# Name and title under which you would like this response to appear: 

Mr M Barraclough

## Representing:

## Self

## What are your comments on these proposals?:

## Proposal 5:

I am against Proposal 5 and any reduction in DAB sound quality, Ofcom should be seeking, over time, to improve sound quality on DAB as well as all other forms of digital broadcasting.

The research Ofcom has conducted into DAB sound quality is statistically unsound. The sample size the researchers have used is quite small, 917 (677 according to section 5.150 ?). It is also a self selecting sample consisting of people who have bought DAB receivers, and does not represent the general public. Many will have been influenced by the advertising, telling them of crystal clear sound quality, and may well have a positive view of DAB generally because they like the ease of tuning and because they listen to stations such as Planet Rock and BBC7 which they can't get on FM.

Opinions of DAB sound quality will vary as to which station you listen to, where and how actively, some radio listening is done quite passively with the radio on in the background while you are doing other things, so your expectations of sound quality on those occasions tend to be lower. On other occasions, for example the increasing number of live music concert broadcasts in all genres, there is a higher expectation of sound quality. Listeners who criticise DAB sound quality should not be labelled as audiophiles, they have, in the main, bought higher priced DAB sets and found that they are getting worse quality sound than they were previosly used to or had been led to expect.

Sound quality of DAB stations varies, even within stations with the same bit rate, which the research does not take into account, it just asks a generalised question.

The DAB owners surveyed may well have replaced a cheap FM set with a more expensive DAB one with better speakers and sound quality overall.

In paragraph 5.158 it is admitted that the general public confuses sound quality with reception issues which invalidates some of the questions asked. It is then stated that you wanted to further test this only with the respondents who rated DAB sound quality as worse than FM, stating that this might be because they had DAB reception issues. You then say as there weren't many of them we won't bother! Reception issues could apply to anyone surveyed, there will be respondents who say that DAB sounds better than FM because their FM reception is poor. Why did Ofcom only seek to assess the reception issue with a small number of their sample?

Many people who have bought a DAB set will only listen on DAB, and indeed $27 \%$ of the sample had two or more sets, so to ask them whether the sound quality is better or worse than FM is again biased. They may well have forgotten what FM sounded like and, as stated previously, could well have been using FM sets with poorer
speakers or have had FM reception problems.
There is an easy way to test the general public's opinion on sound quality, a blind listening test. Set up various types of receivers, portables, hi-fi, walkmans etc in an area of perfect DAB and FM reception, ask a representative sample of the general public, not DAB set owners, to rate the quality of Radio 3 DAB, Radio 3 FM, Radio 2 DAB, Radio 2 FM etc but don't tell them whether they are listening to DAB or FM, so removing any bias as well as the admitted confusion between sound quality and reception. Mono DAB music stations operating at low bit rates should also be included.

I have a Roberts RD20 which has good stereo speakers and have good reception of BBC National stations both on DAB and FM. You can tell the difference straight away between FM and DAB on the BBC stations, to me FM is a lot better sound quality

Even given statistically unsound research 17\% of DAB receiver owners rate sound quality of their DAB radio, which of course is not the same as rating the sound quality of DAB, yet another example of an unfair question, as average or poor, why is this acceptable? Even if you accept this research, which I don't, and project that to the general 15+ radio listening public that's nearly 8 and a half million people.

The BBC wishes to improve the sound quality of its current DAB services:
At present, the BBC is required to compromise over the configuration of our multiplex due to capacity constraints. For example, if Five Live Sports Extra is on air at the same time as a Radio 4 LW split, as is happening during the current England cricket tour of Pakistan, we are unable to broadcast Yesterday in Parliament and Daily Service. There is insufficient capacity for all services to be delivered in stereo and even Radio 4, broadcast in stereo on FM, has to be taken down to mono fairly frequently when Sports Extra is on air. While compromises such as these are tolerable while FM predominates, we have never regarded them as acceptable in the long term, as analogue sets are displaced or in the event of switchover. The question of audio quality, which has already become an issue in some areas, is likely to become more pressing in the long term as DAB alongside other digital platforms. Sound enhancements, such as 5.1 surround sound, will become more widely available and even expected by listeners, leaving the BBC unable to meet those expectations in the current situation. ? (BBC response to Radio: Licencing Policy for VHF Band 3 - Sub Band 3, 16 November 2005)

It is also stated that transition to DAB+ will not necessarily improve sound quality, certainly the BBC wish to do so. There is a limit to the number of commercial radio services that are viable and I would contend that it is likely that a switch to DAB+ would result in the opportunity to transmit more radio services, for them to be at higher quality, and for multiplexes to be more financially viable due to the costs being shared between a greater number of users, including data services.

Currently on Digital One The Jazz transmits in mono. Gcap have announced in their latest preliminary results statement that they have made the decision to discontinue the Capital Disney station and cease investment in the digital stations, Core and Life.

It is absurd for multiplex space to be taken up by music stations with hardly any audience and no investment transmitting in mono and thus preventing a station offering a distinct service, and which is being invested in, being transmitted in stereo. Rather than allowing DAB stations to transmit in mono Ofcom should be working towards all DAB stations transmitting in stereo through a combination of a transition,
over time, to DAB+ and scrapping the rule where multiplexes have to carry a certain number of services when it is clear there is no demand for those services and where operators of them are neither publicising or putting any investment into them.

