio in a two year lead period. If there are no vulnerable groups included in the first 50 per cent of listening, then that is not representative and therefore not credible. We are concerned that vulnerable listeners will be subjected to a marketing strategy to "bully" them into adopting digital radio in the two years between an announcement and a switchover. This would risk considerable consumer resentment.
61. A higher take-up criterion would also fit better with Government's policy for a consumer-led switchover to digital radio. As the Minister stated at the launch of the Digital Radio Action Plan on 8 July 2010 "the needs and concerns of radio listeners will be absolutely central to our approach to Digital Radio Switchover. So we will not switchover until the vast majority of listeners have voluntarily adopted digital radio over analogue"³⁴. The 50 per cent of listening criterion is a simple majority, not a vast majority. The CEG recommends that the criterion be raised to require that no more than 30 per cent of all listening remain on analogue when a switchover date is announced. We also advise that the target 'switchover' date be set later than 2015 to allow for preparations to be put in place for consumers, including a public communications strategy, a help scheme and an affordable in-car solution.

Measuring take-up

62. Radio listening is measured by RAJAR, the Radio Joint Audience Research company set up and funded by the BBC and RadioCentre. RAJAR collects its listening data by carrying out sweep surveys. This methodology achieves what it has been designed for in providing the BBC and commercial radio with average audience figures and,

³⁴ http://www.culture.gov.uk/news/ministers_speeches/7226.aspx

although the CEG has questions around the suitability of this measuring methodology for informing government policy, we recognise that it is applied well by the organisation for its originally intended purposes.

63. RAJAR's analysis of listening by disability shows that those with disabilities such as difficulty hearing or seeing are just as likely or more likely to listen to digital radio or DAB as the general population. This finding is contrary to what members of the CEG have found in the context of their own organisations and raises questions regarding the reliability of the listening figures when it comes to smaller subsets of the population. Surveying 2000 people a week is a tiny sample of the 46.5 million radio listeners³⁵ and the recruitment of participants through fixed addresses is not conducive to representing people in care homes, homeless or isolated people, and disabled people. We also question the practicality of a paper diary for blind or partially sighted people. If these listening figures are to be used to determine a digital switchover date, all groups of listeners must be appropriately represented. We therefore recommend that a more representative methodology is used to measure listening against the take-up criterion.
64. The CEG is also concerned by the potential for listening figures to be skewed when DAB is fitted as standard in new cars and in mobile phones and MP3 players. Recent market surveys show that the current level of adoption of DAB in vehicles and mobile devices is limited. Once DAB becomes the norm for in-vehicle and mobile radio devices, we can assume there will be a sudden and marked increase in DAB listening and take-up. This will distort listening figures away from those who choose to adopt digital radio as opposed to those who have it 'thrust' upon them. The figures would also be less inclusive of groups who listen to radios in the home. As decision-makers are using these listening figures as a trigger for a Digital Radio Switchover, the 50 per cent must be as representative of the population as possible. To measure this, a more reliable and representative methodology is required.

Summary of recommendations

- The take-up criterion should compare like-for-like listening platforms and as such measure DAB listening only;
- A digital switchover date should only be announced when no more than 30per cent of listening remains on analogue;
- The target date for a switchover to digital should be revised upwards as 2015 is realistically far too early for the necessary preparations to be put in place for consumers. Any target date set should be looked upon as secondary to consumer issues such as willingness to adopt the technology, voluntary take-up and digital radio reception as an instigator for switchover;
- Measures need to be taken to introduce a more inclusive methodology for measuring take-up.

³⁵ http://www.rajar.co.uk/listening/quarterly_listening.php

Chapter 4: Coverage

Introduction

65. The importance of improving DAB coverage cannot be overstated. As the House of Lords Communications Committee stated “improved coverage is required for the achievement of all other objectives. Improved coverage will encourage more digital listening, more purchases of digital receivers, greater advertising revenues generated by digital stations, and more investment in digital content”³⁶. It is also essential to ensure consumers have access to digital services and that no groups are left disenfranchised should analogue services be switched off.
66. The migration criteria set out in the Digital Britain White Paper require that national DAB coverage be comparable to FM coverage, and local DAB reach 90 per cent of the population and all major roads before a date for a digital switchover can be set. The intention is that DAB coverage should be equivalent to FM by the time services migrate to digital. This target mirrors that set for the television switchover. However, we believe the challenges of meeting this target are greater in radio. While televisions are fixed in homes and attached to an external aerial, many radios are mobile and reliable signals must be received anywhere, including inside buildings and in vehicles.
67. The Consumer Expert Group (CEG) is concerned that the local DAB coverage criterion does not take account of the varying levels of coverage across the nations and regions, and could potentially trigger a switchover which could leave consumers in hard-to-reach areas without access to radio services. We are also concerned that the variable signal strength of DAB, and the resulting poor reception quality both indoor and outdoor, are preventing some consumers within coverage from receiving a high quality signal, and sound quality for a number of digital services that is equivalent to FM.

Coverage build-out

68. Coverage is not just a matter of DAB matching FM; this would only give a partial picture. Mobile and indoor reception must be addressed to ensure a good DAB signal

³⁶ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK* p. 36

can be received in-vehicles and within a building, not just on the window-sill. To this end, the coverage criterion should be amended to include signal strength.

69. Government has asked Ofcom to form a Coverage and Spectrum Planning Group to make recommendations on building out DAB coverage to FM equivalence. This work will include defining current coverage of national and local radio on FM; the changes to the current multiplex structure and frequency allocation; and the new infrastructure needed so that DAB can match FM. The resulting model for coverage build-out will be complete by mid-2011. It is widely recognised that the final areas of coverage build-out are more complicated and require more transmitters than the first 90 per cent of the network. Should this work only begin in late 2011, the likelihood of the 2015 target date for UK wide digital migration is questionable.
70. The House of Lords Communications Committee expressed concern about the funding of DAB coverage build-out. The commercial radio sector have maintained that they will fund build-out to a point that is commercially viable, following which the BBC will need to bear significant costs to meet their Charter obligations for universal access. Once the Coverage and Spectrum Planning Group agree a plan for DAB coverage build-out, the Government, the BBC and commercial radio can agree the allocation of costs for the build-out. We are concerned that the BBC will shoulder the majority of the costs which will be passed on to listeners through the licence-fee or via cuts in BBC content. A decision on funding the DAB coverage build-out must be decided as soon as a build-out plan is agreed, and the commercial sector must bear their share of the costs.

Geographical coverage

71. There is a potential geographical issue from varying levels of DAB coverage across the UK nations and regions. DAB coverage tends to be poor in parts of Scotland, Wales and Northern Ireland, as the table below demonstrates³⁷.

		UK	England	Scotland	Wales	N. Ireland
BBC National DAB Multiplex	Mobile	92.2	94.1	85.6	73.6	87.6
	Indoor	82.2	83.7	77.8	63.3	78.0
National Commercial DAB Multiplex	Mobile	92.6	94.7	84.0	82.2	86.9
	Indoor	81.6	83.4	76.2	73.5	79.7

72. Additionally, DAB set penetration varies across the nations and regions, “from 30 per cent in the North West of England to 13 per cent in Northern Ireland” and is higher in

³⁷ Digital Radio Working Group (2008) *FM and DAB Radio Coverage in the UK*

urban areas (22 per cent) than in rural³⁸. This represents an “acute distributional issue”³⁹ which will leave some regions playing catch-up in terms of DAB coverage and take-up. This must be taken into account when measuring coverage. There is a danger that using national averages to trigger a switchover may disguise considerable inequalities and may disenfranchise communities in rural areas.

73. There are a number of barriers which rural consumers face when it comes to a Digital Radio Switchover. These range from rural incomes, which are typically lower than average, poor DAB coverage (if covered at all), topographical factors which affect digital reception and less choice of services. Given the technical challenges of extending coverage into rural areas, it is likely that rural consumers will not receive DAB coverage until switchover takes place and that access to information and advice on switchover may be more limited. This puts rural consumers, and especially those in Scotland, Wales and Northern Ireland, in a particularly disadvantaged position.
74. The CEG is concerned that the Government, in building out DAB coverage, may recommend quick wins from improving urban coverage and signal strengths in highly populated areas already covered by DAB. This would be to the detriment of rural communities which, as many are now without DAB coverage, should be a priority in the plans for coverage build-out. To ensure such communities are not left behind, we recommend that the coverage criterion be geographically weighted rather than a national average.

Coverage infrastructure

75. Arguments have been made for a number of broadcast technologies for radio. The evidence presented to the CEG showed that, provided the funding is available, any infrastructure or combination of infrastructures is technically feasible.

