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Re: Radio – Licensing Policy for VHF Band III, Sub-band 3

Dear Peter

No, we don't believe these proposals represent the optimal use of the spectrum.

Other, more advanced, digital technologies are already being deployed in other countries and the opportunity to implement them in the UK will be missed if more spectrum is squandered on the current form of DAB, an outdated system.

Our view that the current implementation of DAB in the UK is outdated is borne out by the experience in other countries. Finland closed down its DAB services in February 2005 and the MABB in Germany stopped issuing DAB licences in January 2005 on the grounds that 'outdated' technology has been superseded. In the Republic of Ireland the regulator, ComReg, has stated: 'It may therefore be prudent to leap-frog the Eureka 147 DAB system and implement newer technologies'.

In July 2005, CSA, the French regulator, published the results of their public consultation on digital radio. The four largest broadcasters, Radio France, NRJ, RTL and Lagardère, all rejected the DAB system and suggested alternatives. French transmission provider, TDF, provided a technical overview and pointed out that newer digital radio systems are ten times more efficient in the use of spectrum than DAB.

In many cases DAB as currently implemented in the UK is not able to provide as good a quality of sound as is already available with FM stereo. The 128 kbps bit rate for MP2 has been classified as "annoying" in research by Dr. David Robinson, at the University of Essex Audio Research Laboratory. Many DAB stations don't even provide 128kbps.

As DRM becomes a world standard, both for better-than-AM quality and, in due course, better-than-FM stereo quality, we believe that the UK must create a viable band for use for digital transmissions by small, local commercial, community and RSL stations. 26 MHz is not a suitable band for domestic, local radio DRM transmissions due to its many well-documented drawbacks. DRM on the AM broadcast band is already becoming a generally accepted transmission standard in many countries around the world and will provide a very useful path to digital for stations unable to use DAB as currently implemented in the UK. However, in the long term a DRM service providing a service of equivalent, or better-than-current FM stereo quality, will be required. Capacity in VHF Band III for DRM could allow this to develop.

Then there is the matter of competition. Page six of your consultation document highlights Ofcom's duty to act in accordance with European principles to promote competition and to be technologically neutral.

Radio Jackie believes that the way DAB is being implemented in the UK is inherently anti-competitive in its reliance upon multiplexes – particularly when the multiplexes can be controlled by just a handful of companies. To ensure diversity of content on the commercial airwaves broadcasters, including independent operators, should be able to own and operate their own transmission facilities, as is the case with broadcasting today.

On page 13 of the consultation document you say that Ofcom needs to “ensure a wide range of services in the commercial sector and, in particular, the provision of local material”. Implementing more DAB multiplexes, whether three or four blocks of spectrum are allocated to local multiplexes, will result in less local material and less diversity of ownership. This is because DAB multiplexes cover much greater geographical areas than many local FM services, and small commercial and community radio stations are excluded from the DAB multiplexes owned and operated by a handful of large commercial radio operators.

In conclusion we suggest that instead of allocating more of VHF Band III spectrum for DAB in its current outdated format, attention is given to allocating spectrum to alternative, more modern and spectrally efficient digital technologies, including, version 2 DAB and DRM.

Yours sincerely

Peter Stremes  
Managing Director