

AER's answer to the European Commission's Call for Evidence on the Digital Networks Act

AER - the Association of European Radios, represents commercial radios across Europe. AER welcomes the opportunity to respond to the Commission's call for evidence. The upcoming revision of the European Electronic Communications Code (EECC) and proposal for a Digital Networks Act (DNA) offer a unique opportunity to secure the future of radio in cars and the long-term spectrum availability for broadcast radio.

Preliminary remarks

The upcoming DNA, along with the revision of the EECC and related legislation, directly affects the foundational conditions for distributing reliable licensed media services across Europe. Whether through broadcast transmission or digital networks, stable and high-quality infrastructure is essential for broadcasters and media services to fulfil their democratic role: delivering trustworthy, well-researched journalism that informs the public and helps shape opinion, thereby strengthening democracy.

Radio in cars

Radio continues to play an essential role in European society, providing trusted, high-quality, and easily accessible information. In times of crises, such as natural disasters or major emergencies, broadcast radio plays a critical role in keeping the public informed. When all else fails, broadcast radio is the only way for people to stay up to date with news and public safety alerts and recommendations. The recent power outage in Spain and Portugal highlighted the crucial role of radio.

In the automotive context, radio continues to be the most preferred audio platform for drivers, valued for its familiarity, ease of use, and universal and free accessibility. Notably, 80% of car buyers say they would be less likely to purchase a car without radio.

With the number of connected cars on the road increasing every year, radio broadcasters are facing growing competition for listeners' share of ear from other sources of digital audio.

One of the most significant challenges that connected cars pose to radio broadcasters relates to securing access and findability for 'radio' on in-car infotainment systems. As the number of in-car entertainment and information options continues to increase, radio broadcasters must maintain a front and centre position on drivers' dashboards. Regulated access and findability for 'radio' in car dashboards is needed, given the unprecedented bargaining power that connected platform providers wield, and their ability to use this to insist on the exclusivity of their own platforms in cars.

An example is the car version of successful mobile phone software, like Android Auto and Apple Car Play that enable smartphones to connect to and drive the interface of connected car infotainment systems, promoting certain predefined applications, including audio. As most car manufacturers have a global footprint, they may prefer to deal exclusively with global connected platforms, at the expense of local European radio broadcasters.

Moreover, the issue is compounded by the fact that some vehicles are now being sold without radio receivers, especially newer electric vehicles.

Why the future of radio in cars must be safeguarded:

1. **Trust:** radio is consistently rated as the most trusted medium in the EU¹. It delivers reliable, up-to-date information to millions of people.
2. **Resilience in emergencies:** broadcast radio continues to operate when electronic communications networks and power grids fail, offering a lifeline in those times of crisis.
3. **Geographic coverage:** FM/DAB+ offer broader, more consistent coverage than mobile networks, particularly in rural areas and along less-travelled roads.
4. **Accessibility:** radio is universally accessible without end user subscriptions or data plans. Hybrid radio combines FM/DAB+ and IP to ensure seamless listening, while IP-connected apps enable interactive, on-demand features and support future innovation.
5. **Safety and usability:** Prominent access to radio reduces driver distraction, contributing to road safety. A clear radio interface enables drivers to access information quickly and without complex navigation.

Strong measures are critical to uphold the public value of radio, protect access to trusted information, and ensure the sustainability of Europe's audio ecosystem in the digital age.

AER key recommendations:

- **Require all new vehicles of classes M and N placed on the EU market to be equipped with radio receivers supporting FM, DAB+, and IP radio. This ensures interoperability, allows seamless switching between platforms, and guarantees continued access to free-to-air radio across all environments.**
- **Guarantee ease of access through prominent user interface placement or physical controls: radio stations must be easily findable in the user interface, also in accordance with Art. 20 EMFA. A prominently positioned radio button is essential for intuitive and safe access, especially as vehicles increasingly rely on touchscreen interfaces that can distract drivers.**
- **Secure long-term spectrum availability for broadcast radio.**

Radio must remain a core part of in-car infotainment systems to support road safety, media plurality, emergency communication, and equitable access to trusted content across all regions and demographics. The upcoming DNA and EECC revision present key opportunities to legally safeguard radio's role in the connected car environment and protect its long-term presence.

Aspects of culture in DNA and EECC

The EECC recognises the essential role of telecom networks in safeguarding freedom of expression, media plurality, and Europe's cultural and linguistic diversity. Spectrum is treated as a public good with high societal value, and broadcast services are acknowledged for their democratic importance, allowing measures to protect media diversity. Access to spectrum and infrastructure for radio providers reflects their critical societal role. The current multi-level governance model has effectively supported cultural and media diversity and should guide future reforms, including the Digital Networks Act.

¹ Latest [Standard Eurobarometer 102 - Autumn 2024](#)

No network fees – protect media pluralism in Europe

Finally, AER strongly recommends caution against the introduction of any mandatory network fee obligations, whether imposed directly or indirectly through mandatory or stringent negotiations with ISPs. Such additional fees charging for the online delivery of content to audiences, would harm the European cultural and creative sector, burden consumers with higher costs, and undermine net neutrality by granting telecom operators gatekeeping powers over content. For radio broadcasters this could lead to disproportionate impacts, reduced investment, and uncertainty unless explicitly excluded.