FM networks

76. The limitations of national, as distinct from local, FM infrastructure are often quoted as part of the rationale for a migration to DAB. It is argued that the national FM infrastructure is aging and would require substantial investment to continue beyond 2030. We heard evidence that this investment has been estimated to be around £100 million, slightly more than the investment needed to build-out the DAB infrastructure. Government and broadcasters have argued that this investment would be better made in digital as something new which can offer more choice to listeners and business opportunities to broadcasters, than in the “do nothing” option of continuing with FM.

³⁸ PricewaterhouseCoopers (2009) *Cost Benefit Analysis of Digital Radio Migration* p. 60

³⁹ Ibid

77. However, evidence given to the CEG shows that there are no economic or technical barriers to FM continuing as a broadcast platform. As the levels of investment required for continuing on FM or moving to a DAB platform are so similar, the difference financially between either course of action would be minimal. There is also no obstacle to a mixed ecology in radio as there was in television, as both FM and DAB can continue in parallel without causing interference to each other. Once the national, regional and large local analogue networks are decommissioned, local FM networks can continue to run alongside DAB without the need for substantial investment, as most local broadcasters can maintain their own small antennas for a modest investment. The aging and expensive FM infrastructure argument would appear to be a myth and the continuation of FM as the dominant broadcast platform or as running alongside a digital platform are both feasible technically and financially from an infrastructure point of view.

DAB+

78. The principal argument opposing a move to DAB+ recognises the 11 million DAB radio sets which have been sold to date, the majority of which are only compatible with DAB and FM. Being that these figures represent over a decade's worth of sales, the CEG questions how many of these 11 million DAB sets are actually being used and therefore how robust this argument is. There are clear benefits to DAB+ and the other advanced digital technologies being launched across Europe⁴⁰. The additional capacity these technologies offer would allow broadcasters to improve the sound quality of their stations and provide more data services. As DAB+, for example, offers capacity for more services on a multiplex, the transmission fees for each multiplex are divided among more broadcasters. This would provide the "ultra-local" stations remaining on FM with a means to move to digital at a reduced rate.

79. A future technology change to DAB+ appears almost inevitable and technically very simple as the DAB transmission infrastructure is compatible with DAB+. It is also possible for both digital technologies to run alongside each other, allowing broadcasters to simulcast⁴¹ between the two as part of a possible switchover to the more advanced technology. The CEG recommends a move to DAB+ as soon as possible after DAB switchover, with research into a roadmap included in the Digital Radio Action Plan.

80. In the meantime, there needs to be clarity from manufacturers that multi-standard chips, capable of receiving both DAB and DAB+, will be installed as standard in all future receivers. It is also important that it is made clear to consumers which sets are and, more importantly, are not compatible with DAB+ and therefore are not entirely "future-proofed".

⁴⁰ Belgium, Denmark and Norway are running DAB services, Germany, Italy, Sweden and Switzerland broadcast on both DAB and DAB+ and France announced DMB-A as its digital standard.

⁴¹ A simulcast is a simultaneous broadcast of a service on two or more platforms.

The internet

81. Questions have also been raised regarding the potential for the internet to provide the primary platform for digital radio. We don't believe this will be possible in the short to medium term as the UK broadband infrastructure cannot support the levels of simultaneous listening which occurs at peak listening hours in the UK. In addition to which "broadcasters have learnt that it is expensive to buy and operate the servers needed to provide audio and video services – and that this cost increases in proportion to the number of simultaneous users"⁴². Broadcasters with an internet presence are paying for very small numbers of listeners to use the service. The ability of the internet to provide radio services diminishes yet further when it comes to cars. Although internet radio is simply not able to serve as many listeners as a broadcast platform like DAB can, there will be a future role for internet radio particularly for mobile devices and the Government should ensure this is investigated.

Signal strength

82. DAB coverage was originally planned for mobile reception however, as the Digital Radio Working Group pointed out, "in practice listeners mainly use DAB in a different way than it was planned for - indoors, on portable "kitchen" radio type devices"⁴³. Consequently, for many listeners DAB does not fit well with their listening habits. As mentioned previously in this chapter, DAB coverage may already reach 90 per cent of the population but it is not as reliable as FM when penetrating buildings and broadcasting in dense urban environments.
83. We are also mindful that the DAB signal must be consistently strong. When an FM signal is weak it can still be received whereas DAB will cut out. Any coverage build-out plan must tackle this through improved signal strength not only by increasing the population covered by DAB.
84. The CEG is also concerned about the time delay experienced by digital devices. This delay is not only obvious between analogue and digital receivers but also between different digital receivers and can affect the listening experience when listeners are moving between rooms and radios. The delay can be anything from 2 to 8 seconds between receivers. If the delay was standardised between receivers, the BBC could vary their broadcast of the hourly pips on Radio 4 so they reach DAB receivers on time. Manufacturers need to look into minimising or standardising the delay between models and broadcasters who are not already doing so need to look at adjusting their transmissions of time indications.

⁴² WorldDMB (September 2009) *Eureka Newsletter* p.1

⁴³ Digital Radio Working Group (2008) *FM and DAB Radio Coverage in the UK* p. 8

Indoor reception

85. Indoor reception of DAB is inconsistent as signal can be lost when passing through building walls. Poor reception can cause real difficulty for consumers who cannot move around very well and need to receive high quality sound from the moment they turn the radio on, not after they move the receiver around to find the best reception. Signal strength needs to be higher to penetrate the structure of buildings and this should form part of the considerations of the Coverage and Spectrum Planning Group in defining coverage build-out.

Mobile reception

86. Despite DAB reception being planned for mobile reception in cars, gaps in coverage have caused complaints from drivers who lose reception whilst driving around a multiplex area. Car manufacturers have committed to fit DAB as standard in all new cars from 2013. However, they recognise that any grievances drivers have with their in-vehicle radio will be directed at them rather than the broadcasters. Therefore they consider DAB coverage of the major road network to be a priority in build-out planning.
87. Currently, there are issues with drivers having to retune their DAB radios as they move between multiplex areas. Ensuring that multiplexes are configured to allow in-vehicle radios to pick up the same station as they pass through various multiplex coverage areas needs to be part of the build-out plan.

Sound quality

88. Concerns have been raised that, in accommodating more stations on a digital multiplex, the low bit rates and signal compression used for each radio station are inadequate for the high quality sound promoted as a benefit of DAB. The sound quality of Radio 3, which uses 192kbs, is generally considered a satisfactory level for DAB, however, this deteriorates when Radio 5 Live Extra is broadcast and the signal strength drops to 160kbs. There remains the possibility of a tangible loss in public value if commitments to high-quality sound are weakened.
89. For the Digital Radio Working Group, consumer groups noted that services which broadcast at lower bit-rate levels were more difficult to hear. Consumer groups called for research into the impact of bit-rate levels on hard of hearing people⁴⁴. It is vital that this research is carried out in order that the findings can be taken into account by the Coverage and Spectrum Planning Group's work into DAB coverage build-out.

⁴⁴ Consumer Impact Group (2008) *Report to the Digital Radio Working Group* p. 5

Summary of Recommendations

- The fair allocation of coverage build-out costs between the BBC and the commercial sector must be made once build-out plans are agreed;
- The coverage criterion should be measured by signal strength, not just population, so that indoor and mobile reception are considered;
- The coverage criterion must be geographically weighted to ensure that rural communities are not left behind;
- The switchover roadmap must include plans for DAB+;
- DAB+ compatible chips must be installed as standard to “future-proof” receivers as a matter of urgency;
- The reception time delay between receivers should be standardised.

Chapter 5: Vehicles

Introduction

90. The conversion of in-vehicle radios is considered one of the biggest challenges to a migration to digital radio. At present, in-vehicle digital radio listening is at only 4.1 per cent significantly lagging behind in-home at 31 per cent and at-work listening at 20 per cent⁴⁵. The comparison is even starker when viewed in terms of all radio listening, of which in-vehicle counts for 19 per cent, while DAB in-vehicle listening is only 0.8 per cent. Considering the value of drive-time listening to broadcasters in terms of audience and advertising, an analogue switch-off of the vast majority of radio services would be in no-one's interest at the present time.
91. Although the Consumer Expert Group (CEG) welcomes car manufacturers' commitment to fit DAB radios as standard in all new cars from 2013, this is too late for a digital switchover proposed to take place in 2015 and would still leave approximately 20 million cars on the road without DAB radio. Considering the long life-span of many vehicles, we believe there would be a transitional period of up to ten years following a 2015 switchover before the majority of cars had DAB radios fit as standard. The two proposed solutions of retrofitted digital radios and digital converters, which act as a "set-top box" for radios, have their upsides and downsides and both require further development and growth in the market. It is also not clear, from the experience of vehicle and device manufacturers thus far, that these solutions can be successfully developed. What is clear, however, is that consumers face potentially high costs to convert their existing car radio before a digital migration.

