Your response

Question	Your response
Question 1: Should Ofcom exercise its discretion to consent to the applica- tion to vary the Stirling & Falkirk small-scale multiplex licensed area, with regard to the statutory and pol- icy considerations set out in this doc- ument?	Confidential? – N The FCS notes the benefits of increased coverage which would result from the proposal to vary the coverage area of the SS-DAB Scheme in the licensed area. However, the consultation does not assess whether the impact of rais- ing the power level results in Harmful Interference to other systems that may deployed in neighbouring radio spectrum assignments, and which provide vital services upon which citizens rely.
Question 2: With reference to our impact assessment, do you agree with our assessment of the potential impacts of approving this application?	Confidential? – N The FCS notes that the proposals do not include the as- sessment of the potential for the higher-power SS-DAB scheme to cause harmful interference to systems that are located close to the SS-DAB transmitter and are op- erating in proximate radio frequency bands. This arises from the relatively lax transmitter Out of Band Emissions specifications for Cases 1 & 2. See below for the refer- ences. Whilst this matter is most notable where the SS-DAB sys- tem is located (in spectrum terms) in block 7D, it is also possible in other spectrum, depending on the distances involved. As a result, the assessment of the possibility of this Harmful Interference is a necessary precaution to in- clude in the Ofcom investigation of this application. This assessment is already performed by Ofcom for other SS-DAB deployments. References: OOB Limits. ETSI EN 302 077, Section 4.2.5.2 - Limits - Cases 1 & 2. Note that Cases 3 & 4 are included in the ETSI Stand- ard precisely because of this Hazard but were not in- clude in the Ofcom policy. Spectrum Mask. ETSI EN 300 401, Section 15.4 - Spectrum Mask

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	Note that radiocommunications for critical services fre- quently has sensitivities significantly below these limits and therefore can experience Harmful Interference when in relatively close proximity.
	The FCS makes no comment on service adjustments to increase the number of listeners.

Please complete this form in full and return to smallscaleDAB@ofcom.org.uk.