

Organisation (if applicable):

AT Consultancy

Additional comments:

Question 1: Do you agree with our proposals for amending the Digital Radio Technical Code in relation to DAB+? Do you have any views on how we propose its use will be permitted?:

YES

Question 2: Do you have any comments in relation to our proposals to amend the planning standards?:

The current situation where only the BBC and Arqiva have access to the UKPM (the de-facto planning standard) is unsatisfactory and I believe unnecessarily enhances Arqiva's monopoly. This could be in breach of the Competition Commissions rulings when agreeing to the merger of Arqiva and NGW.

Other than the above I have no questions on the proposal.

Question 3: Do you have any comments on our proposed approach to Unequal Error Protection and Equal Error Protections?:

NO

Question 4: Do you agree with our proposals in relation to management of Adjacent Channel Interference?:

YES

Question 5: Do you agree with our proposals for amending the Digital Radio Technical Code in relation to multiplex capacity allocation? Do you have any alternative suggestions?:

YES although there would appear to be an inconsistency in the wording which in para suggests that subjective audio quality should be consistent with "reasonable" expectations. Whereas in para 5.14 reference is made "high" standards of technical quality.

Question 6: Do you agree with our proposals in relation to the management of TA/TP features on DAB? We are particularly interested to hear any views on issues that could affect implementation of these proposals.:

YES

Question 7: Do you have any additional comments on either the draft Digital Radio Technical Code or Technical Policy Guidance note?:

YES.

1. Section 4 of Annex 6. With the removal of all mandatory bit-rate requirements as proposed would not now be the time for Ofcom to remove its objections to the use of the Variable X-Pad facility? As long as the subjective performance of the audio is not adversely affected it seems inconsistent to continue the prohibition on the use of this very useful facility.

2. Use of Tii. As I read the Ofcom documents there is no mandatory requirement for the use of the Tii function. If however Tii is in use in a given network and there is a desire to extend network coverage by use of the OCR technology would it be acceptable for the Tii output of the OCR to be suppressed to avoid confusion? If this was not deemed possible the use of this very useful and highly cost effective solution to enhancing coverage may be adversely affected?

Question 8: Do you have any other comments to make on any of the matters raised in this consultation?:

NO