

## Your response

## Question

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?

## Your response

Is this response confidential? - N

We do not believe that there is a need to add such a general condition. As a multiplex licensee, we already have regular dialogue with our transmission providers as to the status of their networks, its resilience, any future planned work, as well as everyday work that happens as required. We communicate this information with our service providers to ensure all parties are in the know.

We contract with our transmission providers to deliver their services to a high service level agreement, and do not see a need to replicate their infrastructure to cover significant outage, which by their nature are few and far between. As part of this, we expect our transmission providers to have well prepared disaster recovery plans.

It would not be economically viable for each multiplex licensee to replicate their transmission providers infrastructure – to do so would undermine the very DAB platform that Ofcom seeks to protect.

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

We support Ofcom's proposed changes, though recognise that some small technical refinements may further assist, such as using both Horizontal and Vertical Radiation patterns to provide an ability to create 3D antenna pattern files.

We would welcome further information as to how Ofcom believes its proposed sensitivity analysis is introduced and monitored.

	As robust reception is a key fundamental of broadcasting, we would like reassurance that any relaxation in planning standards is limited purely to ACI blocking.
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  We provide 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  We provide no comment.
Question 5: Do you have any comments on the EMF, HbbTV, or document format modifications proposed in this section?	Is this response confidential? — N  We provide no comment.