

RADIOMEDIA'S POSITION ON THE PROPOSED DIGITAL NETWORKS ACT *Safeguarding universal and easy access to radio in cars* **June 2026**

Executive summary

RadioMedia is the umbrella organisation for Finnish commercial radios. It promotes and safeguards the operating conditions of commercial radio in Finland and participates in legislative and policy discussions affecting the radio sector. RadioMedia is a member of both the Association of European Radios (AER) and the Finnish Media Federation (Finnmedia).

RadioMedia supports the Commission's objective of strengthening Europe's digital connectivity, network resilience and competitiveness. The proposed Digital Networks Act (DNA) is, however, not only a telecommunications file. For radio, it will materially affect whether citizens can continue to access free-to-air licensed radio services in increasingly connected and software-driven vehicles.

Radio in cars must not become optional. The DNA must not merely regulate receivers where manufacturers choose to integrate them. It must require relevant new vehicles placed on the EU market to be equipped with terrestrial broadcast radio reception and ensure that radio remains directly accessible and easy to find in the vehicle interface.

For Finland, the central point is straightforward: commercial radio is still practically FM-based. DAB has not developed into a mass-market substitute in Finland, and IP distribution is complementary, not equivalent to terrestrial broadcasting. Access to radio in cars must therefore not be deemed sufficiently safeguarded by DAB or IP alone.

RadioMedia asks Finnish and EU decision-makers to ensure that the DNA preserves universal and easy access to radio, protects national flexibility and long-term certainty in spectrum policy, and prevents any direct or indirect network-fee obligation on media services.

RadioMedia's four priority asks:

- **require new relevant vehicles, including categories M, N, L6, L7 and T, to be equipped with terrestrial broadcast radio reception, explicitly including FM;**
- **ensure radio is directly accessible and easily findable in in-car interfaces, for example through a dedicated hard or soft radio button;**
- **preserve national flexibility and long-term certainty for broadcasting spectrum, especially the FM band in Finland; and**
- **reject any mechanism that could lead to network fees, indirect payment obligations or discrimination against media services online.**

1. Why the DNA matters for Finnish commercial radio: safeguarding FM access in connected vehicles

The proposed Digital Networks Act would replace the European Electronic Communications Code with a directly applicable regulation and reshape the EU framework for electronic communications networks and services. For radio, this is not only a telecoms file. It will materially affect whether citizens can continue to access free-to-air licensed radio services in increasingly connected and software-defined vehicles.

This shift from a directive to a regulation makes it particularly important that the final text reflects national market realities. In Finland, terrestrial radio reception is overwhelmingly FM-based. A regulatory solution built around digital terrestrial radio alone would not be technology-neutral in practice, because it would protect a distribution mode that is not the functioning mass-market infrastructure for Finnish radio listeners.

Radio remains one of Finland's most widely used media. In 2025, radio reached 83 per cent of the Finnish population weekly, corresponding to 4.3 million people. Commercial radio alone reached 3.4 million Finns weekly. Radio is therefore not a legacy service, but a current, high-reach and low-threshold medium that must remain available in the environments where people use it, especially in cars.

2. Radio in cars: not optional - access must be guaranteed

The most important DNA issue for RadioMedia is the availability, usability and findability of radio in vehicles. Cars are becoming software-defined environments. Audio access is increasingly mediated by operating systems, app stores, voice assistants, dashboards and commercial platform partnerships. If radio is not built into the vehicle and easy to find, it can effectively disappear from the user experience even if radio services continue to exist.

The DNA should therefore not merely require interoperability of a receiver if a manufacturer chooses to integrate one. Such wording leaves a material loophole: a vehicle placed on the market without any broadcast radio receiver would not be captured by the obligation. The legislative objective should be expressed positively: relevant new vehicles made available in the Union should be equipped with a receiver capable of receiving licensed terrestrial broadcast radio services.

For Finland, this must explicitly include analogue terrestrial radio reception, i.e. FM. A requirement limited to digital terrestrial radio would not safeguard Finnish listeners. Nor should IP distribution be treated as a substitute for broadcast reception. IP radio depends on network coverage, network capacity, data plans, device or account settings, platform choices and, often, a paid connectivity environment. Broadcast radio is free-to-air, immediate and resilient.

RadioMedia's position is that the DNA should:

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- require new vehicles in relevant categories, including at least categories M, N, L6, L7 and T, to be equipped with terrestrial broadcast radio reception;
- ensure that the receiver can receive and reproduce FM radio, and digital terrestrial radio where such services are nationally available and relevant;
- ensure that radio can be accessed without a paid data subscription, user account, app installation or intermediary platform gatekeeper;
- require radio services to be directly accessible, easily findable and displayed in a non-discriminatory manner in in-vehicle interfaces, for example through a dedicated hard or soft radio button; and
- allow Member States to maintain or introduce additional national requirements where necessary to reflect national radio markets, preparedness needs and spectrum conditions.

