

In light of the further evidence presented in this document, Ofcom proposes to allocate three blocks of spectrum in VHF Band III, sub-band 3 for local radio multiplexes under the licensing process set out in the Broadcasting Act 1996, with the aim of covering geographical areas that do not presently have local radio multiplexes. Ofcom also proposes to allocate one block of spectrum in the same sub-band for a national radio multiplex under the licensing process set out in the Broadcasting Act 1996.

Do you agree that these proposals represent the optimal use of the spectrum?

It is not clear if your proposals represent the optimal use of the spectrum or not.

Industry survey after industry survey shows that the greater choice of stations on DAB drives sales of DAB sets. If there is to be only one new national multiplex (rather than two as suggested in your original document), then it will be important to use the other three new multiplex blocks as efficiently as possible in order to provide new multiplexes across as much of the country as possible.

Where there is just one local multiplex, the attractions of DAB radio are not best discovered, particularly when a local multiplex contains a large number of existing local stations.

I am concerned that this document goes no further in explaining Ofcom's policy in planning additional local/regional multiplexes above and beyond the plan to fill in the "white areas" on the local DAB map. If the white areas are filled up **before** consideration of what priority Ofcom will take in allocating further local multiplexes, then some options for the future will be closed off forever. (This is precisely what has happened with the allocation of the first seven DAB blocks – where, according to para 6.115, re-planning the existing blocks at the same time as implementing the new blocks is practically impossible. Had all twelve blocks been planned collectively from the start then a more efficient pattern of re-use could have been possible).

I therefore ask Ofcom to fully explore the options for the local multiplex blocks, and to decide on a strategy for further allocation, before allocating and advertising any new local multiplexes.

This strategy should give priority, alongside filling in the white blocks, to providing as many areas as is technically and commercially possible with a second tier multiplex.

My specific personal interest as a listener is that the new frequency blocks will be used to provide a long-awaited regional multiplex for the East Midlands. This would allow my home city of Nottingham to enjoy the same level of choice in DAB radio formats as other comparable cities (e.g. Bristol, Wolverhampton, Cardiff, Newcastle or Leeds). However, parts of your latest documents suggest that new regional multiplexes are not a priority, or even a consideration at this stage.

(A similar case might be made for East Anglia or the Solent region, where FM stations have been licensed at regional level yet there is no equivalent DAB regional multiplex.)

The case for an East Midlands multiplex

The East Midlands is poorly served by DAB so far. There are multiplexes in Leicester and Nottingham, but none in Derby or Lincoln. There is no regional multiplex.

What this means for a Nottingham listener is a slim selection of stations or formats, and a subsequent disincentive to upgrade to DAB.

Nottingham's local multiplex has to cater not only for the local analogue stations, but the two regional FM stations as well. This means that five slots on the Nottingham multiplex are filled with simulcasts of the existing local/regional stations (4 commercial, 1 BBC). Local DAB in Nottingham therefore offers **only four new stations** and yet the multiplex is already full to capacity. Meanwhile, listeners in Bristol enjoy **fourteen** new local digital stations; Wolverhampton listeners enjoy **twelve**; Leeds listeners have **thirteen**.

*(Ofcom staff listening to your DAB radios in Riverside House, incidentally, enjoy **twenty** new local digital services, above and beyond the **thirteen** existing local analogue services also available on DAB. Please consider: Nottingham's one local multiplex means that my local radio choice – even **after** buying a DAB radio - is still less than a Londoner's existing local FM and AM choice **before** investing in DAB)*

Furthermore, because of the requirement for regional multiplexes to offer different formats to local multiplexes, and the size of the potential audience of regional multiplexes, comparable cities within existing regional multiplex areas not only enjoy more stations, but more distinct stations: urban, jazz, chill, pre-school interest, rolling news, classic rock, world music and country formats are all niche formats available on local/regional multiplexes.