In-vehicle conversions

92. The CEG was assured that DAB converters would be key to in-vehicle conversions and that the market would grow. However, the availability of reliable converters is a real concern. Early converters have had problems with aerial installation, poor reception and trailing cables. These have led to a high number of returns to the point that a leading retailer stopped stocking the devices. We heard evidence that similar problems have put other manufacturers off investing further in converters.

⁴⁵ RAJAR listening figures for Q1 2010
http://www.rajar.co.uk/content.php?page=listen_market_trends

93. Many of the problems with converters stem from their connection to an internal aerial. A reliable in-vehicle solution would need to connect to an external aerial. However, such devices are not readily available and will be complicated to develop given that radio aerials differ from car to car. Device manufacturers will need to work closely with car manufacturers to find solutions which will work with most aerials.
94. The reliability of converters is also affected by their condition as a self-fit device. Suppliers of converters have begun to offer an installation service for the devices to improve performance and reduce the returns rate. A fitted solution from accessory suppliers and car dealers should be encouraged to remedy the issues with converters and improve their performance, but should not be seen as a means to simply charge the consumer more. As the market for converters grows, the cost of these devices should fall and we believe installation should be a minimal cost for the consumer.
95. The barriers to replacement DAB radios are considerable. In-vehicle radios are integrated into the dashboard and into the electronics which affect other functions of the vehicle. To complicate this further, radio systems not only vary between car makes but also between models from the same car manufacturer. This has raised concerns among manufacturers that replacement DAB radios fitted in garages outside of the dealership networks may compromise the systems within their vehicles. This is clearly a concern for consumers and further cooperation between the car industry and radio manufacturers is needed to identify the barriers to replacement DAB radios and possible remedies. Guidance must also be provided to consumers on the compatibility of replacement radios with different car makes and models.

In-vehicle functionality and safety

96. In-vehicle analogue radios have historically included much of the functionality associated with digital radio from the easy tuning and presets to the station information on-screen. It is our view that the additional on-screen functionality and interactivity digital radios can offer should not be incorporated into in-vehicle DAB radios owing to safety concerns and the potential driver distractions they would cause. Thus, it is likely that digital radios in vehicles will not differ a great deal from their analogue equivalents, which begs the question: what is the consumer benefit of in-vehicle DAB?
97. DAB converters have raised further concerns among the CEG in terms of safety, from the trailing cables between the device and the aerial, and the possibility of increased theft associated with removable devices in vehicles. The CEG is therefore concerned that in-vehicle conversions will be costly for consumers, will jeopardise the safety of vehicles and will deliver little benefit or difference to the motorist over their current analogue radio.

Role of dealers and retailers

98. The CEG considers the market for retrofitted DAB devices, be they radios or converters, to offer dealers the possibility to re-establish relationships with car owners. Dealers and retailers should see this as a market opportunity and look into means to ensure consumers are protected and provided with appropriate information. Dealers need to be able to respond to customers' queries and advise on the limitations of analogue radios in vehicles, particularly as it is likely the cost of a DAB radio as an optional extra at the point of sale would be less than a DAB radio retrofitted at a later date.
99. There is also an opportunity here for the motor trade to improve their poor reputation when it comes to customer service. Office of Fair Trading figures show that the car servicing and repair sector is consistently one of the most complained-about markets in the UK economy.⁴⁶ Research needs to be done into the possibilities for an accreditation scheme for in-vehicle digital radio installers, similar to the registered installer scheme for digital television. This would offer consumers the opportunity to convert their radios in a trusted environment and allow them to feel confident that the job is done properly. Dealers should also investigate the potential for including the installation of a DAB radio as part of the servicing regime. Considering the market that replacing radios will offer dealers, we recommend that installation be provided free of charge.

Traffic and travel services

100. There are currently two types of traffic and travel services delivered by analogue radio to drivers in the UK; traffic announcements which cut into radio listening, and live data services which send traffic data to satellite navigation systems on road closures and congestion etc. The latter is transmitted via the national and large local FM networks, the future of which is uncertain as the FM services financing these networks will migrate to DAB.
101. In anticipation of a digital migration, providers of traffic and travel services have invested in digital equivalents. However, no vehicle currently supports the technology to receive these services on DAB. Consequently, providers have raised concerns regarding the future of their businesses following a Digital Radio Switchover and the impact on motorists who will lose the live traffic data function of their satellite navigation systems.

⁴⁶ National Consumer Council (2005) *At a crossroads: getting the UK car servicing and repair sector back on track*, and 2009 Consumer Direct complaint statistics available at: http://www.consumerdirect.gov.uk/news/press_releases/national/2009/CDhalfyearcomplaint

102. The CEG recognises that the loss of live traffic data will only affect a minority of motorists who have high-end satellite navigation systems with additional functionality. Even with the loss of live traffic data, the basic functions of the satellite navigation systems affected will continue to work. We therefore consider it a minor issue among the wider concerns surrounding in-vehicle conversions to digital radio. We also don't believe it to be a problem without a potential solution but manufacturers and consumers need clarity and assurances. As Government has accepted, a digital switchover "does not necessarily mean that these services cannot continue on FM ... not least because it would provide continuity of service for motorists"⁴⁷. Providers of data services need to work with the network operator to urgently address the potential for the continuation of data services on analogue for a transitional period following a digital switchover. Work must also be done to develop the technology for receiving DAB data services in order to accelerate their introduction into satellite navigation systems and minimise the impact on motorists.

Summary of Recommendations

- A digital radio switchover date cannot be announced until DAB radios have been standard in vehicles for a minimum of 2 years, in other words by 2015 at the earliest;
- An affordable in-vehicle converter needs urgently to be developed which works with a vehicle's external aerial, is safe, easy to fit and aesthetically pleasing;
- A switchover date cannot be announced until there is a solution to in-vehicle conversions, providing the majority of motorists with the opportunity to have a digital radio in their vehicle;
- A solution for the continuation of traffic and travel services on FM for a transitional period following digital switchover needs to be agreed;
- An accreditation scheme for dealers and other installers of retrofit digital devices must be developed.

⁴⁷ House of Lords Official Report, 3 February 2010 c.266

Chapter 6: Accessibility

Introduction

103. The benefits of digital radio advocated by the radio industry and manufacturers emphasise the additional functionality and interactivity not available on analogue. This additional functionality and interactivity can be problematic for many disabled consumers who rely on radio and can be a significant barrier to take-up. This was explained during the passage of the Digital Economy Bill through Parliament, “at present, radio does not require the same level of visual interaction as other media. However, in a recent study a significant majority of blind and partially sighted people expressed concern that advanced features of digital radio sets were not accessible to them because digital sets required the use of visual interfaces”⁴⁸. The functionality and interactivity of digital radio relies on the user being able to see the screen and navigate menus on screen, this can be a challenge for radio listeners who are blind and partially sighted (with radio being the preferred pastime for 91 per cent of them⁴⁹), dyslexic, have learning disabilities or have dexterity problems. Solutions in the form of voice output technology are feasible but not currently available.
104. The findings on usability features that many representatives from within the Consumer Expert Group (CEG) fed into the Digital Radio Working Group in 2008 have so far had minimal impact on digital set design. These issues must be properly addressed prior to a decision on a migration to digital. The potential for their inclusion in mainstream receiver specifications and the associated labelling scheme, in addition to their role in a help scheme, should also be investigated to ensure no group is disproportionately disadvantaged by digital radio.

Accessibility issues

105. Research commissioned by the RNIB (Royal National Institute for Blind People) has shown “blind and partially sighted users tend to be more reliant on radio

⁴⁸ House of Lords Official Report, 3 February 2010 c.285-6

⁴⁹ Douglas et al. (2006) Network 1000. Opinions and circumstances of visually impaired people in Great Britain: report based on over 1000 interviews. University of Birmingham, Visual impairment centre for teaching and Research, School of Education.

than sighted users”⁵⁰. Yet these listeners are in danger of being excluded from digital radio unless appropriate equipment design to meet their needs is put in place. As the research also shows, the majority of these design features would benefit more than just blind and partially sighted consumers. Design considerations with regards to buttons and interfaces “should improve the user experience of digital radio equipment for all groups”⁵¹.

