



31 | 08 | 21 SECTOR INQUIRY ON CONSUMER INTERNET OF THINGS PUBLIC CONSULTATION RADIO FRANCE CONTRIBUTION

1. Voice assistants policy at Radio France

Radio France has been present on voice assistants since the launch in France of the three main providers: Google Assistant, Amazon's Alexa and Apple's Siri. As smart speakers have been gradually replacing traditional radio sets, we consider it essential that Radio France users can listen to Radio France's seven stations and podcasts on these devices. Therefore, we have created a team dedicated to "voice" products and invested a lot of resources in voice assistant product development to offer new content to our users and adapt our programs to the technical requirements of providers.

Access to our content via voice assistants is an **important paradigm shift that will radically change our relationship with listeners**. With FM band and traditional radio sets, radio providers were sure to have access to their public through a neutral connection that could not be influenced, altered or changed by third parties. The 'one to many' connection provided by FM served as a security for an independent and reliable content transmission, which was also crucial for public safety ensuring the provision of public warnings to citizens. With the development of voice assistants and their extension at home, in the car, or on smartphones, access to audio and radio content will be increasingly carried out through third parties, voice assistant providers, which will influence content transmission and users' freedom of choice. Such new intermediation is even more challenging as main actors benefit today from their dominant position both in voice assistant market as well as in adjacent markets, which enable them to impose their conditions on the content made accessible onto their devices.

We note that there is a risk that these partners take **advantage of their gatekeeper position to try imposing unfair contractual conditions** for the provision of our content. This situation is aggravated by three factors:

- **Main way to access to audio content:** We notice that voice assistants are increasingly becoming the one of main ways to access audio content. Traditionally associated with smart speakers, they have now been rolling out in all environments where physical keyboards are absent: on smartphones or in the car via their integration into infotainment operating systems.
- **"One-result" selection:** Contrary to other audio digital services (ex. podcasts applications, search engines), voice assistants provide users with only one result, instead of a list of results, thereby making itself the choice for the user and directly influencing the selection;
- **Multiplication of intermediaries:** Voice assistant providers often use themselves third party providers to offer content to their users, making it more difficult to obtain data.

Radio France's objective is to bring radio to all audiences on these different media to offer reference information, bring citizens together and make cultures accessible to all. Developing access to audio content via voice assistants and its consequential intermediation poses real challenges for media plurality and users' access to quality information, which may be ultimately detrimental for audio content and innovation.

Examples of Radio France's content provided on voice assistants

<p>News flashes Franceinfo</p> 	<p>When the user requests the latest news, the franceinfo flash is read directly to him. This flash is based on franceinfo headlines. Lasting one and a half minutes, it is adapted to the user's needs: to be briefed very quickly on the latest news. Updated four times an hour, the headlines are constantly renewed. This flash is available in video format for voice assistants equipped with a screen.</p>
<p>La Récré à Sons</p> 	<p>Radio France launched the Alex skill "Récré à Sons", which provides children with a screen-free experience specially designed for them. Particular attention has been paid to the sound universe, tone and vocabulary so that children over - 4 can navigate their favourite Radio France podcasts by voice and in complete autonomy. It includes more than 250 episodes of 10 Radio France programmes and 2 themes: listening to stories & learning.</p>
<p>La Ligue 1 by France Bleu</p> 	<p>Radio France has created skills on Alexa and Google Assistant which feature every weekend football games of the French football championship. Football fans can listen to the game live or games' summaries provided by France Bleu journalists.</p>

2. Issues faced in voice assistant environments

We have been facing five main issues as regards the use of our content on voice assistants.

A) By-default settings favouring voice assistant providers' audio services

Voice assistants' providers have often developed audio and radio services, which are pre-installed and set as default services on voice assistants, with the risk of excluding third-party services like Radio France to be directly launched on these devices. In some cases, the user may not have the possibility to opt for another service. In others, he has to go through multiple steps in order to change the audio application directly launched onto the voice assistants.

B) No data-sharing by voice-assistant providers or third-party services installed thereto

When our content is played via third-party services on voice assistants, it is difficult to obtain data, either from the voice assistant provider or from the third-party service provider through which the content is played. This affects our capacity to obtain a better knowledge of the radio programmes and podcasts listened to by the users, to enhance their experience and to fulfil our legal and contractual obligations towards other partners (e.g., remuneration of rights holders).

C) Lack of brand attribution

When content is played on voice assistants, we note that the application from which it originates is often not mentioned. As a consequence, the user may not know that a content is played directly through Radio France application or through a podcast aggregator.

D) Content integrity

In several instances, we have noticed that voice assistant providers ask for our content to be checked before being made available on their platform, to see whether it complies their terms and conditions. This practice seems to be at odds with the neutral transmission that could be expected of voice assistants, and is questionable in view of the principle of “net neutrality” enshrined in Article 3 of EU Regulation 2015/2120.

E) Self-preferencing in search results and in reservation of “deep links”

Finally, we see a risk that voice assistant providers are increasingly reserving for their own content so-called ‘deep links’ allowing users to call in programs through the most natural terms.

In light of these elements, we welcome the first findings of the European Commission’s sector inquiry which have rightly pinpointed issues in the voice assistants’ sector. We also welcome Vice-President Margrethe Vestager’s statement on these initial findings in which she recognises the “central role that voice assistants play in the interconnection of different smart devices and services”, and considers that “it is precisely because the Internet of Things is developing fast that we need to ensure it does so in a competitive way”, as there are “indications that some practices that we know too well may lead to tipping and to the emergence of gatekeepers”.

In her statement, Vice-President Margrethe Vestager stressed that a number of the practices reported in the inquiry feature in the Do’s and Don’ts of the Commission’s proposal for the Digital Markets Act”, and that “the sector inquiry will certainly contribute to the debate on the scope of the Digital Markets Act. We believe the Digital Markets Act regulation is an essential step in restoring and promoting a fair relationship between gatekeepers and radio companies. This is a unique opportunity to promote a fair and open online audio environment, at a crucial moment for this emerging market.