



**UK Community
Radio Network**

UKCRN Response to consultation

Consultation Title: Changes to the digital television and digital radio technical codes

The UK Community Radio Network exists to support the over 300 OFCOM Licenses Community Radio stations in the United Kingdom. We are an organisation dedicated to representing, supporting and developing Ofcom Licensed Community Radio Stations across the United Kingdom. What we do, and how we do it is driven by our members and the Station Managers and Management Reps that we meet with and speak to on a regular basis. Set-up at the start of the pandemic as an opportunity for OFCOM managers to come together, socialise and support each other through a difficult period, the group has now been registered as a Community Interest Company to further develop, represent, and promote the sector.

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?

Resilience is a critical component of creating a reliable and trusted transmission network that satisfies the needs of both broadcasters and the public alike. We welcome Ofcom's identification that smaller operators (i.e. SSDAB multiplexes) may not necessarily have the resource available to them compared to larger more complex networks and mandating a 'one-size-fits-all' approach is unlikely to be feasible. The wording that has been suggested provides sufficient leeway for Ofcom to adopt reasonable and measured responses to individual cases of breakdown, damage, or other transmission interruptions.

Our only suggestion would be that Ofcom were amenable to meeting with sector stakeholders to help discuss how this policy would work in practice, so that we (and other sector organisations) could feed advice onto our members.

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?

We are largely happy with the changes that Ofcom are suggesting. A number of community radio stations operate or are involved in SSDAB multiplexes, and have fed back to us that their experience of the 2019 simplified process has been largely positive. Originally, there was some apprehension around difficulties with interactions with other digital radio sector participants, but this has largely not been borne out in practice. We would suggest this is largely as Ofcom has been pragmatic in their management of objections. Of course, nothing

is perfect, and we welcome Ofcom's acknowledgement that there is scope for some refinement.

The current method of ACI assessment and the documentation that Ofcom provides is very useful. We agree that it seems to be a waste of resources to expect prospective operators to make their own assessment of ACI impact at the final technical plan stage, given that Ofcom will generate this documentation anyway, and the ATDI HTZ software that Ofcom rely on is *generally* out of the reach of smaller operators.

We welcome Ofcom's suggestion that where impact is negligible, liaison with existing operators prior to proceeding will not be required. This process adds delay to the launch process which, when operating on a relatively tight timetable, can have an impact on multiplex providers. While we feel the 25 household count is a relatively light threshold for consideration, as the process will remain internal with Ofcom at that point, we have no issues with this. We do wonder whether, where ACI impacted pixels are identified by Ofcom in ACI assessments that encompass high-rise blocks of flats, Ofcom make consideration of this. In these cases, there are a significant number of properties that are directly underneath the transmitter, and our real-world experience in these cases is that they are less likely to suffer blocking than other locations around the transmitter. However, we welcome that Ofcom will continue to handle the assessments in Case 2 and Case 3. The other two values (distance from roads/areas) are reasonable.

We do not foresee any issues with Ofcom permitting the submission of both horizontal and vertical antenna patterns, particularly if this remains optional. Whilst this does add some additional complexity, almost all transmission equipment is sourced from well-established suppliers and antenna patterns should be easily obtainable during the planning stage. This is unlikely to cause any real issues.

We welcome Ofcom's continuing commitment to refine this strategy based on real-world observations, particularly given the large number of SSDAB multiplexes which will come to air in the next few years.

Question 3: Do you have any comments on our proposals for investigating and potentially permitting use of the non-critical mask?

We strongly welcome Ofcom's proposal to investigate the use of non-critical mask filters for use by multiplex operators. The cumulative cost saving (whilst individually is *relatively* small) could mount up across multisite networks, for instance across a larger SFN. This saving is likely to be reasonable enough that non-critical mask filtering should be investigated for lower power multiplexes.

We welcome the investigation and testing, and it is encouraging to see a number of organisations willing to work with Ofcom to support this. In particular, understanding receiver operation is critical and we look forward to the results of this testing. We would suggest that Ofcom commits to making the results of this research public, regardless of whether allowing non-critical mask filtering is adopted or not.

Significant responses were received by Ofcom with regard this point in their previous consultation "Revisions to Digital Radio Technical Codes" and we have no additional comments that would add to those responses.

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?

We welcome Ofcom's provision of information in regard to compliance testing, and recognize that it is likely to be impossible (in a purely practical sense) for Ofcom to routinely visit sites to aid in compliance testing. The publication of more detailed additional guidance and support should help to increase the number of transmission engineers who are able to provide compliance support for multiplex operators. We do not really see anything missing that would simplify the process further.

Question 5: Do you have any comments on the EMF, HbbTV, or document format modifications proposed in this section?

The addition of EMF conditions to the DAB Technical Code is low impact, given that EMF conditions apply already as a result of an operator's existing licence requirements. We have no comments on the other two substantive components of this question.