106. Integrating usability features into design considerations of the full range of DAB radios should ensure that digital radio is accessible to all consumers and that accessible receivers are available at all price levels. Usability features may even prove more attractive to consumers than digital radio’s advanced functions. This point was recently reinforced by an Ofcom Media Literacy Report which shows around half of listeners are not confident or interested in interactive functions⁵².
107. The usability feature unique to blind and partially sighted listeners, and important to their ability to use digital radio equipment independently, is voice output technology. Voice output technology for information on the display screen and voice output confirming button presses and function alterations puts blind and partially sighted listeners on a level playing field with sighted users of digital radio. Research has clearly indicated, when using radios without voice output technology, blind and partially sighted people are twice as likely to need help from another person as sighted people, whilst their legitimate aspiration is independent use of their radio sets⁵³.
108. Developments in the e-book and the smartphone industries indicate that voice output technology is becoming more of a mainstream feature in electronics products. Evidence has shown that DAB industry representatives fear there is no compelling business case and that the commercial and practical barriers in marketing accessible products are too large for them to overcome⁵⁴. There exists a degree of willingness on the part of manufacturers to research and develop sets to meet the requirements of blind and partially-sighted consumers. However, we have found that the perceived lack of return on that investment means they do not think the proposition currently makes commercial sense. When reporting to the Digital Radio Working Group, consumer groups noted a “need for more work to convince industry representatives to develop products that cater for the needs of blind and partially sighted people”⁵⁵. Although the UK market for these products might be limited, manufacturers should consider the potential of a global market in the long-term. However, if it is the case

⁵⁰ Freeman, J, Lessiter, J and Ferrari, E. (2008) Research Report: *Are you really listening?* The equipment needs of blind and partially sighted consumers for accessible and usable digital radio, p. 5

⁵¹ Ibid

⁵² Ofcom (2010) *UK Adults’ Media Literacy*, pp. 36-7

⁵³ Freeman, J, Lessiter, J and Ferrari, E. (2008) Research Report: *Are you really listening?* The equipment needs of blind and partially sighted consumers for accessible and usable digital radio pp. 6-7

⁵⁴ Ibid p. 7

⁵⁵ Consumer Impact Group (2008) *Report to the Digital Radio Working Group* p. 5

that accessible sets are only viable outside the constraints of commercial markets, then the only solution seems to be for Government to provide financial assistance for their development so as to bring these products to market.

Accessibility requirements

109. Research commissioned for the RNIB and recent research for the British Wireless for the Blind Fund found the priority items for accessible digital radio design to be:
- Ability to easily store and preset radio stations;
 - Button design (including tactile markings, size, groupings and spacing);
 - Physical properties of the text display (including good colour contrast and size) to make it more readable;
 - Interface software design to minimise user intervention or to maximise simplicity of user interaction and to provide intuitive processes (e.g. for autotune, rescan, scroll, play recording);
 - Portability (light in weight);
 - Multi-purpose (including CD, tape and/or memory stick/SD card technology);
 - Well built to withstand constant usage by blind and partially sighted people; and
 - Voice output (speech feedback to confirm button presses or function alternations as well as voice output reading out information on the text display.)⁵⁶
110. For listeners who are restricted in movement, the facility to have a remote control would also be an accessibility requirement. For example, should a disabled listener need to leave their radio on the window-sill for reception purposes, they would still be able to control the equipment from their bed, allowing them to utilise DAB equipment more efficiently.
111. As already mentioned, a number of these requirements are beneficial to the mainstream market and manufacturers should work to further incorporate best practice in the provision of voice output, button design, text display and interface software design into their sets. To this end, it is important that manufacturers and consumer groups are able to align their common interests during the process to decide the elements included in the minimum specifications for DAB receivers.
112. The CEG notes that leading manufacturers have already been working to find solutions to accessibility issues. PURE added voice feedback technology with voice tags to one of their popular models. Although this technology did not provide an ideal solution, it was found helpful by blind and partially sighted users. However, PURE

⁵⁶ Freeman, J, Lessiter, J, and Ferrari, E (2009) *Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio*, p. 6 and British Wireless for the Blind Fund (2010) *Report on attitudes and opinions from blind and partially sighted people into the digital switchover*, p. 5

decided to discontinue the model because they found it was not commercially viable. Roberts have built a partnership with British Wireless for the Blind Fund to provide DAB sets designed to better meet the recipient's usability requirements and with access for customers to Roberts' helpline and demonstration disks.

113. Manufacturers have indicated that fully accessible DAB sets are possible but they claim that the investment required for development coupled with the limited market, make it commercially very difficult without subsidy. The CEG question their arguments and believe that previous accessible devices have been ineffectively marketed to the mass market without differentiating the benefits of their accessible features. The market for accessible devices need not be limited. Given the direction of travel across Europe and internationally towards digital radio, we believe the market for accessible digital radios is global and potentially extremely lucrative. However, there are no quick wins for manufacturers and they would only see a return on their investment in the long-term.
114. With this in mind, RNIB has indicated their willingness to help with technical specifications by providing engineering and ergonomic expertise, but it is not willing to invest charitable funds to remedy market failure and bring a product to market. It is important that the need for accessible sets and the barriers faced by commercial operators in this area are fully recognised in the design of a help scheme.

Cost

115. It is our view that the drive for manufacturers to bring down costs and meet their commitment to sub-£20 sets by 2011⁵⁷ has been at the expense of incorporating usability features. Disabled listeners who require accessible features are at the moment limited in their choice of devices to niche and expensive products.
116. Ricability research into DAB receivers found that the product with the most accessibility features for blind and partially sighted listeners retailed at £160⁵⁸. This is a prohibitive cost for many vulnerable consumers, particularly if they need to replace a number of radios in their home. In this way the mainstream market has not been able to deliver affordable digital options for people with disabilities.
117. The availability of accessibility features in DAB receivers, the examples of DAB receivers designed specifically for vulnerable listeners, the advances in accessible television technology and the use of voice output in e-book readers and smartphones all indicate that radios with enhanced usability features are technically possible. However, the disproportionate cost for consumers and the industry perception of a lack of a mainstream market make these products an expensive venture. "As has

⁵⁷ DCMS and BIS (2009) *Digital Britain Final Report*, p. 98

⁵⁸ http://www.ricability.org.uk/consumer_reports/at_home/digital_radio

been the case for digital television switchover, it looks unlikely that accessible digital radio equipment will be produced without Government intervention to stimulate the market or to procure accessible radio sets directly⁵⁹. This should be addressed in the context of a help scheme, which will be explored further in chapter 8.

Integrated Station Guide

118. The CEG notes the proposal for an integrated station guide (ISG), which would list all the DAB and FM stations available together on the screen of a DAB receiver, allowing listeners to move seamlessly between stations and creating a level playing field between stations on DAB and those on FM.
119. Although the CEG recognises the importance of the ISG for small local and community radio stations, there is also a need for consumer feedback on the technology before it is included in any minimum receiver specifications. As manufacturers have pointed out, this prototype has not been developed in response to consumer demand and they have not previously received negative feedback on AM/FM switches on analogue radios or DAB/FM switches on DAB radios. We would urge Government and industry to ensure that the technology is tested during consumer trials of digital radio and that, if implemented, takes account of the needs of all listeners.

Information and support on accessibility

120. The CEG has found the information and support currently available to consumers in general is limited. This is even more the case for consumers with disabilities and accessibility requirements. To ensure the provision of appropriate information and support on enhanced accessibility features, retailers will require training to understand access issues, to be able to communicate with disabled consumers and demonstrate the relevant features. Disabled consumers should feel assured of the quality and features of digital devices through a clear and comprehensive kitemarking scheme which identifies not just approved standard sets but also approved accessible sets. We will examine this further in the following chapter.
121. Although the vast majority of radios, unlike digital televisions, do not require installation or tuning at home, listeners with limited familiarity with technology or limited cognitive abilities are likely to require assistance to familiarise themselves with a digital receiver and its functions. Other support mechanisms, including helplines and home visits, should be available for this purpose.

⁵⁹ House of Lords Official Report, 3 February 2010 c.286

Summary of Recommendations

- Digital switchover should not go ahead without suitable equipment available for all listeners, including older and disabled people;
- Digital radios which incorporate voice output technology must be available for blind and partially-sighted people preferably via the mainstream market or, if that is not feasible, through a channel made affordable by Government intervention, such as a help scheme;
- Appropriate information and support on the enhanced features of accessible digital radios should be available from retailers;
- Appropriate usability requirements should be included in minimum receiver specifications and a kitemarking scheme;
- The proposed integrated station guide must be consumer tested before any decision on its inclusion in minimum receiver specifications is made.

