Your response

Question	Your response
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?	*Is this response confidential? –N* The DTG acknowledges the excellent work taking place across the sector, building on the current investments in resilience and recognises the complexity and challenges our industry partners face. We welcome Ofcom's recognition of the importance of access services to a large part of the television audience. The DTG fully supports access services being given the same priority as the video and audio components. The DTG further supports the requirement for multiplex licensees to feed back on service continuity plans and test exercises of those plans. This will hopefully ensure users don't experience a significant loss of service as they did during 2021. Ofcom's recognition of the viewer impact of past incidents, and the need to improve the robustness of the broadcast infrastructure, will be of benefit to all viewers. Looking beyond the changes that are proposed for the terrestrial network, we would draw Ofcom's attention to our own recent initiatives at the DTG examining how we deal with the increase in, and ultimate transition to, IP delivered services. Our Future Pathway project has taken in research from across our membership and the industry as a whole to highlight the areas that present challenges on the roadmap ahead as we move towards an IP-centric viewing experience. In the future, viewers will be reliant on a robust and resilient delivery infrastructure, across a more complex eco-system and provisioned by a greater number of providers – both inside the viewer's home, as part of their own IP networking infrastructure and outside the home, in the car and on the move, as part of their mobile viewing experience. We urge Ofcom to look ahead to the scope and nature of technical codes required for the future in

	order to ensure a robust and accessible platform on which to receive services.
Question 2: Do you have any comments on our proposed changes to the DAB Technical Policy Guidance relating to the process of transmitter approvals? **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?**	*Is this response confidential? –N* No comment.
Question 3: Do you have any comments on our proposals for investigating and potentially permitting use of the non-critical mask?	*Is this response confidential? –N* No comment.
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?	*Is this response confidential? –N* The DTG agrees with the proposal to carry out receiver sensitivity analysis when assessing potential cases of transmitter interference. The DTG has accredited facilities and a receiver collection available to support this work to ensure a consistent, replicable and repeatable approach.
Question 5: Do you have any comments on the EMF, HbbTV, or document format modifications proposed in this section?	*Is this response confidential? –N* The DTG fully supports the addition to Ofcom's DTT Reference Parameters of the newer HbbTV technical standard which is now mandated in receivers by the DTG D-Book, with MHEG as an optional requirement. This is captured in section 22.1.6.1 of DTG D-Book: **22.1.6.1 Interactive middleware** **To support interactive TV, receivers shall comply with the following:** **• HbbTV and the mandatory requirements set out in Chapter 13.** **Additionally, receivers may comply with the following:** **• MHEG-5 and the mandatory requirements set out in Chapters 11 to 12.** Your proposed change to paragraph 2.38, as worded, could be misinterpreted as implying that a service uses only one technical standard whereas, in practice, some services support both technical standards simultaneously.