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**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Additional comments:**

**Question 1: Do you agree with our approach of matching DAB to FM within defined editorial areas? We will seek comments on specific**

**editorial boundaries via separate consultations if and when specific changes are proposed.:**

Broadly, Ofcom should aim to ensure that listeners can continue to receive the same services on DAB as they are able to receive on FM and AM. In order to achieve this, Ofcom would need to match current FM coverage, including incidental coverage from very high power analogue transmitters into adjacent regions although this could be difficult to achieve on DAB in some areas. For this reason, we agree with the approach of matching coverage within editorial areas but not to lose sight of any opportunities to provide DAB to areas that do not currently have good FM coverage due to scarcity of suitable frequencies on Band II.

**Question 2: Do you agree with our approach to determining the extent of existing FM coverage, and which of the three field strength levels should be used to define the FM coverage that DAB should match?:**

Yes - the computer models used to plan DAB and FM networks have undergone many years of development and closely match the results of surveys and listening tests.

In practice, coverage is affected by interference and terrain at the fringes of coverage and therefore the practical difference between using 42dB $\mu$ V/m and 48dB $\mu$ V/m is not as great as may be expected, particularly within an editorial area. We believe that the conventional threshold of 48dB $\mu$ V/m should be used in most cases.

**Question 3: Do you agree with our approach to determining the extent of existing DAB coverage, and its relation to the approach we take for FM?:**

See answer to question 2

**Question 4: Are the assumptions we make about needing to predict DAB in-vehicle coverage for 99% of the time and for 99% of locations the right ones?:**

This is a very stringent threshold and experience suggests that adequate in-vehicle coverage is achieved with a slightly relaxed standard.

We suggest that further testing be carried out to help justify any relaxation of the assumptions.

**Question 5: Should the principle of merging editorial areas be explored, as a way of improving coverage?:**

Merging editorial areas may cause problems for commercial radio stations that are currently able to split their output to individual FM transmitters. Whilst services are simulcast on analogue and digital platforms, this may not cause significant problems but should be considered to be a temporary solution until DAB becomes the primary delivery platform.

**Question 6: Above and beyond the frequency changes proposed in this document, should further changes to frequency allocations be explored, as a way of improving coverage?:**

Changing the frequency of networks that are already in operation is expensive and will cause confusion for some listeners.

We would urge Ofcom to consider and plan for only the necessary changes to be carried out and for these to be coordinated to ensure that listeners are aware of any action they might need to take to retune their radios.