

UTV's response to the consultation questions are as follows:

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 Digital Radio Technical Code (the "DRTC") be amended to include DAB+. However, we believe that any limit on the proportion of multiplex capacity that a multiplex operator allocates to DAB+ services would be arbitrary, and therefore that no limit be set by Ofcom.

We believe that service providers are best placed to make the commercial judgement as to the merits (or otherwise) of whether or not to launch new services using DAB or DAB+, or indeed switch from DAB to DAB+ (or visa versa). We therefore believe that this decision be left to the market and Ofcom removes the requirement for existing DAB services to gain consent to switch to DAB+.

Furthermore, we believe that the ability to allocate multiplex capacity to DAB+ services should apply to all existing digital radio multiplexes (not just the second national commercial digital radio multiplex), as many local multiplexes could use uncontracted capacity for new low cost DAB+ carriage offers to bring new services on-air, which would support the development of the platform in the United Kingdom.

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

We do not have any comments on the revisions to the planning standards.

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

We do not agree that the use of UEP or EEP needs to be regulated as service providers are best placed to make the assessment of the impact of moving from one protection level to another. Furthermore, we strongly believe that the proposal to address any loss of coverage by building new transmitters is totally disproportionate. While we do not have access to the UKPM to assess the difference in coverage at say UEP3 as opposed to UEP2, we understand that the difference is marginal and on the fringes of coverage. To therefore address lost coverage with additional transmitters may therefore require several new sites being brought into a network, resulting in significant increases in cost and may result in a mux becoming unviable.

In UTV's experience, whilst most service providers elect to broadcast at UEP3, there have been some instances where service providers have elected to utilise spare contracted capacity they may find themselves holding by moving up from UEP3 to UEP2. We believe this type of activity is commercially sensible, and these services should not be penalised when they decide to move back to UEP3.

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

We agree with the proposals.

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 proposals.

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 proposals.

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

No.

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

No.