

DTG welcomes the opportunity to respond to this consultation.

DTG has been a central part of the Digital Radio Tick mark in the UK since it was launched in 2014 and has closely followed the progress of DAB uptake as it has reached the DCMS milestones for a switchover review. DTG recognises that a vital aspect of the digital radio platform is providing access to small scale community radios services and ensuring launching these is both technically and commercially feasible when compared to alternative platforms such as FM. As such, the DTG supports and welcomes Ofcom's initiatives to review the DAB Technical Codes to reflect the needs of small-scale DAB services.

While the proposals go some way to providing a clear and cost-effective route to launching a small-scale DAB service, concerns remain over technical evidence available to support relaxing transmitter spectrum masks and the impact this will have on receivers. As such DTG recommend that measurements are carried out to support this on a representative sample of receivers.

This document has been written using feedback from the DTG's membership but does not necessarily represent the views of all DTG member organisations. Please note that the DTG is made up of member companies who may also be submitting an individual response.

Question 1 – Do you agree with our proposed changes to the ACI/blocking procedures?

Overall DTG agree with the principle of adapting the DAB Technical Code to make it more appropriate for the small-scale DAB users. Additionally, having set timescales for responding to coordination requests between proposers and incumbents, will help with planning costs and implementation. However, as stated in the consultation, ACI and blocking are separate performance criteria and impact different aspects of the receiver design. In receiver testing processes, these are assessed in different ways, and so this difference needs to be catered for in the process for small scale DAB, whether that is at initial Red/Amber/Green assessment or another stage. In addition, the coordination process needs to consider not only national and local services, but also other small-scale services being launched or already launched. This is something which is not reflected in the current Annex 7 technical policy.

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?

Further work is required to characterise the potential impact on DAB users from transmitters using the non-critical mask. It is recommended that lab measurements to characterise the potential scale of any issue are carried out. These can then be used to make an overall judgement on the potential impact, in combination with knowledge of expected coverage and signal levels. Currently, there is no

DIGITAL TV GROUP

5TH FLOOR, 89 ALBERT EMBANKMENT,
VAUXHALL, LONDON, SE1 7TP, UK

T: +44 (0)20 7840 6500
M: +44 (0)20 7840 6599
E: CUSTOMERSERVICES@DTG.ORG.UK
T: @THEDTG
W: DTG.ORG.UK

evidence as to how receivers will be impacted, so launching services without this knowledge could result in poor listener experience, as well as time and money for service providers to manage issues retrospectively.

Question 3 – Do you agree with our proposed changes on DAB+ audio encoding?

DTG agrees with the proposal to simplify the process for transitioning to DAB+. The Digital Radio Tick Mark scheme has included DAB+ as a requirement since it was launched in 2014. DAB+ is a more efficient standard compared to DAB, which could allow for a wider range of services to be transmitted using the same spectrum as DAB, or for an enhanced quality of service in the same spectrum. Many of the small-scale DAB services launched so far have been on DAB+, and the more DAB+ services available will, in turn, increase the relevance of the tick mark, encouraging more availability of DAB+ receivers. As stated in the consultation, any decision to transition to DAB+ from DAB needs to be supported with listener communication and clear guidance well in advance of the proposed change.

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 process of service ID and other code allocation could be handled by industry, as is done with TV LCN allocation. With the advent of small-scale DAB services, the requirements for SID and other code allocation will need to be reviewed to consider spikes in demand for codes, as well as organising and managing reuse of codes. A principle aim of the consultation is to streamline the process of launching a service and ensure there is clarity about expected timescales. Having a dedicated resource available to handle code allocation in addition to communication to service providers, will help to achieve this aim.

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?

No comment on section 7.

ABOUT THE DTG

The DTG is the self-funding UK collaboration centre for innovation in digital television, reaching industry, government, academia and international partners, set up with the purpose of looking after the digital TV marketplace. It underpins the free-to-air platforms Freeview, Freesat and YouView, and supporting the development of Sky, Virgin Media, BT and TalkTalk.

It has been central to the distribution of TV in the UK for nearly two decades through the collaborative development of industry standards and best practice and is currently embracing the convergence of content and networks across industries to focus on the efficient delivery of video to all screens - mobile, tablet and TV - in all formats: standard, high and ultra-high definitions.

The DTG supports the next generation of digital TV and related technologies through its work in the delivery of video to mobile devices, television on tablets, spectrum coexistence management, TV white space, home networking, connected TV, accessibility and the UK UHD Forum. For more details please visit: dtg.org.uk and dtgtesting.com.

