

## **Organisation (if applicable):**

Digital Radio UK

## **Additional comments:**

Background &ndash; Minimum digital radio receiver specifications and the digital radio tick mark

1. Digital Radio UK works on behalf of The BBC, Global Radio, Bauer Media, Arqiva and Communicorp, with representation from the Society of Motor Manufacturers and Traders and techUK, to drive digital radio listening.
2. Between July 2010 and December 2013 DRUK worked with Government, Ofcom and industry on the Digital Radio Action Plan (DRAP). Specifically, DRUK chaired and led the work streams looking at Market preparation and Technology and Equipment.
3. As part of its work, the Technology and Equipment Group developed a set of minimum receiver specifications for digital radios (for use in-home and in-car). The intention was that products that met these specifications would be able to carry a digital radio &ldquo;tick mark&rdquo; that would provide reassurance to consumers that the product they were buying would deliver a minimum level of performance.
4. In December 2013, Minister for Culture, Communications and Creative Industries Ed Vaizey MP, announced that DRUK would be speaking to industry about launching the tick mark. Consequently, DRUK will be licensing the tick mark for use in the market from June 2014. It is our expectation that products carrying the tick mark will start appearing in the market in Q4 2014.
5. DRUK is responding to this consultation in it&rsquo;s role as the administrator of the digital radio tick mark and the minimum digital radio receiver specifications.
6. The minimum specifications (see appendix 1) cover a number of requirements for receivers including the following areas:
  - a. FM, DAB and DAB+
  - b. A specified level of receiver sensitivity
  - c. Adjacent channel interference
  - d. Easy re-tuning
  - e. Service-following and traffic announcements (in-vehicle only)
7. It is of critical importance that the technical code and the minimum receiver specifications are aligned, and together help deliver a good experience for listeners. As Ofcom points out in the introduction to this consultation, the technical code seeks &ldquo;to ensure interoperability with other services and receivers.&rdquo; To this end, Ofcom and broadcasters were closely involved in the development of the minimum specifications, ensuring that the level of receiver sensitivity matched the planning assumptions for DAB coverage.
8. We recommend that Ofcom, as owners of the broadcast digital radio technical code, should be members of the Approved Product Group which will oversee the minimum receiver specifications and the use of the tick mark on receivers. We also recommend that Ofcom, alongside DCMS, review the minimum specifications annually to ensure they are aligned to the technical code and are delivering the right level of performance.

**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?:**

9. DRUK strongly supports the proposal to include DAB+ in the technical code and as an option for the second national commercial multiplex for the following reasons:

10. DAB+ is part of the UK minimum receiver specifications &ndash; DAB+ has been included in the minimum specifications to grow the installed base of DAB+ receivers so future DAB+ services can be launched and accessed by consumers. We agree with Ofcom that any introduction of DAB+ services would need to be carefully managed. However, there are benefits in starting to grow the number of DAB+ receivers in the market and providing consumers with a clear &ldquo;future-ready&rdquo; message through the tick mark.

11. Including DAB+ in the technical code provides important clarity and confidence to the manufacturing supply chain about the future potential for DAB+ services in the UK &ndash; Including DAB+ in a digital radio costs around \$1 royalty per radio for manufacturers. For UK retailers manufacturing their own digital radios, and not selling products across Europe or making products for cars, it is important that Ofcom provides the provision for broadcasters to launch DAB+ services. This gives a clear signal to the supply chain and will help to justify the investment in DAB+.

12. DRUK believes that across the rest of the digital radio supply chain there is a high adoption of DAB+. In the domestic sector all the leading radio brands including Roberts, Pure, Sony and Philips all include DAB+ across their range. Feedback from vehicle manufacturers confirms that new cars with DAB include DAB+ and the majority of aftermarket radios and adapters also include DAB+. Further work is being done to assess the DAB+ installed base but feedback from the supply chain suggests it is currently around 4 Million (domestic and in-car).

13. DAB+ is now part of a European minimum standard and there are industry and consumer benefits in the UK being aligned &ndash; Countries such as Germany, Denmark, Sweden, Switzerland, Belgium and The Netherlands have either launched or are planning the launch of DAB+ services. Digital radio manufacturers selling products across the European market now use a single multi-standard chip for all countries, including FM, DAB and DAB+, creating economies of scale which will ultimately benefit the consumer. Common European standards are particularly important for vehicle manufacturers as cars move across borders.

14. A 30% limit on the use of DAB+ has been proposed. The intention of setting the limit is to ensure that the introduction of new DAB+ services are commensurate with the installed base of DAB+ receivers and that this will ensure a gradual, managed introduction of services. However, DRUK believes that no limit should be put in place and that the multiplex owners and broadcasters should be left to decide how and when to introduce DAB+. Commercial reality and the need to reach listeners will ensure that the introduction of DAB+ will happen when listeners are ready.

15. The importance of the second national commercial multiplex should also be noted. FM and Digital One are now full which limits the ability for commercial radio to launch national services. The new multiplex will enable the launch of new commercial stations, facilitating greater competition and bringing more choice for listeners.

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

16. Digital Radio UK supports the proposed amendments as they are consistent with the planning assumptions made to define the minimum receiver specifications.

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

17. The minimum receiver specification currently includes for all values of UEP and EEP.

UEP3 and EEP3A are used as benchmarks for minimum sensitivity. DRUK understands that this is consistent with Ofcom coverage planning assumptions to achieve FM Equivalence.

18. However, while we want to provide stability for the receiver market, multiplex operators and broadcasters will want to retain flexibility they currently have with protection levels. This is because listeners do not expect all radio services to have identical coverage and the proposals could unnecessarily restrict the range of content services that could be made available.

19. DRUK requests that any changes to the protection level requirements that could have an impact on the minimum receiver specifications are raised with the Approved Product Group

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

20. We agree with the proposals on ACI based on the assessment that the impact of ACI from new sites has been overestimated. The minimum specifications require receivers to block ACI to a certain level which should help the listener experience.

21. Digital Radio UK would also like to request that Ofcom provide a list of known sites where ACI is an issue. If reception problems occur in-car it would be useful for receiver manufacturers to understand if the possible cause as quickly as possible.

**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?:**

**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.:**

22. Digital Radio UK supports the proposals. The minimum receiver specifications have tried to ensure that the FM experience is at least replicated, if not improved, on DAB. This proposal ensures that will be the case for traffic news and announcements.

23. The minimum receiver specifications require receivers to be able to handle switching to DAB traffic announcements should the listener wish to do so. Further to that, in 2012 Digital Radio UK worked with broadcasters, transmission providers and receiver manufacturers, testing TA/TP on DAB to help ensure compliance with the specifications.

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

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

24. We would like to note that any further changes to the broadcast technical code could have an impact on the minimum receiver specifications and ultimately the in-vehicle consumer

experience of digital radio. There is a process in place to administer change requests for the minimum specifications and hope that through Ofcom's membership of the Approved product Group that any changes could be identified and processed as quickly as possible.