

Title:

Mr

Forename:

John

Surname:

Sutton

Representing:

Self

What do you want Ofcom to keep confidential?:

Keep nothing confidential

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Overall the whole exercise in my view is a negative for listeners and is now primarily a face saver for Ofcom and cost-saver for the broadcasters .

It provides inferior service and involves scrapping perfectly good equipment that can currently be used worldwide: Any switch should be put on hold as long as the UK sticks to DAB using MP2 - an inferior system - unless there is a corollary requirement for maintenance of a basic national FM service (See point 4).

Ideally for the benefit of the millions of Britons who travel -often by road to Europe - there should be no switch-off until there is Europe-wide agreement on a "World" (I except iBiquity's HD from this) receiver at a reasonable price to handle current FM/AM/SW plus DAB+ (which will handle DAB), DRM and any other systems in use in Europe.

The commercial industry should be allowed to decide if and when to switch on the basis of its financial calculations with FM frequency attracting only a nominal charge if full (100%) DAB cover including reception in automobiles is available within a licence area with this frequency provision given precedence over increasing community station cover (often available online anyway for those listening from a fixed location).

Question 1: Do you agree with our approach of matching DAB to FM within defined editorial areas? We will seek comments on specific editorial boundaries via separate consultations if and when specific changes are proposed.:

In general yes albeit the news cover on many commercial channels often renders this irrelevant.

However no change should be made until DAB offers an equivalent traffic warning system to that currently on FM.

Question 2: Do you agree with our approach to determining the extent of existing FM coverage, and which of the three field strength levels should be used to define the FM coverage that DAB should match?:

Again broadly but from a motorists' point of view what matters is the actual reception -- poor quality FM and FM provide information even if difficult to listen to as opposed to digital disappearance of signal.

Question 3: Do you agree with our approach to determining the extent of existing DAB coverage, and its relation to the approach we take for FM?:

Yes but - See 4 below re retaining basis legacy FM and AM services to cover remote areas.

Question 4: Are the assumptions we make about needing to predict DAB in-vehicle coverage for 99% of the time and for 99% of locations the right ones?:

No it should be 100% or there should be a requirement for legacy coverage of at least one national news/speech channel and one music channel to remain on FM and or AM (maybe BBC Radio 4 & Radio 3 on FM (unless the bit rate of DAB is to be mandatorily increased up to at least 256 kbps), Radio 5 Live on AM and Classic FM and Absolute on M and AM respectively as long as the operators of the latter wish to maintain the signal. For this spectrum there should be no charge.

Question 5: Should the principle of merging editorial areas be explored, as a way of improving coverage?:

Yes YES

Question 6: Above and beyond the frequency changes proposed in this document, should further changes to frequency allocations be explored, as a way of improving coverage?:

YES