Your response

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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 (delete as appropriate)* As no specific regulatory burden or obligation has been described, it is difficult to have a firm view. However, we generally agree that all operators should ensure a proportionate service continuity plan in place which that meets the reasonable expectations of those contributing financially, in exchange for carriage.
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 (delete as appropriate)* We would like to share an observation that like small-scale operators, some local operators do not retain 'in-house' technical capabilities and either defer such responsibilities to their transmission provider, or request the small-scale operator provide a burdensome amount of evidence to 'prove a negative'. If Ofcom ceased to provide the initial assessment, it is likely in a large number of cases that Ofcom would still need to carry out an assessment after the negotiation process has timed out. Therefore the suggestion that Ofcom will continue to provide an initial assessment is very welcome. Because the calculations are only carried out over a short distance, the model cannot contain enough data points needed to provide a great deal of accuracy (and it is more akin to a free-space calculation) it is none the less a useful 'yard stick' for assessing potential risk. Where it is available, adding the antenna VRP would provide an additional (useful) data point which could provide a more realistic

	assessment, but it would still mostly be a free-space calculation. It could be useful to carry out a programme of close-in field strength measurements from different transmitting antennas, structures and heights at distances out to ~500m . This could help determine further correction factors which could then be applied to future assessments. Our comment to the sensitivity analysis is that it appears to be well thought out and we look forward to this being included in the process. In short, digris support the proposed revisions to the ACI process.
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 (delete as appropriate)* We can see no technical impediment to permitting the use of the non-critical mask in cases where there are no other local spectrum users closer than +/- 3 MHz of the DAB block centre frequency. This is because the level of spurious signal suppression required is identical the critical mask beyond this point. There may be isolated cases of OOB noise or overload impacting existing systems, but these are likely due to a skill issue with the planner/installer – this should not preclude others from commissioning more carefully thought through installations with a relaxed mask characteristic. For lower power levels (e.g. for gap or ACI filling applications) the spurious emissions mask as defined in ETSI EN 302 077-2 (Pg 11 and 12) should be applied. A more relaxed approach to masks that is more aligned with the ETSI standard would be transformative for the DAB opportunity - it would open the door to economically viable 'gap filling'. Decoupling the need for a bulky battery of cavity filters would not only save sums from capital cost, but would enable compact units to

	be used to form thicker networks of greener, low power transmitters. Such an approach could deliver better spectral efficiency through more tightly tailored network coverage, and also provide greater resilience.
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 (delete as appropriate)* *We note that compliance checks do not actually check 'fitness for purpose' of the resulting signal.* *Reputable transmission providers are able to provide metrics about signal 'quality', in addition to 'quantity'.* *We feel it is proportionate to require additional measurements such as MER/EVM and pre-Viterbi BER - and that they meet reasonable limits.* *This would help to ensure that equipment that is placed into service actually does meet the standards to which it is required to conform.* *It would also give some comfort to both the Regulator and the radio stations using the service that it has been installed and commissioned to a sufficient quality standard.* *It is a responsibility and privilege to operate a DAB multiplex as the fortunes of the services carried rely on it's correct operation, therefore we believe that these metrics are highly important.*
Question 5: Do you have any comments on the EMF, HbbTV, or document format modifications proposed in this section?	*Is this response confidential? – N (delete as appropriate)* None.