

Title:

Mr

Forename:

Andy

Surname:

Clarke

Representing:

Organisation

Organisation (if applicable):

Ringtone.net LTD (Severn FM)

What additional details do you want to keep confidential?:

No

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

None. Happy for name, organisation, email address (not phone number) to be made public

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

In our opinion, the costs of DAB entrance in the UK, prohibits smaller operators of benefiting from the technological benefits that DAB brings to radio. This is an exciting opportunity for smaller service providers to be involved with a trial of which the results will directly benefit them and other smaller scale "radio" operators in the UK. A report published by Ofcom on the 8th August 2013, does reference the term "small scale" however the main benefits of the report indicate the significantly reduced costs of entrance to DAB for smaller Service Providers. The low cost is the defining attribute that will determine if a Hospital Radio Charity, Internet Radio or Community Radio Station will be able to setup a Low Cost DAB service. We believe that the term 'Small Scale' should be removed and replaced with the term 'Low Cost'.

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 - This would be an ideal opportunity for at least one of the Service Providers to be broadcast in DAB+/AAC in the trial MUX transmission. This would be an ideal opportunity to understand how many DAB+ capable devices are currently in use. It would also be a good opportunity to measure the audio quality of a DAB+ with a lower bitrate vs DAB.

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

Partially. We believe that the 100W ERP figure should be removed and the criteria for proposed coverage area of no greater than 40% of the area served by any local DAB multiplex serving the same area, be retained. This would reduce the number of sites required to meet the 40% limit thus reducing noise and interference from "full scale" DAB providers.

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

Partially. If a Service Provider does not require a DSPPS/DSP licence to operate in their current mode, but would need to purchase one for this trial, then we believe there should be a concession for the cost of the licence. This could be application fee and licence fee waived or at minimum the application fee waived. This would help smaller providers by allowing them to put the funding into covering Music Licensing costs helping to support the typical applicants for a Low Cost DAB licence.

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

Partially. We understand the need to keep the Ofcom costs within budget in respect of the hardware that will be supplied to the trialists, however limiting the trial to just 3 trials in the UK could skew the Trial results significantly. We believe there should be another category whereby a trialist can propose a DAB configuration that meets Ofcom's criteria but where the hardware and connectivity is fully funded by the trialist and another category which is possibly funded by the trialist and Ofcom. For example, smaller providers may not be able to afford the cost of backhaul using Ethernet services such as EFM or the cost of a linear amplifier, however the other hardware and associated applications could be provided by the service provider.

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