

Your response

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Question 1: Do you agree with the proposed broadcast licensing priorities for the short to medium term? Please give reasons for your answer.	Confidential? –N Short-term: Yes Medium-term: I think there is potential demand for a third national commercial DAB multiplex in the medium term. Both national commercial multiplexes are usually full and have transitioned more of their capacity to DAB+ to accommodate more services. Moreover, there are several quasi-national services broadcasting across multiple local multiplexes (not counting services with local news and adverts). This would suggest there is demand for additional capacity. Thus, Ofcom should be looking at clearing spectrum for it now (see Q6) Ofcom might also consider ending short-term RSLs on FM in areas served by SSDAB
Question 2: Do you consider that the proposed broadcast licensing priorities for the short to medium term will provide sufficient provision for audiences? Please give reasons for your answer.	Confidential? –N In most places, a single layer of local multiplexes (enabled for DAB+) and a single layer of SSDAB multiplexes should provide sufficient capacity to provide for localised tastes, both mainstream formats with a local/regional flavour and specialist formats with geographically concentrated audiences. Thus focussing on increasing the coverage of these layers is the right approach. However, additional spectrum maybe needed for SSDAB coverage to meet demand everywhere (see Q6) There are a few places, such as Manchester and Birmingham, where I think a second layer of local multiplexes might be needed to meet demand, but again, spectrum may be a problem (see Q6). However, minority tastes that are geographically widespread can be served more efficiently by national multiplexes. Thus, these audiences would be better served if an additional national multiplex was provided. Moreover, moving quasi-national services off local multiplexes would create more space on those multiplexes. Note also my comments above.

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Question 3: For post-launch SSDAB multiplex coverage improvement or extension requests only, do you agree with our proposed change in approach to our application of the rule which restricts overlap with local muxes to 40% of the population already covered by the local mux (the “40% ceiling”)? Please give reasons for your answer.	Confidential? – N Yes – The 40% constraint has led to unnatural coverage areas in some places, such as splitting relatively small cities in two. I also think that larger ceilings are more appropriate where smaller populations are served.
Question 4: Do you agree with Ofcom’s analysis in section 3 and at Annex A1 of the existing broadcast licence types? Please give reasons for your answer.	Confidential? –N I believe that Ofcom needs to increase the spectrum allocated to DAB in order to meet audience demand. See Q6 below. In the case of FM, more spectrum could be made available for community (or local) services by ending short-term RSLs in areas served by SSDAB. Short-term RSLs are a highly inefficient use of spectrum.
Question 5: Do you agree with our assessment on the impact of our proposed broadcast licensing priorities for the short to medium term at Annex A3? Please give reasons for your answer.	Confidential? – Y / N No comment
Question 6: Do you have any other comments to make on the proposals?	Confidential? – N VHF Band III Spectrum in the UK is shared mainly between DAB, private mobile radio (PMR) and programme making and special events (PMSE). However, PMR and PMSE use of Band III is declining, partly as it is internationally non-standard, whereas for DAB, there is insufficient spectrum to meet perceived audience demand (see Appendix A1 of Ofcom’s consultation document and my comments above). Thus, I believe that Ofcom needs to start the process of reallocating a number of channels from PMR and PMSE to DAB as soon as possible: • A channel for a new national commercial multiplex needs to be found within the current PMR

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	allocation (5C to 7B) as neighbouring countries have generally avoided these channels in coastal areas to protect against UK PMR interference, so obtaining international clearance for national UK DAB would be easier. • A channel to enable the BBC National multiplex to split into England, Scotland, Wales and Northern Ireland versions. This would probably also need current PMR spectrum. • Two (possibly more) channels to support a second local DAB multiplex in key population centres plus further development of SSDAB. These could be either PMSE or PMR channels. <i>(Within existing spectrum, an additional multiplex for Birmingham might be accommodated on channel 10D, but coverage would likely be more limited than the current Birmingham multiplex. An additional multiplex for Manchester would require SSDAB changes with East Cheshire moving to 9A to free up 11C and Congleton/Leek moving to 9C, which Mid Cheshire plans to vacate.)</i> In addition, I think it is time to move away from the current polygon model for SSDAB. There are significant places, such as Inverness and Hereford, that do not have a polygon allocated to them. There are current SSDAB multiplexes that only serve part of their polygon. Operators may also wish to broadcast to unserved areas that straddle polygons. Thus, I think a more flexible approach is needed going forward. Additional DAB spectrum would support this.

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