Chapter 7: Consumer information

Introduction

122. The Consumer Expert Group (CEG) feels strongly about the current lack of accurate and balanced information for consumers on digital radio. As we concluded in chapter 2, we have found no discernible benefits for the consumer in a Digital Radio Switchover. We therefore question the marketing strategies to persuade consumers to switch. Any campaign implying that switchover is imminent, or to convince consumers to throw away their analogue sets is misinforming and misleading. The CEG is concerned that consumers are being panicked into adopting digital radio rather than convinced by the digital offering.
123. The over-arching message from the House of Lords Communications Committee report was the need for “an early and extensive information campaign”⁶⁰. The CEG agrees with the Committee’s emphasis on information rather than marketing. We can learn from consumers going through the Digital Television Switchover who complained it was difficult to find independent and impartial advice⁶¹, by making sure this information gap is addressed for digital radio purchases. We believe that a kitemarking scheme for products, combined with effective labelling, is central to this, supported by retailers who provide appropriate advice to all consumers at the point of purchase.

Public information campaign

124. At present, the information available to consumers on digital radio comes predominantly via the radio industry. The radio industry set up Digital Radio UK (DRUK) at the end of 2009 to develop digital radio in the UK and to plan and manage a potential future Digital Radio Switchover. The CEG considers DRUK to be in effect an industry body acting in the commercial interests of its members. In this context we don’t expect impartial consumer information from DRUK and, for that reason, we recommend an independent public information campaign.

⁶⁰ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK*, p.42

⁶¹ Consumer Focus Scotland (2009) *Digital Diaries – Review of the Scottish Borders Digital TV Switchover*

125. It is important to recognise the different role DRUK has in comparison with Digital UK during the Digital Television Switchover. Although both organisations are funded by broadcasters, they have very different remits. Digital UK was set up following the announcement of a switchover and as such played no role in influencing the switchover decision or meeting the switchover criteria. Digital UK's role centres on promoting digital television and informing consumers on how to handle the switchover. Clearly there is a need for an equivalent body for a Digital Radio Switchover. However, until the point at which an announcement of a switchover is made, DRUK cannot provide the balanced advice consumers require as any information they provide is primarily aimed at driving digital radio take-up.
126. As a result, we have found that the marketing campaigns developed by DRUK have raised a number of concerns among consumers and consumer groups. The mixed messages contained in recent advertising have led to two misunderstandings: first, that analogue will imminently be switched off and secondly, that consumers need to go out and purchase a digital radio as a matter of urgency. The Radio Amnesty scheme is an example of this. Anecdotal evidence from Age Concern and Which? suggested that the launch of the Amnesty caused some confusion among consumers and retailers, and led many consumers to worry about changes to their listening habits and the loss of FM. On the day of the launch a local Age Concern received an influx of questions and concerns from confused consumers. And Which? received a complaint from a member whose local participating retailer knew nothing about the initiative. Another retailer pointed out that only lower priced ranges were available through the scheme. This means some consumers may have ended up with a poor deal out of the Amnesty, raising doubts about retailers' and manufacturers' commitment to promoting digital radio.
127. As the House of Lords Communications Committee pointed out, "the Government's policy on digital radio ... is anything but well known"⁶². Unless and until the clear gap in the public consciousness and understanding regarding a Digital Radio Switchover is addressed, consumers will be confused and concerned by marketing strategies and others will continue to purchase analogue devices unaware of the conversion costs they will face further down the line. A clear and balanced public information campaign is fundamental in ensuring consumers understand that analogue radio will not be turned off altogether, although they will not be able to access the same range of stations on their old set. They also need to know that although a switchover to predominantly digital radio may occur there is no need to replace their analogue sets at the moment. People who intend to buy a new radio now should be advised of their options, and what kind of set will be 'future proofed' against a possible switchover. The radio medium itself could be the main vehicle for getting balanced information out to listeners.
128. Lessons should also be learned from the Digital Television Switchover on the impact of the ongoing sales of analogue devices. Analogue televisions continued to

⁶² House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK*, p. 42

be sold following the announcement of a switchover, which caused confusion in the television market. However, an argument could be made for the ongoing use for analogue televisions for gaming and owing to the availability of “set-top boxes” for digital conversions. The sales of analogue radios may be falling in proportion to DAB receivers however, they still outsell DAB receivers by more than 3:1⁶³. We recognise that FM will continue following switchover, but believe that the small local and community stations broadcasting on that platform have a very limited listenership and, for the majority of the population, all the stations they regularly listen to will no longer be available on analogue. The availability of analogue equipment may therefore have a greater impact when it comes to radio than to television. The CEG recommends that the announcement of a switchover date coincides with an end to the sales of analogue radio sets.

Post-announcement information

129. As was the case with the Digital Television Switchover, there should be targeted information in the lead-up to a switchover for vulnerable groups, raising their awareness of the switchover and any assistance available. Vulnerable groups are slower to change to a new technology and take longer to understand the implications and costs involved. In the context of the Digital Television Switchover, a tracker system was set up to monitor their progress. The following groups were identified as rating lower in understanding of key messages and/or actual switching behaviour: young people between 16 and 24, black and ethnic minority groups, non-English speakers, people who were living alone, people over 75, and disabled people⁶⁴. Vulnerable groups must not be left behind as to lose the use of their radio would have a more profound effect on certain vulnerable groups than on the average listener. The targeted information campaign should be developed through work with local trusted agencies and should mirror and build on that of the television switchover.

Consumer checklist

130. To ensure consumers are able to make well-informed decisions at the point of purchase, the CEG devised a consumer pre-purchase checklist for the Digital Television Switchover. This consisted of brand-neutral questions on what features to consider and look for when buying a digital television product. They “help consumers,

⁶³ Market research provided by GfK on sales of analogue and DAB receivers in 2009

⁶⁴ Digital UK (Q2 2006) *Tracker Results: The Dashboard by consumer group*. Note that people in flats and in rented accommodation also scored lower than average, but as radio does not require the same communal infrastructure as TV, we do not expect these groups to have problems defined by their housing situation.

in particular those with special needs, choose equipment that fully meets their needs”⁶⁵. These questions are attached in Annex C.

131. A similar pre-purchase consumer checklist should also be developed for digital radio. We would expect the questions to be widely available in advance of purchase and at the point of sale. The checklist should also be included in the material provided as part of an information campaign on switching to digital radio. We also suggest that providing a consumer pre-purchase checklist and advice be a requirement of any “accredited digital radio retailer”.

Terminology

132. Since its inception, the process for a Digital Radio Switchover has taken on a number of guises. The Digital Radio Working Group referred to it as a ‘digital migration’, the Digital Britain White Paper preferred ‘upgrade’, and the Digital Economy Act 2010 legislates for a ‘switchover’.
133. It is important for consumer understanding and confidence that one term is used consistently and it is helpful to use a term that consumers are familiar with. We welcome Government’s decision to use the term Digital Radio Switchover since this would have been one of our recommendations. It has clear associations with a move from analogue to digital broadcasting at a set point in the future.

Labelling Scheme

134. The CEG welcomes the work that has already begun to agree a set of minimum receiver specifications for digital radio together with a rigorous testing and enforcement regime. Once these are agreed and implemented, they will underpin a kitemarking scheme and help consumers to make more informed choices when purchasing digital devices. We encourage consumer representation through CEG involvement in defining minimum specifications to ensure consumer needs are taken into account.

Digital tick

135. In the television switchover, the digital tick has been pivotal to consumer confidence and providing assurance on the compatibility of a range of products with switchover. It is a “striking and simple logo used ... across products, services and

⁶⁵ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence* Supplementary memorandum by the Royal National Institute for Blind People, p. 144

retail [signifying] a level of accreditation or approval”⁶⁶. The marketing campaign for the digital tick has been successful, and consumers recognise the branding, which is why we believe it makes sense to employ or adapt the same branding for digital radio.

136. It is our view that using a digital tick for radio would lessen the concern and uncertainty surrounding a Digital Radio Switchover by providing consumers with a recognised and trusted mark not only when they purchase a digital radio, but also when purchasing and installing devices in their cars. We disagree with the arguments that using the same logo is likely to confuse consumers. Consumers already cope with the same labelling scheme on different products - and even benefit from it. For example the BSI British standards mark covers “everything from accounting to zoom lenses”⁶⁷ and the energy efficiency ratings are used on a range of household appliances and electronics.
137. We consider it would be a waste of resources to develop and promote a new kitemarking scheme for digital radio to do the same job as the digital tick has done for television. However, the CEG does believe that the digital tick scheme for radio should go further than that developed for television branding by indicating not only that equipment will work following a digital switchover, but also that it fulfils some usability criteria and is future-proofed against any foreseeable future changes in technology. Any copyright provisions which prevent the use of this branding for radio need to be resolved, allowing branding for radio to be put in place.

