



Dear Sir/Madam

RE: Intellect's response to the proposed adoption of T-DMB (ETSI EN 102 428) for audio based broadcast services by France.

I am writing on the behalf of Intellect, the UK trade association for the IT, telecoms and electronics industries. Its members account for over 80% of these markets and include blue-chip multinationals as well as early stage technology companies. These industries together generate around 10% of UK GDP and 15% of UK trade. Within its membership, Intellect represents consumer electronics companies who manufacture a range of digital products for the consumer market, including Digital Audio Broadcasting radio's and in-car devices.

It has recently come to our attention that there is a draft Technical Standards and Regulations procedure currently being considered by the Commission. The French Ministry of Industry is seeking agreement from the Industry Department of the EU Commission to allow France to adopt T-DMB (ETSI EN 102 428) for audio based broadcast services.

It is the purpose of this letter to set out why Intellect and its manufacturing members believe this is the wrong course of action for 3 major reasons.

1. The position that France is intending to take will divide digital radio technological access across the E.U. This will impact upon the take up and access of DAB services by citizens.
2. There are currently no devices available in the market that support T-DMB audio only services which will force manufacturers into making French specific products or install T-DMB video receivers in all sets even if they are not capable of receiving video services. This would place an added cost burden on the consumer and disrupt the roll-out of digital radio across Europe.
3. It is also imperative to consider the automotive side of the DAB business: where vehicles do cross the editorial areas into other member states the added costs in manufacturing products to support the variations in "DAB" formats may disadvantage the consumer.
4. DAB broadcasting and product sales are very well established in the UK and there has been a quick uptake with sales breaking through the 5 million barrier recently. Due to its success as a new market and in the interests of broader harmonisation a DAB format should be considered for other European markets.

Should the Commission launch a consultation regarding the proposed adoption of T-DMB Intellect would be happy to make a more detailed and formal response.

Yours sincerely

Laurence Harrison
Director – Consumer Electronics