

In general we (Audessence Ltd & its Small-Scale DAB operation UDAB) are fully supportive of these measures, which reflect a healthy common-sense approach.

The answers we wish to contribute at this stage are:

Q1./Yes

Q2./No

Q3./Yes

Q4./Yes, but we question whether [at s6.20] it is really necessary to mandate EEP-3A protection for DAB+. We have some broadcasters using EEP-2A currently, and in some cases they have continued to pay for the more robust signal over a period of time well in excess of 12 months.

This could be significant if ACI risk causes small-scale DAB e.r.p to be capped at a level that does not actually provide coverage of the desired area according to the published criteria (which are overly weak), let alone according to what actually provides a reasonable level of service to the listener in practice (viz signal levels delivered over wide swathes of urban areas by existing DAB i.e. some 10-12dB above the published thresholds). If there are no other economically viable methods of providing that coverage, removal of the EEP-2A option could have perverse consequences. In commercial terms, nailing every broadcaster to EEP3-A would seem most equitable, so the proposal is very understandable in that context.

For completeness: In our experience the capacity overhead required by EEP-1A meant it did not seem a sensible option to offer (we did trial EEP-1A over a period of many months with one broadcaster that was keen to maximise absolutely everything regardless of cost, but they later agreed it was uneconomic following discussions with us). We also agree that use of EEP4 and EEP5 are undesirable on the basis that those would undercut the needs of listeners.

Q7./Yes.