Scoreboard

138. The idea of a scoreboard format to include information on a digital television’s range of features was welcomed by the CEG. The digital scoreboard can provide consumers with “a consistent, clear and meaningful summary of the most important features they may wish to consider when making a purchase decision”⁶⁸. The CEG felt this was needed for digital television as it is not within Digital UK’s remit to advise consumers on the most appropriate equipment for them. Lessons should be learned from the digital television scoreboard, for example, it could have been more successful if it had been introduced earlier on and if it had been more widely used and more visible in stores. We believe it is useful to consumers to show the differences between digital equipment at the point of sale. A scoreboard should feature prominently on packaging and, in a similar way to the energy efficiency labelling on white goods, equipment should arrive ready labelled and have the scoreboard visible at the point of sale.
139. Using the scoreboard approach in a digital radio labelling scheme would help consumers make the best possible informed choice when purchasing a digital radio to

⁶⁶ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence* Supplementary memorandum by Consumer Focus p. 137

⁶⁷ <http://www.bsigroup.com/en/Standards-and-Publications/About-BSI-British-Standards/>

⁶⁸ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence* Supplementary memorandum by Consumer Focus p. 140

meet their individual needs. This additional information and assistance could also impact positively on a consumer's overall experience of a Digital Radio Switchover.

Role of retailers

140. The role of retailers in advising consumers and ensuring they can make well-informed decisions on digital products cannot be underestimated. As part of the television switchover, retailers have made "tremendous progress but access to well-trained staff and the knowledge and willingness of staff to proactively advise customers varies enormously"⁶⁹. Given the value of radio to consumers with special needs, it is even more important that they are able to make the right choice at the point of purchase. Retail staff should be encouraged to become "accredited digital radio advisers". Access to and awareness of such advisers needs to be increased so that consumers know to ask for them and can be confident of their ability to give appropriate advice.

Timing

141. The CEG was able to play an important role in the Digital Television Switchover as an advisory body to Digital UK and the Helpscheme. The insight the CEG can provide in the development of a public information campaign would also be beneficial to a Digital Radio Switchover.
142. To ensure there is sufficient time and resources to develop effective public communications on digital radio, planning needs to be such that it allows for the CEG to make a valuable contribution.

⁶⁹ Ibid p. 138

Summary of recommendations

- A clear and balanced public information campaign needs to be implemented through a trusted body, independent of the industry;
- Once a switchover date is announced, sales of analogue-only radio must stop;
- A post-announcement information campaign to target vulnerable groups should be developed;
- The digital tick should be adopted for digital radio and adapted as necessary;
- A 'scorecard' should be displayed on all products to convey more information about the available features at the point of sale;
- A digital radio pre-purchase checklist should be widely available and at point of sale;
- An effective training and "accredited adviser" scheme needs to be developed for retailers;
- The CEG must be involved in the minimum specification for digital radio;
- The CEG must be involved in the design and development of any public information campaigns.

Chapter 8: Consumer support and a help scheme

Introduction

143. The Consumer Expert Group (CEG) welcomes the work carried out by Digital UK and the Helpscheme to support consumers during the Digital Television Switchover. The success of the television switchover has been due in part to the mechanisms put in place to ensure consumers are well-informed and to avoid or minimise any negative impact on particular groups of consumers. In preparing for a Digital Radio Switchover, Government must use the lessons from the television switchover and provide similar, but improved, programmes and support.
144. The CEG recognises that the case for a Digital Radio Helpscheme will be considered in light of the findings of the full cost benefit analysis (CBA) in the Digital Radio Action Plan. We do not believe the Government can go ahead with the Digital Radio Switchover without an appropriate help scheme for consumers disproportionately affected by the switchover. For many during the Digital Television Switchover, the Helpscheme has been their only route to appropriate accessible equipment and associated support. A help scheme for digital radio must provide a similar mechanism for all those who need it. In partnership with a help scheme, a support mechanism should offer ongoing support for issues which may arise as vulnerable consumers adapt to the functions of digital radios.
145. As mentioned in chapter 2, there is a considerable gap in research into consumer concerns and needs regarding digital radio. We do not know exactly how people use their audio devices, how many devices have other functionality in addition to being a radio, and until more consumer research is carried out, it is difficult to set out the detail for a help scheme and related support. However there are various lessons to be learned from the Digital Television Helpscheme that allow us to set out the general direction of the help that should be available for digital radio switchover.

Help scheme

146. As we consider the Digital Radio Switchover will be imposed by Government and industry, consumers must not be left any worse-off than they were before. Any support should offer consumers a like-for-like exchange of their analogue radios with

digital equivalents. As we mentioned in chapter 2, the average household uses 2 to 3 radios on a regular basis, and an even higher number of radios are used by listeners who are visually impaired⁷⁰, it is therefore not appropriate to provide consumers with just one piece of equipment. There is no point implementing a digital “upgrade” if consumers end up with inferior or less radio equipment and any help scheme must reflect this.

Eligibility criteria

147. The setting of appropriate eligibility criteria is critical to the success of a help scheme. Despite the achievements of the Digital Television Helpscheme, there were a number of gaps in its provision of support which, we believe, were a result of the government criteria it had to operate under. These meant there were vulnerable consumers who needed support but were not eligible and also that the Helpscheme had the resources to provide more support but were restricted by the Government criteria. For example only people who had signed up for the Helpscheme could get a home visit at switchover and after. However, there were others, who fell outside the Helpscheme eligibility criteria or who were eligible for the Helpscheme but did not use it, who needed a home visit but could not get one. With that in mind, we believe the eligibility criteria for a help scheme for digital radio should be broader than that for digital television.
148. The Consumer Focus review of the Digital Television Switchover in the Scottish Borders (the Digital Diaries project⁷¹) found that, although the Helpscheme was a vital source of financial and practical support for vulnerable consumers, the eligibility criteria were so narrow that many disadvantaged consumers have missed out. Expanding eligibility to include other vulnerable individuals, people on low incomes and, for example, everyone over the age of 65 would improve the effectiveness and impact of the available help.
149. As was evident in chapter 6, the groups of consumers most in need of enhanced accessibility features in equipment are blind and partially sighted people. From the perspective of organisations representing these consumers, a help scheme for digital radio should include two criterion to ensure their client group receives appropriate help. First, a criterion to cover everyone who is registered blind or partially sighted. However, only a small percentage of people who acquire sight loss in later life do register. As these older non-registered blind and partially sighted people would also require the support provided by a help scheme, a second criterion covering everyone over 75 would capture most of those who do not register.

⁷⁰ Freeman, J, Lessiter, J and Ferrari, E. (2008) *Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio*, p. 46.

⁷¹ Consumer Focus Scotland (2009) *Digital Diaries*

150. The experience of CEG members who deliver services shows that other groups identified as needing assistance are people with learning disabilities or cognitive difficulties such as those caused by Alzheimer's or brain injury.

Scope

151. For blind and partially sighted listeners, a help scheme for digital radio should provide appropriate accessible equipment, as set out in chapter 6, which may not be available in the mainstream market. The main feature not currently provided by the market is voice output technology which would allow for spoken menus and spoken programme guides⁷², and this should be available through a help scheme.

152. All vulnerable listeners may need assistance initially to operate their new equipment or specially adapted equipment. Recent research from British Wireless for the Blind Fund has shown that recipients of accessible sets required in general between one or two instructional visits, but there are others who require up to four home visits. The common factors contributing to further home visits have been identified as:

- Retuning presets in areas with little or no DAB coverage;
- Loss of station presets;
- The recipient's prior experience and limited confidence with electrical equipment;
- The limited availability of support from family and friends;
- Limitations to the recipient's ability to retain information. For example research shows that the older a person is, the more difficult it can become to retain information;
- The extent of a recipient's sight loss - people with more severe sight loss requiring more home visits;
- The absence of audio instructions on CD and tapes which come with the set.⁷³

153. With the possibility of such a range of difficulties, it is important that a help scheme for digital radio is delivered via as many instructional visits as required, allowing the user to learn how to use their equipment and ask questions. As many recipients of the outreach support available for the Digital Television Switchover required home visits but were not eligible for them under the Digital Television Helpscheme, there needs to be a review into the balance between a help scheme and any ongoing support mechanism. Home visits and aftercare need to be better planned and funded at the local level in a Digital Radio Switchover.

