Question	Your response
Question 1: Do you agree with our proposed changes to the ACI/blocking procedures?	The interest levels reported by Ofcom suggest that upwards of three hundred multiplexes could be licensed and many may need to provision several transmitters. The ACI process as currently proposed is unlikely to be workable as it introduces bottlenecks and potential abuse by existing 'legacy' multiplex operators - who are effectively invited to stifle their only minor competition. The process used for the trials was much simpler than this and we understand that none of the transmitters caused blocking or interference. It is unclear why the simple, proven and workable process used for the trial needs to be replaced with a complex, untested, slow and bureaucratic one.
Question 2: Do you have any comments on the adoption of the new ETSI mask characteristic and on the potential use of the non-critical spectrum mask?	The relaxed mask should be allowed for all uses where it would work without causing problems to listeners or users of nearby channels.
Question 3: Do you agree with our proposed changes on DAB+ audio encoding?	We consider multiplex operators should be able to offer DAB+ as the default and able to offer different levels of error protection depending on the specific needs of the service.
Question 4: Do you agree with our other proposed revisions to the Digital Radio Technical Code outlined in Section 6 of this document? Do you have any views on alternative models for dealing with the administration of Sid and TII codes?	It should be permissible for multiplex operators to deploy any permitted AAC Profile for DAB+ services. Multiplex operators should respect the MCI rates as set out by the most recent version of the ETSI publication. We believe that Ofcom should continue to centrally administer all of the relevant codes. We believe that mixed polarisation would create problems and solve none. We can uses for slant polarisation but modelling suggests that it could make blocking more likely. We believe that evidence should be collected and studied before making a decision on this detail.
Queston 5: Do you agree with our other proposed revisions to the Technical Policy Guidance for DAB Multiplex Licensees document outlined in Section 7 of this	It should be possible for multiplex operators to determine audio parameters based upon the requirements for individual services.

document?	