In contrast, three of the four new formats offered by Nottingham DAB are mainstream formats which have been licensed on analogue in other regions: dance/RnB (Galaxy); rock (Storm); and Asian music (Sabras). The only arguably “niche” format offered is the teen pop station Capital Disney, which offers not a different type of music to existing stations, but merely a more targeted version of a CHR service.

When you look at a map, with the proximity and greater populations of Yorkshire to the north, and the West Midlands to the west, it becomes clear why the East Midlands did not benefit from regional DAB in the first round of licence awards, when there was limited spectrum capacity.

Yet the East Midlands is no less a significant area economically than other areas with a second regional multiplex tier. The East Midlands FM stations broadcast to an area which is almost identical in population to the Severn Estuary regional FM station (Vibe),

which broadcasts on a regional multiplex. And it was widely reported that Chrysalis Radio paid £30 million for Gcap Media's East Midlands' 106 Century FM station. It is clear that the major radio groups are prepared to invest considerable capital to broadcast to this region.

Why Ofcom must consider “all areas” alongside “white areas”

Paragraph 6.146 of your document states:

“In addition to the local multiplexes identified in the above table, it may be possible to use some of the three blocks of spectrum to provide further local, or regional, multiplexes in certain parts of the UK. This potential spectrum 'dividend' has not yet been fully examined, as our priority has been to plan local multiplexes in areas where local digital radio provision does not currently exist. However, in principle, we consider that these three blocks of Band III spectrum could be used to support further multiplexes in addition to those listed in the table above. We will consult fully before deciding on how to proceed with this matter.”

But a glance at the maps in the document shows why Ofcom **must fully examine the potential spectrum dividend immediately, and certainly before permanently allocating or advertising any new local multiplexes.**

Figure 9 in your consultation document shows how one extra block of spectrum could cover the “white areas” on the local DAB map. The potential Derby multiplex is a pink blob in the centre of the map, joined to no other areas. The implication from the text is that a separate Derby multiplex could be provided even with one extra block of spectrum – without causing interference with the areas marked A or X on the map.

Of course, it is not practical to use just one frequency block to cover the white areas, and so areas A and X are later split up in Fig 10. Now we see that Derby and Lincoln could share a block of frequencies without mutual interference, although Lincoln has to share with North Norfolk.

So, in order to allow Lincoln and North Norfolk (and others) their own multiplexes, you arrive at your compromise proposals in Fig 11 – three new blocks of spectrum allocated to local DAB. But now, not only is North Norfolk on a different frequency block to Lincoln, but so is Derby, even though keeping Derby and Lincoln on the same frequency block would appear to have no deleterious effect.

Now, if Ofcom's policy is **only** to fill in the white areas, then it doesn't matter with which other multiplex Derby is co-sited in terms of its frequency block. But it is clear that **allocating one of three separate frequency blocks to each of Derby, Lincoln and Northampton completely rules out the potential of an East Midlands regional multiplex** (in a similar MCA to that of Heart 106 FM) as there is no remaining frequency block that could cover the East Midlands region without overlapping or bordering one of Derby, Lincoln or Northampton.

However, if Derby were orange in Fig 11, then it appears that a “pink” East Midlands regional multiplex covering Derby, Nottingham and Leicester may be possible. If interference with the pink area marked A2 was problematic, then perhaps Lincoln and North Norfolk may be switched (pink to orange; orange to pink) and an “orange” east Midlands multiplex might be assigned.

I appreciate that my “colour-by-numbers” is no more sophisticated than a patchwork quilt, and that the precise technological solution requires detailed engineering planning. However, my point still stands: without a strategy or priority for the establishment of further regional multiplexes **at this stage of planning**, then it will be impossible at a later date to shoehorn them in – the opportunity will have been lost. That cannot represent the optimal use of the spectrum.

Therefore, to conclude:

Please take into account the planning necessities for as many further local/regional multiplexes as technically possible, at the same time as you finalise the local multiplexes for white areas.

Please prioritise for regional multiplexes, those areas which support existing regional FM stations, yet which were not granted regional DAB multiplexes up until now.

Thank you

Michael Cook