⁷² Freeman, J, Lessiter, J, and Ferrari, E (2009) *Are you really listening? The equipment needs of blind and partially sighted consumers for accessible and usable digital radio*, a full checklist of requirements available in chapter 9.

⁷³ British Wireless for the Blind Fund (2010) *Report on attitudes and opinions from blind and partially sighted people into the digital switchover*, pp. 4-5

154. The remit of any help scheme should also allow for flexibility to extend or change the reach of the support in the course of its deployment in order to best benefit the people who need support. This has recently been evident with the Digital Television Helpscheme where the government decided to extend its criteria to cover care homes. This change has not been easily implemented and a help scheme for digital radio should provide greater flexibility to address consumer needs as they arise.

Publicity

155. The parameters set by the Government for the Digital Television Helpscheme (i.e. region by region roll-out rather than national roll-out) meant that the publicity for the Digital Television Helpscheme was mainly staggered. This seems to have been a major contributing factor to its low take-up. We have found that vulnerable consumers have not been informed early enough of the assistance available to them and the benefits of the Helpscheme. They have not been prepared for switchover, have panicked and made ill-informed decisions on low quality equipment and equipment which does not meet their specific needs. Other eligible consumers have not taken up the Help Scheme offer as “they already had a box or they perceived the £40 payable by those not on means tested benefits as expensive. Families had often provided a box to an older relative in the belief this would prepare them for the switch without understanding the implications of the need to retune. Families may also offer the advice that a box can be bought locally for much less than getting one for £40 through the Help Scheme, without understanding the additional support that is offered through the Scheme. For example, £40 is far less than having to pay £80 to get help from a retailer to retune”⁷⁴.

156. Many vulnerable consumers cannot afford to make the mistakes with purchasing digital radio equipment they made with digital television. In the context of digital television, failings of cheap set-top boxes were lessened by the fact consumers could still rely on the quality and familiar functions of their television sets. A cheap digital radio may not only see consumers lose out on usability features and support, but also on the sound quality and reception their analogue sets may have offered them. It is therefore vital that vulnerable consumers are well-informed on the equipment and assistance available.

157. The CEG has identified suggestions about the roll-out of a help scheme and the information available, which should be implemented with any help scheme for digital radio. The CEG recommends that any help scheme and its benefits be advertised early on in the preparation process on a national scale and as part of the switchover advertising, particularly given that a Digital Radio Switchover will happen on one day not through the staggered approach adopted for television. This will also

⁷⁴ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence Memorandum by Age Concern and Help the Aged* p.117

ensure consumers “realise that the help scheme equipment design and assistance is tailored to their needs and [also] realise the benefits the help scheme might have for them as compared to a high street purchase”⁷⁵.

158. Vulnerable consumers must also be well-prepared for a Digital Radio Switchover and the timing and distribution of publicity material and reminders for a help scheme are instrumental in this. Consumer Focus Scotland’s Digital Diaries project found that “vulnerable consumers were not well informed or prepared early enough in the process, partly because the Digital Switchover Help Scheme was not fully communicated. Retailers were not consistently well prepared for switchover, leaving consumers without good information and advice at point of sale”⁷⁶. For Digital Radio Switchover it will be necessary that any help scheme is publicised on a national scale, that help scheme publicity begins at the same time as the general information campaign on switchover, and that consumer groups are involved in the development of publicity material.

Information pack

159. Consumer groups have identified the early weaknesses of the Digital Television Helpscheme’s information pack and the Digital UK information systems as follows. Even though these points have now been addressed, they must be taken into account as lessons learned in the early stages of planning for a digital radio help scheme:

- “Help Scheme leaflet and offer of help is complicated and made in writing, forgetting the significant number of disabled people who are unable to read.
- People have missed the help that is available to them due to not understanding the communication or seeing it as junk mail.
- Digital UK provides a lot of its information and support online and this is not necessarily readily accessible to older and disabled people”⁷⁷.

160. It was found that the use of trusted logos, such as that of the BBC and those of charities, on envelopes containing switchover information reduces the instances when the information is thrown away as junk mail. The information pack for a help scheme for digital radio should therefore include trusted logos, reflecting the fact that charities have been consulted on the printed material. The information should also be available in a range of formats, including the internet but also via a freephone helpline. Finally, there should be an easy mechanism for consumers to contact the help scheme and

⁷⁵ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence Memorandum* by Royal National Institute of Blind People (RNIB) p. 125

⁷⁶ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence Memorandum* by Consumer Focus p. 118

⁷⁷ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence Memorandum* by W4B – The TV and Radio Charity p. 121

express their wish to sign up for assistance, for example through one national phone number.

Ensuring the voluntary sector is resourced to engage

161. We have found with the Digital Television Switchover that consumer problems do not end with installation of equipment and a successful switchover. There are a number of issues which may arise following switchover and once the Helpscheme has left the area. These have ranged from difficulty retuning and resetting sets to integrating other equipment. Similarly, the technical nature of digital radios means that for some consumers “the provision of DAB receivers that are usable and accessible for them would be enough, but for many others learning opportunities on how to use the sets and any new functions as well as ongoing assistance would be essential”⁷⁸. It is important that consumers can access effective local support both during and after switchover, particularly those who do not fall into any help scheme’s criteria.

162. During the Digital Television Switchover process, outreach support was organised by the voluntary sector in a number of ways: through the especially established organisation “Digital Outreach Ltd⁷⁹”, but also through specialist organisations such as W4B – The TV and Radio Charity and through existing voluntary sector advice and technology support services. The lessons learned from this experience are as follows:

- support in their own locality needs to be available to vulnerable consumers during and after any switchover;
- some people who did not qualify for the Digital Television Helpscheme turned to voluntary sector organisations for face to face support and home visits;
- some voluntary sector organisations reported that the demand for their services was much higher than they had estimated and budgeted for.

163. These lessons must be considered in the planning of support for a Digital Radio Switchover. As the next paragraph explains the voluntary sector cannot be expected to take on this outreach role without additional resourcing and may not have the capacity to meet the demand. We agree with recent research which recommends that outreach work should begin “engaging the local voluntary sector at an early stage – for example a year before the switchover date – and provide voluntary organisations with sufficient resources to carry out this work and to reach the most isolated and vulnerable individuals”⁸⁰.

⁷⁸ Consumer Impact Group (2008) *Report to the Digital Radio Working Group* p.6

⁷⁹ A consortium that brings together Age Concern England, Help the Aged, Community Service Volunteers and Collective Enterprises Limited.

⁸⁰ Consumer Focus Scotland (2009) *Digital Diaries* p. 23

Ongoing support to end users

164. We urge the Government to recognise the contributions charities will make in providing support and expertise during a Digital Radio Switchover. Since the start of the Digital Television Switchover, the upturn in demand for charitable services has been particularly striking for British Wireless for the Blind Fund and W4B – The TV and Radio Charity, the latter of which experienced a rise in applications by over 60 per cent⁸¹. We expect a similar rise in demand during a switchover to digital radio not only for the provision of appropriate sets but also for the training in how to use it. The resulting costs will be difficult for charities to absorb in these times of economic restraint and reduced budgets. They may also undermine the ongoing support these charities provide to some of the most vulnerable in society. Government must consider the short and long term impact upon charities in the development of a help scheme and further assistance for a Digital Radio Switchover.

Summary of recommendations

- Any Digital Radio Switchover must be accompanied by a help scheme to assist those who would find it disproportionately difficult to switch;
- The eligibility criteria of a help scheme should include people registered blind or partially sighted, those on low incomes, the over 65s and those with learning disabilities and other cognitive difficulties such as Alzheimer patients;
- A help scheme for digital radio should provide appropriate accessible equipment and include as many instructional home visits as necessary;
- A help scheme should be publicised early on in the information process on a national level and the publicity should coincide with the start of the national information campaign for a switchover;
- The CEG must be consulted in the preparation of printed material and publicity on the help and support available;
- The engagement of the voluntary sector in providing assistance with a digital radio switchover should be properly supported and funded;
- Government should ensure that charities, such as Wireless for the Blind Fund and W4B, are not undermined financially or strategically by a help scheme or any of its components, as these charities will be left with providing the ongoing of support, assistance and help people need once a help scheme has finished.

⁸¹ House of Lords Communications Committee (2010) *Digital switchover of television and radio in the UK – Evidence Memorandum* by W4B – The TV and Radio Charity p. 124

Annex A: Members of the Consumer Expert Group who contributed to this report

Leen Petré	Royal National Institute for Blind People (Chair)
Gretel Jones	Age UK (Vice Chair)
Robert Clark	Voice of the Listeners and Viewer
Margaret Grainger	British Wireless for the Blind Fund
Alison Hopkins	Consumer Focus
Tim Leech	W4B – The TV and Radio Charity
Susan Marks	Citizens Advice
Ruth Myers	Telecommunications Action Group (TAG)
Katie Waller	Which?

