Organisation (if applicable):

Global Radio

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?:

We agree that the second national radio multiplex should be allowed to carry DAB+ services as proposed. However, as a change to DAB+ would be a longer-term transition as there are currently likely to be a large number of receivers in use that cannot receive DAB+, we do not believe that in its assessment of applications for the second national radio multiplex licence Ofcom should favour applicants intending to carry DAB+ services. The fact that an applicant offering DAB+ services would, on paper, be providing more services (and therefore might be considered to provide a broader range of services), would need to be balanced against the fact that many existing DAB listeners would not be able to receive these services.

The consumer take up of DAB+ capable receivers should be able to effectively self-regulate the introduction of DAB+ to all multiplexes.

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

We agree with the proposal.

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

We agree that coverage planning assessments should be carried out on the basis of UEP3 being used. However, we do not believe that further regulation of error protection levels is required. In some cases multiplex operators and service providers may feel they should use a higher or lower protection level and it will be in their interests to self-regulate the balance between coverage and capacity allocation.

The vast majority of DAB services are broadcast at UEP3 and therefore is makes sense for coverage planning assessments to be based on this level of error protection but that is not a reason to prevent services that wish to broadcast at other error protection levels from doing so.

Introducing new regulation of error protection levels is not necessary and is not consistent with the regulatory principles set out elsewhere in the consultation. It would be irrational to give multiplex operators and service providers flexibility to determine bit rates for services while at the same time introducing new regulation of error protection levels.

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

We agree with the proposal.

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?:

We agree with the proposal. We believe the market can effectively regulate multiplex capacity allocation. Individual service providers would choose the bitrate appropriate to their particular audio requirements. It would not be in the interests of any service provider to broadcast at an audio quality lower than the expectation of the majority of their listeners.

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.:

We agree with the proposal regarding utilisation of the TA/TP flag. Furthermore, we strongly believe that all multiplex operators should be obliged within the Digital Radio Technical Code to support TA/TP on their multiplex. In addition, the Technical Code should require multiplex operators to support Service Following in accordance with ETSI TS 103 176v.1.1.2 (2013 - 07) as also described in the Minimum Specifications For DAB And DAB+ In-Vehicle Digital Radio Receivers And Adaptors published by DCMS.
Whilst these features may not be of relevance to all service providers, multiplex operators should support these features for service providers wishing to use them.

We believe that regulation of multiplex signalling is essential to the successful future of the local DAB multiplexes. This would bring consistent functionality to DAB and enhance the consumer experience. It would also bring equivalence to FM broadcasts and help ensure DAB's competitiveness against other platforms.

We understand that the industry will have the technical capability to support this functionality during the second half of 2014.

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

We would like to comment on the regulation surrounding Hard and Soft Linking (Annex 6, s.4.5). The current wording prevents Soft Linking when Hard Linking is active, and we think that this may inadvertently impose a significant overhead in the management of signalling for linking. In the case of Heart, we intend to enable a Soft Link set including all the Heart services. This would be relevant and appropriate at all times. We would then define and activate a Hard Link set to link together Heart stations when they are transmitting identical programming. At the transition between identical and non-identical programming (such as news, ad-breaks, promotions, local programming), we would be required to explicitly disable the Hard Link set and enable the Soft Link set, which doubles the capacity required for signalling, and delays the updating of the linking information. In this case, we would prefer that Soft Link sets can be defined and active at all times, as long as the service is also part of a Hard Link set which is active for a significant amount of time each day.

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

No