

Your response

Question	Your response
<p>Question 1: Do you agree with our proposals for adding requirements to the Television Technical Code and Digital Radio Technical Code relating to resilience of broadcast networks and access services?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 2: Do you have any comments on our proposed changes to the DAB Technical Policy Guidance relating to the process of transmitter approvals?</p> <p>In particular, do you have any comments on our proposed sensitivity analysis, or on whether we should require or permit applicants to provide both horizontal and vertical antenna pattern information?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 3: Do you have any comments on our proposals for investigating and potentially permitting use of the non-critical mask?</p>	<p><i>Is this response confidential? – N</i></p>
<p>Question 4: Do you have any observations on Ofcom’s processes and information we are providing and proposing to provide in relation to acceptance tests and compliance checks? Is there anything missing that would help make the process smoother or easier from your perspective?</p>	<p><i>Is this response confidential? – N</i></p> <p>We expect Ofcom to prioritise the interests of any potential listener or consumer of DAB radio services in the way that these proposals are specified and implemented. For example, consumers and listeners must be assured that the coverage and uptime of all DAB transmissions are contiguous and of a similarly high-standard. We are concerned that SSDAB multiplex operators are not being asked to guarantee their minimum uptime, and are occasionally operating at significantly reduced service levels when compared with other DAB multiplex providers. Consumers should expect service coverage and availability for SSADB that is in line with best-practice and provision across all DAB provision. The nature of the local SSDAB provision should not be second-class, not provide operators with any excuse to lower service expectations and thresholds. In order to guarantee these high standards, we believe it</p>

	<p>is necessary for Ofcom to publish an aggregate of the service levels information, with each SSDAB multiplex service maintenance thresholds collated and tracked by Ofcom on an ongoing basis, and at least every three months. In addition, and as part of Ofcom's standard service tracking and monitoring, Ofcom should monitor the variations between the equipment being used for SSDAB transmission, as these can differ significantly from the large-scale transmission infrastructure and small-scale infrastructure. Operators must not be tempted to 'sweat' under-resourced equipment in order to save costs, while accepting lower service levels for listeners. We believe that consumers who are subject to above-standard dropouts and periods of reduced coverage, must have their interests protected by Ofcom. As SSDAB is an effective monopoly for local broadcast capacity for digital radio provision in each multiplex area, and there is no way at present to apply for analogue radio licences, it is essential that the interests of the listener are protected by Ofcom, ensuring that DAB services operate at maximum sustainability and provide the optimum coverage for the area advertised in each licence round.</p>
<p>Question 5: Do you have any comments on the EMF, HbbTV, or document format modifications proposed in this section?</p>	<p><i>Is this response confidential? – N</i></p>