3. FM is indispensable in Finland

RadioMedia supports digital innovation, hybrid radio, metadata, online listening and new forms of audio distribution. These developments are important for commercial radio. They do not, however, eliminate the need to secure the basic availability of broadcast radio in cars.

In Finland, DAB has not been deployed as a consumer replacement for FM. A DNA provision that secures only DAB-capable receivers would therefore not secure radio for Finnish citizens. Similarly, online audio is an important complement to FM, but it cannot provide the same public-interest characteristics: universal free-to-air access, immediate reception, low dependency on intermediaries and resilience in exceptional circumstances.

Technology neutrality should mean protecting the function that citizens rely on, not privileging one nominally "digital" solution irrespective of national conditions. In Finland, that means safeguarding FM while enabling voluntary digital development.

4. Spectrum policy must preserve national flexibility and long-term certainty

RadioMedia supports efficient spectrum use and well-functioning European coordination. At the same time, broadcasting spectrum policy is closely linked to national media policy, preparedness, geography, linguistic needs and market structure. The DNA should not centralise spectrum policy in a way that weakens the ability of Member States to secure nationally relevant broadcasting solutions.

For Finnish commercial radio, the immediate spectrum priority is continued and predictable access to the FM band for licensed radio services. EU-level spectrum policy should not create a direct or indirect pressure to migrate from FM to DAB or IP before a genuine listener-driven and market-supported transition exists.

RadioMedia also supports the broader European broadcasting objective of preserving long-term access to broadcasting spectrum, including the UHF band for broadcasting and programme-making and special events (PMSE). Technologies such as 5G Broadcast may become relevant for future

resilient distribution and emergency communication. These questions are important for the wider media and creative ecosystem, but they should not obscure the specific Finnish commercial radio issue: the need to preserve FM as the functioning terrestrial radio infrastructure for national, regional and local radio services.

Respect for subsidiarity and national cultural competences must remain a core principle of EU spectrum policy. Member States and national regulatory authorities must retain sufficient room to design spectrum policies that reflect national preparedness systems, regional coverage needs and media pluralism objectives.

5. No direct or indirect network fees for media services

RadioMedia is concerned that the proposed voluntary conciliation mechanism could be used to reopen the debate on network fees, including through indirect or de facto pressure on media and content providers. These concerns relate in particular to Article 192, supported by Articles 191 and 193. Even if formally voluntary, such a mechanism could create de facto pressure to enter negotiations with network operators, legitimise payment claims against media services and later be used as a stepping stone towards mandatory network contributions.

Licensed radio services are low-bandwidth, socially valuable and pluralistic media services. They invest in journalism, local content, music, presenters, emergency-relevant information and domestic audio markets. Redirecting resources from content to network charges would weaken the media ecosystem without demonstrating a market failure that would justify intervention.

The open internet and net neutrality must remain intact. Network operators should not gain gatekeeper power over the distribution, prioritisation, pricing or availability of media services. Any conciliation or cooperation mechanism must be strictly voluntary, must not create expectations of payment, and must not prejudice the principle that end-users already pay for internet access.

RadioMedia recommends adding an explicit safeguard that: "Nothing in the Digital Networks Act shall be interpreted as requiring, encouraging or enabling financial contributions by providers of media services to electronic communications network providers for network deployment, operation, traffic delivery or access to end-users."

6. Requested action by Finnish and EU decision-makers

RadioMedia asks the Finnish Government, the European Parliament and the Council to secure the following outcomes in the DNA negotiations:

1. **Close the receiver loophole:** the DNA must require relevant new vehicles, including categories M, N, L6, L7 and T, to be equipped with broadcast radio reception, rather than only regulating receivers that manufacturers voluntarily integrate.
2. **Include FM explicitly:** analogue terrestrial radio reception must be part of the minimum requirement, because FM remains the only universal terrestrial radio infrastructure in Finland.

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3. **Secure findability:** radio must be directly accessible and easy to find in vehicle interfaces, for example through a dedicated hard or soft radio button, without discrimination in favour of global platforms, paid connectivity services or proprietary app ecosystems.
4. **Protect national flexibility and spectrum certainty:** Member States must retain sufficient competence to reflect national radio markets, preparedness systems, geography and spectrum conditions, including continued access to the FM band in Finland.
5. **Reject network fees:** Articles 191-193, and in particular the voluntary conciliation mechanism in Article 192, must not evolve into a direct or indirect fair-share obligation for media services, and net neutrality must be preserved.

Conclusion

Radio is a present-day public value medium, not a residual technology. It supports media pluralism, cultural diversity, local information, emergency communication and everyday access to trusted content. In Finland, commercial radio's reach and resilience depend on the continued availability of FM reception, particularly in cars.

The Digital Networks Act should strengthen Europe's connectivity framework without weakening radio's universal accessibility. A proportionate amendment requiring FM-capable broadcast radio in relevant new vehicles, combined with clear findability safeguards and a firm rejection of network fees, would ensure that the DNA supports both innovation and citizens' continued access to trusted radio services.

Radiomedia ry is registered in the Transparency Register under the REG number 634654736043-36.

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