

Response to Band III consultation

To directly answer the question: No I do not think that this is the correct answer given the evidence presented. In my opinion the priority should have been given to two national multiplexes, with three local multiplexes being conditional on five blocks being available.

My reasoning for this is as follows: -

1. As stated above in 6.1.69, there are already seven radio stations likely to want carriage on a new national multiplex. Given that the multiplex will be only likely to have 80% of its available capacity available for radio services, this allocation is likely to be full immediately offering little possibility for any new entrants or further diversity. This will instantly discourage broadcasters from increasing bit rates because there will already be strong competition for all of the available bandwidth.
2. This report has ignored the fact that the BBC has sufficient programme material to fill another national multiplex on its own. Limiting the access by the BBC to national bandwidth will limit the effectiveness of the BBC to raise standards by setting an example that the other broadcasters should be aiming for. No commercial broadcaster will set itself a target higher than the BBC. If the BBC takes capacity on a new commercial multiplex it will further exacerbate the situation in point 1 above.
3. The example map in figure 10 shows that provision of an extra local multiplex frequency above two provides very minimal benefit to a potential minority of listeners.
 - a. In central England it will provide increased granularity in an area where the BBC already considers it necessary to pool its services much of the time (BBC Three Counties Radio?).
 - b. In the more rural areas such as Yorkshire, Southern Scotland and Wales there is probably unlikely to be sufficient demand for services to preclude carriage of several local services on a large area multiplex. This is no different to the challenge faced by community stations and should be approached in the same way. This should be resolvable in the future when more spectrum becomes available and does not necessarily have to be dealt with today.
4. In order to provide an extra national multiplex later, it will be necessary to clear the frequency nationally of incumbent services, a substantial and long-winded task. To provide extra local services in order to provide a frequency (or frequencies) to split the example problem areas in figure 10 it may be possible to share a frequency with other services which are unlikely to be used in these areas. For example PMR, which will not coexist with T-DAB in close proximity, can easily be restricted to certain parts of Band III in the rural areas shown as being a problem because they are well away from major urban areas where PMR requirement will be high. As is stated, Band III is a broadcast band in the rest of Europe and any non broadcast use of Band III is going to have to be able to co-exist with out of area broadcast use anyway. T-DAB is

unlikely to cause co-existence problems anything like the current analogue TV use in Europe.

5. While providing large area local services on L Band is not ideal, it is far preferable to providing national services on L Band (except for by satellite, but I think this is out of scope of this consultation). If no more Band III spectrum can be released, L Band spectrum should be considered at the earliest opportunity for extra local services.

There are many other areas that will be able to take advantage of L Band being available, as an example the Colchester and Tendring area. This area currently contains three local analogue services (BBC Essex, SGR Colchester and Dream 100) broadcast from three transmitter sites (Maningtree, Wivenhoe Park and Tendring). These three sites would be ideal to provide an L Band multiplex covering the whole area and may be able to obtain extra revenue from carriage of Essex FM and Classic Gold Breeze which are also available locally on analogue. As soon as a critical mass of listeners expects the benefits of DAB broadcasters will no longer want to use analogue and save on simulcast costs, as broadcasters no longer have any interest in simulcasting on medium wave AM.

6. Ofcom has a responsibility to provide a migration path for those services currently wasting bandwidth on the Freeview platform. There is currently an imbalance where Freeview receivers are available cheaper than DAB radios, and highly valuable DVB-T bandwidth, equivalent to a whole DVB-T multiplex is being used for radio services when TV broadcasters are having to decide which TV service to drop in order to introduce a new one. By providing an effective DAB service with good coverage and sufficient bandwidth (bit rates) there will be no reason to retain radio services on the Freeview platform, increasing the take up of DAB, in the interests of listeners, broadcasters and multiplex operators.

I give my view as a radio listener, concerned about both the variety of programming offered (I will probably be satisfied when my taste of radio station is available but not yet, of the seven multiplexes I can receive locally, none carries country music and when I am commuting in the car all the speech programming is either news or children's programmes) and of the audio quality available on the current services, especially those using excessive compression.

I have been a regular DAB listener for three years.

Paul Harman