

Question	Your response
<p>Question 1: Do you agree with our proposed changes to the ACI/blocking procedures?</p>	<p>The Community Media Association (CMA) is the UK representative body for the community broadcasting sector and is committed to promoting access to the media for people and communities.</p> <p>The CMA welcomes Ofcom’s consultation on Revisions to Digital Radio Technical Codes and supports the premise of Ofcom's proposals. The CMA has consulted with a number of SSDAB trial operators and our response has been informed through our engagement with those parties.</p> <p>We recognise the need to address ACI and blocking issues in anticipation of the roll-out of possibly hundreds of new small-scale DAB (SSDAB) multiplexes in a new phase of digital radio expansion as it is expected that the current procedures will not adequately scale to meet growth in this area. The CMA largely concurs with Ofcom’s proposed changes to the ACI/blocking procedure.</p> <p>However, with regard to the proposal to modify to require proposers to self-categorise new site proposals into ‘Red’, ‘Amber’, or ‘Green’ categories by using simple non-mathematical criteria, site categorisation could be considered to be subjective and open to potential abuse by incumbent operators who might unreasonably classify an uncontentious site as ‘Red’.</p> <p>By virtue of the nature of SSDAB it is likely that these multiplexes will operate at relatively low transmission powers and will be sited closer to their listeners than higher-powered multiplexes. SSDAB multiplexes are therefore more likely to be closer to densely populated areas and major roads and therefore more likely to be potentially classed as ‘Amber’ or ‘Red’.</p> <p>The designation of a site as either ‘Amber’ or ‘Red’ has the possibility of being a relatively subjective assessment due to the nature of the non-mathematical criteria used for</p>

classification. 'Amber' sites are those "having the potential to cause some interference to some DAB multiplexes" and would be in areas at the coverage edge of another service or services. 'Amber' sites will be existing sites where "higher powers or closer frequency relationships will be present".

'Red' sites are "expected to cause significant interference to other DAB multiplexes" and could be within the coverage area(s) of other DAB multiplexes and close to densely populated areas or major roads. 'Red' designated sites are those which contain densely populated areas and major 'A' roads - and it is particularly within areas such as these in which a relatively high number of new small-scale multiplexes might be deployed. It may be necessary and it is recommended that a more flexible approach is taken when defining the criteria for potential 'Red' sites in order to account for the likely pattern of deployment that is expected for new small-scale DAB multiplexes.

When evaluating the colour category for a new DAB transmission proposal, objective criteria to consider might be the operational frequencies, relative transmitter power levels and local field strengths of other multiplexes operating in the proposed area. And mitigating steps should be defined so that an incumbent multiplex operator may not arbitrarily block a proposal from a new entrant by categorising it as a Red site and therefore blocking any forward progress. A clearly defined mediation and dispute resolution procedure should be defined by Ofcom to assist with cases where a site has been classified as 'Red'.

The proposed process to resolve 'Amber' sites appears to be fair but no time parameters have been suggested in which Ofcom should resolve disputes. We therefore propose that Ofcom must provide a decision on an 'Amber' site within 25 days. It is envisaged that SSDAB multiplex operator licences will be granted for shorter periods than for those of large multiplexes and the nature of SSDAB means that a higher number of short-term service licences are likely to be issued - it is therefore

	<p>imperative that Ofcom commits to a short predictable deadline for turning around disputed sites.</p> <p>The proposed revisions state that “The modified ACI process still requires final Ofcom approval before new transmitters are commissioned and brought into service” but no service level criteria have been given - and given the high interest and demand for operator licences for new digital radio services, we would expect that Ofcom is held to responding to new transmission proposals by an agreed and published deadline with a published dispute resolution procedure for those occasions when the service level agreement is not met.</p> <p>The CMA welcomes the proposal that short duration ‘drive tests’ should be permitted to confirm the extent of any actual ACI effects since for low-power installations the resolution of proprietary theoretical current computer models do not always provide an accurate prediction of ACI issues as experienced in practice.</p> <p>We accept the proposal to permit prospective multiplex operators to implement a temporary site and broadcast for a few hours to assess the impact of the new site. This test process should be made as simple and efficient as possible.</p>
<p>Question 2: Do you have any comments on the adoption of the new ETSI mask characteristic and on the potential use of the non-critical spectrum mask?</p>	<p>Notwithstanding the possible typographic error in Table 2: Non-critical (‘uncritical’) ETSI characteristic on Page 11, which contains two rows both labelled “+/-0.97 MHz” (from Table 1 the first row should probably refer to “+/- 0.77 MHz”), these proposals are supported.</p>
<p>Question 3: Do you agree with our proposed changes on DAB+ audio encoding?</p>	<p>Ofcom's support for the DAB+ standard is welcomed and we agree that multiplex operators should be able to broadcast in either standard DAB or DAB+ without having to obtain prior written consent from Ofcom. Additionally it has been suggested to the CMA that multiplex operators should be able to offer different levels of error protection depending on the specific requirements of the broadcast service.</p>

Question 4: Do you agree with our other proposed revisions to the Digital Radio Technical Code outlined in Section 6 of this document? Do you have any views on alternative models for dealing with the administration of Sid and TII codes?

The CMA largely agrees with the various proposed Revisions to the Technical Codes and makes the following specific observations:

MCI/FIC Repetition Rate: The CMA agrees with the proposals outlined for Ofcom to clearly articulate the link between MCI repetition rates and the number of services carried, in order to provide consistency with the international standards for DAB transmissions. Additionally, Ofcom should be open to receiving information from operators that the minimum MCI repetition rate can be maintained when more than 20 services are carried on a multiplex or that reception is not necessarily impaired with slower repetition rates in order that operators can provide listeners with a greater range of programme services.

Error Protection: It is unclear as to why it is proposed that standard DAB-encoded services must use Unequal Error Protection level 3 ('UEP-3') and DAB operators may obtain consent from Ofcom in order to deploy a more robust level of error protection (e.g. UEP-1 or UEP-2). However, DAB+-encoded services must use Equal Error Protection level 3A (EEP-3A). Trial operators have informed the CMA that both EEP-3B and EEP-2A on individual services have both proved to be useful. It is therefore suggested that it should be open to the multiplex operator to decide on any appropriate protection level from EEP-3B to EEP-1A according to needs of the specific service.

Polarisation: We believe that the Technical Code should be revised to allow for horizontal or mixed polarity transmission to be deployed in those circumstances in which the multiplex operator has determined it is required.

Sid Codes: The CMA believes that Ofcom is best-placed to continue to administer Sid codes as this is such a critical aspect of transmission management. Transfer of this function to an external body carries the risk of a requirement to save administrative costs and/or generate income, particularly if this work is transferred to a profit-making organisation and such a move is likely to impede the roll-out of new

	<p>digital radio services. As Ofcom currently centrally allocates SId, EId and TII codes as part of the licensing process then these activities should continue to be administered by the broadcast regulator.</p>
<p>Question 5: Do you agree with our other proposed revisions to the Technical Policy Guidance for DAB Multiplex Licensees document outlined in Section 7 of this document?</p>	<p>The CMA agrees with the general principle that the current Sections 2.1. to 2.4 of the Technical Policy Guidance that relate to the audio characteristics of services carried on DAB multiplexes should not apply to new small-scale DAB multiplexes and we look forward to Ofcom's separate future consultation on this matter.</p>