

**Title:**

Mr

**Forename:**

Glyn

**Surname:**

Roylance

**Representing:**

Organisation

**Organisation (if applicable):**

Associated Broadcast Consultants

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

Associated Broadcast Consultants are concerned by the introduction of the term "Small Scale" to this subject that was originally called "Low Cost DAB". We feel that "Low Cost" should be the primary objective, and that size or scale should be determined by what is necessary to deliver "Low Cost". The last thing all stakeholders want is "Small Scale, High Cost"!

The term "small scale" is also used rather ambiguously. Does it refer to "small scale services" or "small scale mux" or "a small scale trial of DAB"?

We agree that Low Cost DAB should be attractive to broadcast services that are small in scale, however due to the technology it requires a number of services on a Mux to be viable. The chances of finding such broadcast services that are "small in scale" is broadly proportional to Mux area. That is to say, if the Mux areas are restricted to too small an area,

there may only be one suitable broadcaster, perhaps rendering a Mux unviable and/or inefficient use of spectrum.

Additionally it would be desirable that Low Cost DAB muxes can attract one or two commercial services to act as "anchor services" that provide a reliable revenue stream and sound financial viability, and continuity for the Mux. Such commercial services will have a minimum Mux area below which they would consider the Mux not be sufficiently attractive.

In conclusion, Associated Broadcast Consultants propose that this trial and possible subsequent legislation be re-focused on the original "Low Cost DAB" aim, and references to "Small Scale" removed.

**Question 1: Do you agree that we have identified the objectives which the small scale DAB multiplex trial should seek to achieve?:**

Yes

**Question 2: Are there any other questions or issues which the small scale DAB multiplex trial should seek to address?:**

Yes, plus:-

2.1 Associated Broadcast Consultants believe that DAB+ operation should not be ruled-out on this trial if it is technically possible. If a multiplex could be operated on a combined DAB/DAB+ basis it would permit apples-to-apples comparison of the two approaches. It would also provide an opportunity to assess the penetration of DAB+ devices - information that does not seem readily available without a field-based approach. An insight on DAB+ penetration could influence the DAB/DAB+ decision in subsequent DAB launches, which in turn will impact service capacity and revenue potential. ie: the information is fundamental to the business plan.

**Question 3: Do you agree with our proposed technical licence conditions?:**

Yes except:-

3.1 We are confused by an apparent anomaly between maximum ERP of 100watts and proposed coverage area no greater than 40% of the area served by any local DAB multiplex serving the same area.

3.2 Analysis of Ofcom Transmission Parameters database indicates that the average power of (non-national) DAB transmitters is 2281watts (over 20 times more than 100w). Whilst the 40% and 20 factors do not translate directly into number of sites required to cover a given area, it does imply that significantly more transmission sites would be required by Low Cost DAB operators for equivalent coverage in their "up to 40%" area, implying more costs which would jeopardise the "Low Cost" aim.

3.3 Furthermore such a large discrepancy in power increases the risk of ACS from incumbent DAB services onto Low Cost DAB multiplexes.

3.4 Associated Broadcast Consultants propose that the ERP limit is removed from the technical licence conditions, retaining just the 40% criteria. For the purposes of the trial the maximum power will be limited by the equipment available (and the licence granted).

**Question 4: Do you agree with our approach to non-technical licence conditions and requirements?:**

Yes, except:-

4.1 Associated Broadcast Consultants believe that DSPS/DAS licence fees ought to be waived - if necessary with a licence qualification that they are only valid for this DAB trial.

4.2 Many small scale broadcasters would not be prepared to subsidise the DAB trial in this way, but they would be willing to provide their programme material at no cost.

4.3 If this were possible we feel it would help to secure an "abundance" of programme services which might not be possible if fees were retained. Service abundance would help increase public awareness. In addition, Service abundance (or not) is effectively evidence of demand, which could also reflect on the perceived success of the trial.

**Question 5: Do you agree with our proposed approach to awarding trial licences?:**

Not entirely:-

5.1 We do not think requiring applicants to specify only one of the three trials is the best approach. If their proposal is flexible and able to accommodate more than one type of trial then it should be possible to "bid" for more than one. This would give Ofcom the biggest "pot" possible from which to select bids that offer the most attractive overall proposal.

5.2 Although the "beauty contest" approach is understandable where Ofcom supplies equipment from a finite budget, we suggest that a fourth, unlimited, trial category ought to be available where applicants can supply their own equipment and connectivity. This might need extra guidance on the mask filter (or preferably a waiver below a certain ERP if technically possible)

**Question 6: Do you agree with our proposals set out in this section in relation to final reporting obligations, the recovery of the equipment and the extension of trial licence duration?:**

Yes, plus

6.1 For consistency, we suggest that a standard template be provided for reporting.