Title:

Mr

Forename:

Philip

Surname:

Dodd

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:

The hilly areas of the Western Midlands, known as the Marches, have always proved that the original approach to broadcasting DAB, from regional TV transmitter towers, was flawed. The signal went over our heads, to be received by people living around the base of the next TV transmitter. So Ridge Hill in SE Herefordshire would provide signals for Gloucestershire and mid-Shropshire, but not most of Herefordshire. Correspondingly the Wrekin transmitter can be picked up in north Herefordshire, but not in parts of the car park of the Telford shopping centre, adjacent to the Wrekin.

It is excellent news, therefore, that your current plan is to build a network of low-powered transmitters. Currently, you're considering these as in-fill; you have no alternative but to do this if DAB is ever to give good coverage. You need to go much further, though, with that idea of a network.

Firstly, do away with high-powered DAB transmitters on regional TV towers and the like. This will solve the problem of DAB transmitters interfering with adjacent regions, or with

transmitters at the other end of the same region, as described in your plan.

Secondly, cover the whole of a region using a network of low-powered transmitters. There is nothing to stop these being environmentally green, by being solar-powered. No transmitter would ever be powerful enough to interfere with another one through being so far away as to be out of sync as regards time frames. The network of DAB transmitters would be considered cellular, sharing transmission towers with mobile phone cell transmitters. This will give valuable cost-savings on the infrastructure.

These transmitters, cheap to manufacture, install and operate, would give infinite possibilities as to what regions that they are in or what multiplexes that they cover. Transmitters on the verge of two regions could be changed as regards programming, to mirror changes in physical geography such as the construction of a new road or new estate of houses.

You have hit upon the ideal way to implement DAB - by this network of low-cost low-power cellular transmitters. So take it to it's ultimate conclusion. Scrap the pointless high-powered regional transmitters, which have caused all of the problems with the initial implementation of DAB. At long last, with a low-power cellular structure, you will be control of the network's coverage - something that regional transmitters, or a mixture of regional and cellular, will never allow you to do.

I am only a listener, and have limited technical knowledge of your remaining questions, so have answered YES to all of the following.

But my experience of living in North Herefordshire, able to listen to DAB from 40-50 miles away but not 12, has made it clear to me that the way forward is as stated above.

Thank you for reading my submission.

Philip Dodd

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.:

YES

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?:

YES

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

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?:

YES

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

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