

*Question 1: is the proposed new condition 2(3) of the multiplex licences necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

Whilst the coverage obligations are clear for the PSB multiplexes after DSO is complete, the obligations on the commercial multiplexes are less clear with regard to additional coverage achieved through increase in power levels.

As Ofcom states in 3.13 of the Consultation, “*Multiplex licensees can expect to recoup the vast majority of their costs through charges passed on to the broadcasters, some of whom are in turn obliged to achieve the enhanced level of DTT coverage.*”

Although there has been no announcement of a DSO date for radio, talkSPORT, the holder of an national analogue licence, has been active in supporting the growth of digital radio penetration and currently broadcasts in addition to its analogue frequencies, on DAB, DTT (Multiplex C), DST, cable, satellite and the internet, the costs of which, are not insubstantial.

Whilst the majority of pass-through costs will be absorbed by the TV broadcasters as they use proportionately, greater amounts of capacity, consideration should be given to ensuring that any additional costs are less onerous on radio stations who support the DTT platform in preparing the way for DSO in radio at some point in the future.

*Question 2: Are the proposed new provisions relating to cooperation and coordination with other parties concerning DSO, and contained in the annexes to the multiplex licences necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

No comment is made.

*Question 3: Are the suggested new provisions concerning and Annual Report and information relating to Digital Switchover contained in the annexes to the multiplex licences, necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

No comment is made.

*Question 4: Are the proposed new provisions relating to an obligation to inform viewers about rescanning and other viewer actions required by switchover contained in the annexes of the multiplex licences, necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

No comment is made.

*Question 5: Are the suggested new provisions relating to the Digital Switchover Date and regional timetable contained in the annexes to the multiplex licences necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

*Question 6: Is it necessary, appropriate and proportionate to include in the annexes of the multiplex licences the new, proposed conditions setting out details of broadcasting stations? Please comment on the draft wording if you consider it could be improved. NOTE TO HOLDERS OF MULTIPLEX LICENCES A, C AND D. Please read paragraph 3.29 carefully and note Ofcom's decision that if the commercial multiplex operators wish to adopt any sites above the current 80 they must commit unconditionally to doing so in writing by the closing deadline for this consultation.*

No comment is made.

*Question 7: Are the proposed new provisions relating to cooperation and coordination with other parties concerning DSO, and contained in the annexes to the DTT Service Licences, necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

talkSPORT is in support of the new provisions and believes they will assist in the implementation of DSO and public awareness and understanding. That said, cooperation and coordination should not be onerous and proposes that the following should be added in Annex B 1. (d) of the variation.

..... other parties relevant to the Licensee, as necessary, or as notified.....

*Question 8: Are the proposed new provisions relating to an obligation to inform viewers about rescanning and other viewer actions required by switchover contained in the annexes of the DTT Service Licences necessary, appropriate and proportionate? If not, please explain why and propose alternative wording.*

talkSPORT is in support of the new provisions and already carries out listener information programmes as and when the required due to the addition of new broadcast platforms or changes on existing platforms.