

Organisation (if applicable):

VT Communications

What do you want Ofcom to keep confidential?:

Keep name/contact details/job title confidential, Keep part of the response confidential

What are your comments on these proposals?:

'The Future of Radio': VT Communications - key points

1. VT Communications (VTC)

VT Communications (a division of VT Group plc) provides mission critical turnkey communications services to Broadcast and Defence & Security markets in the UK and worldwide. This includes infrastructure design and build, systems integration, operations and specialist planning. VTC delivers managed services under service level agreement to a wide range of customers including BBC World Service, National Physical Laboratory (NPL) and UK Ministry of Defence.

It is a key strategic objective of VTC to be the provider of choice for AM (including DRM) transmission services in the UK as well as bringing our extensive experience to bear on other radio platforms and future television opportunities. VTC is not constrained by the baggage of history and can therefore bring alternative and innovative infrastructure and operations solutions to the radio broadcast market.

VTC has around 50 transmitters sited around the UK. VTC has three major HF transmission sites for broadcast customers and several other HF sites for MoD operations. VTC also has a large MF and two VLF facilities. VTC operates HF, MF and FM sites around the world on behalf of customers and in partnership with other operators.

VTC has highly specialist expertise in large-scale infrastructure design, build and operation supported by the world's leading HF frequency management and planning capability. VTC has also been a leader in the development of the DRM system; we were a founder member of the Consortium. We have pioneered several applications for DRM both within and outside the UK market for both public sector and commercial broadcasters. VTC continues to develop new propositions based on the DRM platform, while looking at other future radio technologies.

VTC is developing a Media Management Centre which, coupled with its new Global Media Network, will enable VTC to manage and re-purpose content from broadcasters to suit any number of their delivery platform requirements.

More information is available at www.vtplc.com/communications

We are conscious that you maybe unfamiliar with the scope of VT Communications' operations within the UK and that you may require additional context for our short comments. Please do not hesitate to contact us if you feel a face-to-face meeting would be helpful.

2. [This section to remain confidential]

3. Provision of future radio services

VTC (and other infrastructure/operations organisations) could potentially offer competitive and innovative transmission service solutions to the UK broadcast market. During the course of TV DSO discussions (in which VTC participated), the concept of demarcation between the site access (core infrastructure) providers and the Managed Transmission Service (MTS) providers was discussed. Further to this and consistent to response 2 above, VTC would hope to see a clear distinction between the core infrastructure owner(s) who offer regulated and transparent prices for network access to operational service providers, in a model akin to the BT wholesale and retail model. Furthermore for provision of future wide-scale radio networks could it be possible to split the procurement of such networks into infrastructure, operation and content?

The aim must be for VTC to be able to compete in the market on a level playing for the common good.

4. Digital Radio Mondiale (DRM)

[With particular reference to consultation document parts 5.19 - 5.30]

As stated above, VTC has been instrumental in the development of the DRM system and continues to develop new service offerings built on this platform. It has the potential to deliver complementary coverage to DAB and fill gaps while allowing seamless switching. This can be provided using a blend of in-country MF and HF allied to HF delivered external to the UK. There is also potential for additional data based services, whether related to the audio content or not. In the era of spectrum scarcity, DRM aims to lead a resurgence in the usage of the AM bands by enabling new broadcasters to enter the market, while extending the reach of existing. DRM could also enhance the prospects for highly localised community radio services.

VTC would hope for a flexible but clearly defined regulatory regime that allows service providers to offer a range of commercially justified services based on DRM. As a lead DRM player, VTC would also hope for an ongoing dialogue with Ofcom on the most appropriate options for a regulatory approach to cover future use of MF and in-country HF bands for DRM. This could include incentive pricing for more efficient use, and management, of this spectrum.

The continued development and demonstration of DRM's benefits to users depends on organisations such as VTC. We therefore hope to see an open and flexible approach to its regulation, which will allow this work to continue.

5. Analogue radio switch-off

[With particular reference to consultation document Proposal 3]

As described throughout this response, VTC has a very focussed and deep interest in the UK radio market, through the provision of transmission operations, infrastructure ownership and future digital services. In particular these involve the usage and management of AM spectrum.

VTC wishes to play a highly active role in the future discussions, reviews, consultations etc related to any potential 'analogue switch-off' or consideration of MF

services. All of which may impact our ability to create and deliver ongoing services for the UK market.