

DIGILINK CONNECT

Ofcom Small Scale DAB Consultation Response

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Consultation Response

Here at DigiLink Connect, we are looking forward to the exciting future of Small Scale DAB here in the UK and since our last response, we have been working tirelessly to make sure our Small Scale DAB offering “Xmit” is ready for the market once the first round of licensing begins. The team at DigiLink Connect alongside our associates and contractors are focused on providing all technical aspects for Small Scale DAB multiplex holders and broadcasters. After years of research into product options, our selected primary partners are currently successfully delivering significant mainstream DAB transmission in many countries around the world. This has enabled us to develop a highly stable and cost-effective model & solution with total technical support, suitable for both small community broadcasters and large commercial radio groups.

We feel strongly that the proposed guidelines of transparent pricing and ensuring that small-scale radio multiplex licences are awarded to both commercial and not for profit entities, with no restrictions on the number of licences that an organisation or entity can hold, are very positive and a step in the right direction for a fair & competitive licensing structure. This should invigorate the sector, driving greater choice than ever before and providing a much needed digital future for the smaller, successful analogue broadcasters of today.

We have however noted from a technical standpoint little or no mention of the use of SFN's in the latest documentation. We believe that the use of this technology may be essential to effectively cover the larger polygon areas published. Within this, the use of GNSS or GPS based timing references should be a requirement for SFN installations in the SSDAB technical specification, to help prevent the aforementioned “Hole Punching”. Furthermore, due to factors such as ACI, at a minimum, we feel basic telemetry should be mandatory on SSDAB installations to prevent rogue transmitters impacting other services such as ourselves and larger scale transmission providers.

At DigiLink Connect we intend to install GNSS references & telemetry at all of our SSDAB transmitter sites to effectively monitor our network 24/7 & minimise the impact to our customers, other multiplexes and listeners, should an unavoidable & extremely occasional fault occur - either with our equipment or transmitters run by other parties.

Please find below our other comments on the technical & licencing proposals for the rollout of the project;

- We welcome the requirement for the use of High-Efficiency Advanced Audio Coding v2 as a standard however as advocates of technical efficiency and improvement, the reality is that an unknown proportion of DAB v DAB+ receivers exist and one can only make educated guesses as to that reality. Suffice to say, there is likely a significant number of older receivers in use across the UK, leaving a vast number of potential listeners unable to receive a DAB+ service. Potential clients we have spoken to so far have also raised this as a concern and something that would make them think twice about using the platform. For this reason, we strongly advise a reconsideration of the imposition of this standard to allow multiplex operators and broadcasters the choice to make services backwards compatible by using traditional MPEG Audio Layer 2 DAB encoding.
- We appreciate that ODR (Open Digital Radio) has provided a low-cost muxing option to the current trials and given the project the traction required to move forward. We have however noted flaws in the software during our extensive research and also due to the lack of any official support channel being available. Some proposed multiplex and or transmission providers may find it difficult to access the appropriate support to quickly rectify software-related faults should they occur under these circumstances. At DigiLink Connect, we are the UK partner of world-renowned DAB platform Paneda, which we use to provide our Xmit solution with official support available 24/7 from both ourselves and Paneda. We feel that transmission providers looking to sell ODR to prospective clients should be required to disclose the risks involved due to the lack of official support.
- We have invested heavily in network infrastructure in anticipation for Small Scale DAB and this includes a high standard of network connectivity to our future licensee's transmitter sites and their customer's radio premises. We are aware that during the trials, a number of sites have been impacted by a loss of service due to poor connectivity and equipment (or at least lack of appropriate redundancy). We feel that a minimum required technical specification for connectivity & transmission equipment should be implemented to prevent this kind of occurrence taking place and to protect the business interests of the many broadcasters whose commercial programme services would rely on the robustness of the underlying host multiplex infrastructure.
- Due to DAB transmission being a highly specialist and complicated subject we feel that an official list of SSDAB transmission providers documented by the regulator that lists approved installers and support channels including ourselves would aid prospective licence applicants with guidance and choice during the research and application process. In addition to this, a program to recognise approved contractors should be put in place to keep standards high and ensure they are adhered to.
- Under Transmitter characteristics, subsection A2.24 we have noted the regulator has recommended that a maximum radiated power of 100W ERP would be sufficient except near a polygon boundary, where a directional pattern has been assumed. We do understand the reasons noted for this, however we feel that a maximum ERP of 250W would be more useful in order to more closely align these new muxes with the community/small commercial sector, yet still not come close to the existing DAB tier coverage areas.

We are also in the process of launching a new website in the coming weeks where we plan to list refreshed details of our Xmit products along with other DigiLink Connect services. In addition to this, we plan to offer a new support portal for our customers that will be active shortly after launch. Alongside our support portal, we also plan to include open sections of the site that will be free of charge for interested parties to access and aid them with free advice & technical undertakings for Small Scale DAB. Our site will be free to access and this will be available at digilinkconnect.co.uk or smallscaledab.com in the coming weeks.

To summarise, the team at DigiLink Connect are once again looking forward to helping facilitate the next step for DAB digital broadcasting here in the United Kingdom and any replies or comments to our response will be welcome via dab@digilinkconnect.co.uk

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