Annex B: The Consumer Expert Group and Digital Television Switchover⁸²

Introduction

165. The Consumer Expert Group was appointed by the Broadcasting Minister, Lord McIntosh, in June 2003 to advise Government on consumer issues relating to digital switchover. The Group's terms of reference regarding digital television are as follows:

- To help the Government clarify and develop the criteria set for switchover in September 1999 by the Secretary of State for Culture, Media and Sport;
- To undertake research and take expert advice on issues of particular relevance to consumers;
- To work with Government to determine what research needs to be done;
- To advise Government on consumer issues such as communications with consumers, equipment and installation issues and regional issues;
- To advise Government on the process of consultation and who should be consulted;
- To prepare a section on consumer issues, including framing questions, for inclusion in a Government public consultation paper to be published in Spring 2004;
- To respond to the public consultation;
- To advise Government on post-consultation interpretation of criteria.

166. It is also open to the CEG to take advice from consumer groups and charities not represented on the Group and from other bodies if they consider that they need additional expertise.

⁸² Taken from the Department for Culture, Media and Sport (2008) *Equality Impact Assessment of Digital Switchover*

Persuasion or Compulsion?

167. The CEG's initial findings were published, in September 2004, in the report *Persuasion or Compulsion? Consumers and Analogue Switchover*. The main findings were that:

- steps were needed to ensure converting to digital television is affordable to all households including those on low and fixed incomes;
- some measures should be put in place to assist low income and special needs groups to switch to digital television, including clear criteria identifying those who will be eligible for assistance under a help scheme and should provide them with assistance for the full costs of converting one set;
- before the switchover date was announced, 70 per cent of households should have adopted digital television for their main television set; and
- the profile of switchover generally needed to be raised through a public information campaign on both consumer issues and switchover policy.

168. The Group concluded that it was not appropriate to set access criteria, but before switchover was announced, specific plans should be in place to address the needs of disabled people before switchover actually takes place.

169. The Report recommended that there must be a choice of fully accessible digital television receivers for all platforms and all digital equipment should include basic access features and that outstanding issues associated with electronic guides and menus, remote controls and connectivities must be resolved.

Further reports

170. The CEG has published two reports that assisted in the development of the Digital Switchover Help Scheme. Government wanted to ensure equipment provided by the Scheme was designed with the users need in mind and the first of these reports, *Digital TV equipment: vulnerable consumer requirement*, published in March 2006, set out the core receiver requirements for consumer equipment that the Group considered best suits the needs of older and disabled people. The second report, *Supporting vulnerable groups through switchover*, published in July 2006 set out the Group's views as to the nature of the support package being offered and made a number of recommendations.

Consultative role

171. The independent advice and the recommendations made by the CEG in their reports formed part of the ongoing consultation with stakeholders throughout the Digital Television Action Plan.

172. The CEG continues to deliver regular feedback through quarterly meetings with the Government, Digital UK and the Digital Switchover Help Scheme. The Ofcom Consumer Panel and the Ofcom Advisory Committee on Older and Disabled People also attend.

Annex C: Consumer Power Questions for Digital Television

Power Questions: what to look for when you buy a digital TV product

- Say what your needs are up front in the shop, for example mention any sight, hearing or dexterity problems anyone in your household has. Tell the shop assistant that you expect the equipment to be suitable for those specific needs.
- You have the right to return goods and get a refund or a replacement if they are faulty. You have the same rights if the goods are not fit for their purpose. So if you tell the seller that you need them for a specific purpose, they should be fit for that as well as for general use. You need to return the goods as soon as possible, and preferably within 7 days of the purchase. If you take longer you may lose the right to a refund, but you should be able to opt for a replacement.
- Look for the digital tick logo. It guarantees that a digital TV product will work through and after switchover. If you are interested in usability of equipment, read on because the digital tick does not currently guarantee usability of equipment.

There are a range of features and characteristics that will differ between makes and models of digital TV products, and as you are likely to use your digital TV on a daily basis, it is important to find a system that meets your needs.

1. General features

- How far will I be sitting away from the TV screen in my home?
 - Different products have different on-screen TV guides and some are more legible than others. Ask the shop assistant to show you the on-screen guide before you buy. Check for yourself whether you find the on-screen guide legible, whether the colour contrasts and letter sizes suit you.
- What other equipment do I want to connect?
 - Tell the shop assistant what you will want to connect and check whether the product has a sufficient number of connecting slots to allow you to do this. For every piece of equipment you are likely to need a connecting SCART socket.

- Is my existing TV old or relatively new?
 - If you are planning on buying a set-top box and your existing TV is old it might not have SCART sockets, in which case you will need a digital box that incorporates a modulator.

- Will I want high definition TV now or in the future?
 - It is not necessary to get an HD ready or high definition product to get digital TV, but if you are interested in HD ask the shop assistant for your options because not all products support it.
 - Do I want equipment that is more energy efficient? Some digital TV products and TV screens consume less power than others. If this is of interest to you look for one with the energy saving recommended logo.

- How much space have I got?
 - Some set-top boxes can sit on top of a regular TV, whilst the larger ones need their own shelf.

- Do I want to listen to radio via my TV?
 - If the answer is yes, then you might want a product that has a radio/TV button. This quickly switches between TV and radio stations. Without this you have to scroll all the way through the TV channel list to get to the radio channels, or enter the radio station's three digit number into your remote control.

- Do I want to delete unwanted channels from my on-screen guide or set up my own favourites list?
 - If the answer is yes, then ask for a product that offers this option.

- Do I feel comfortable using 2 remote controls?
 - When you buy a digital set-top box or digibox you will normally have to use 2 remotes: one to control your TV and one to control the box. If you do not feel comfortable doing this, ask the shop assistant whether the remote can be set to also control your TV or consider buying an integrated digital TV.

- Does anyone in my household have a sight problem?
 - If the answer is yes, they might be interested in a product that can receive audio description. Audio description is an additional commentary that helps people with a sight problem to picture the on-screen action, body language and facial expressions. Few brands and models can deliver audio description. You can look on www.rnib.org.uk/tv or ring RNIB on 0207 391 2398 for an up to date list of the models that have this feature.

2. The remote control:

You use the remote control for a host of features and a good design can make all the difference. In fact the best remotes can be operated with one hand without looking at them. Here are some things to look out for:

- Does anyone in my household have a problem operating very small buttons?
 - If the answer is yes, then look for a remote control with decent size buttons. Some remotes can be very small indeed.

- Does anyone in my household have difficulty finding the buttons on a remote control?
 - Ask the shop assistant to let you try the remote that comes with the product you are planning to buy. Check whether the buttons are well spaced out. Make sure you are comfortable with at least the following buttons: on and off, channel up and down, volume up and down, on-screen guide, number buttons

- Is anyone in my household deaf or hard of hearing?
 - If the answer is yes, then it is useful to know that almost all digital products deliver subtitles but you might want to look for a remote that has a separate button to switch them on. Some products will always display subtitles when switched on and hold the subtitles across channel changes.

- Does anyone in my household have a sight problem?
 - If the answer is yes, consider whether the remote has differently shaped buttons, good contrast between the casing and the buttons and well spaced out buttons as that can be helpful. Larger size buttons can also be helpful.

- Does anyone in my household prefer a system that can be used without a remote control?
 - If the answer is yes, look for equipment that allows you to change volume and channel from easily reachable controls on the front panel of the digital TV or set-top box.

3. Recording.

If you are buying a digital TV recorder to replace your analogue DVD recorder or VHS recorder:

- Do I want to record one digital channel while watching another?
 - Make this clear to the shop assistant and explain what other equipment you have at home. You will most likely need a recorder with twin tuners.

- How many hours will I want to record?
 - Most digital recorders have a built-in storage device, for example 80Gb or 160Gb hard discs, storing around 40 or 80 hours of TV. If you think this is not enough space for you, consider having a DVD digital recorder that can store on recordable discs.

- Do I want to record on to discs or do I prefer to record on to a hard drive so that programmes stay on the machine itself?
 - Let the shop assistant know whether you want a recorder with built-in storage (hard drive) or one that records on DVD discs that you can take away, or both.

- Do I want to record an entire series?
 - If the answer is yes, then you might be interested in a series link feature system that will automatically record all episodes or a system that automatically records at the same time every week or every day.