

Response to consultation DATA LIMITS AND DATA SERVICES ON RADIO MULTIPLEXES

I answer this consultation as a keen DAB radio listener concerned for the future of DAB and I have no connection with the radio industry other than as a listener.

Q1 - I have no position on this. TV is currently being carried without requiring conversion of the multiplex to TV so this will not have any material effect.

Q2 - No, the data limit should not be increased.

Justification of my position referring to the relevant paragraphs in the annex:-

2.1 I do not believe that this objective will be met for the reasons that I have marked out below.

2.5 Clearly there is evidence of demand for more bandwidth. Unfortunately DAB is the only platform currently at an advanced stage of implementation. Acceleration of DVB-T rollout at high power, abandonment of selling off of potential DVB-T spectrum for other uses, encouragement of combined DVB-T/DAB receivers to allow the removal of radio stations from Freeview to DAB (each removed radio station from Freeview will free capacity for up to four 64Kb DVB mobile TV channels and make DAB more popular and profitable).

2.7 There is no difficulty in providing DAB reception capability into mobile phones, it will not increase their cost especially if incorporated with a DVB-T or other DVB receiver. Reception of band III on a phone will not be as good as the reception of either UHF or L-band both of which can be provided more easily from existing mobile phone masts with considerably more capacity.

4.2 this is clearly the best proposal of the current options but a better proposal would be to reduce the bandwidth available for data since this feature is clearly being abused.

4.3 Reducing the audio quality of DAB radio still further when it is already well below that offered by for example FM radio and DVB-T radio is not something that is going to encourage the take up of DAB. Current experience shows that portable devices such as phones will not make very effective DAB receivers with the current DAB transmitter network. DAB radio use in cars (where most radio listeners are) is a big untapped market and with only two national networks stereo radio station choice on DAB is still very restricted and insufficient to encourage car manufacturers to fit DAB as standard. The use of small screen TV is not compatible with driving and this proposal will further discourage DAB take up rather than encourage it.

4.5 This paragraph does not make sense in English and appears to have mono and stereo confused in several places. throughout this document Joint stereo is referred to as stereo which is misleading.

4.10 It is not reasonable to allow a subscription service to deny access to bandwidth for services which by their nature are free to air and have to be run more economically. Clearly the reason that this consultation has come about is because there is contention for a finite amount of bandwidth, the amount of which has been defined by government policy. This is not about reallocating unused bandwidth, it is about reallocating used bandwidth currently enjoyed by millions of radio listeners to a corporation for eighteen months or more so that they can defer half a million pounds of investment.

4.12 There is the option to provide more multiplexes, either on L-band, Band III or satellite L-band. Use of other currently poorly used spectrum may possibly be considered. Freeing a 2MHz slot in band II can be considered in the long term since the stated result of this exercise is to encourage more people to switch to DAB, a much more spectrum-efficient transmission medium. Making BBC Radio 1 DAB only should just about achieve this result alone and will target the influential young age bracket that will be BT's target market in this exercise.

5.10 Because the data rate of the affected audio channels will be reduced from 128Kb to 64Kb in order to free the required extra 128Kb of bandwidth, all listeners to both of those channels will be effected because to achieve the same sound quality on a mono channel as a joint stereo 128Kb channel will require 96Kb. Clearly only reducing to this amount will require the conversion of four joint stereo services. The assumption has been made that the affected services are currently broadcast in full stereo, there are no full stereo services carried on the Digital one multiplex, only joint stereo. Therefore the statement that those listeners who use mono sets will not be affected is factually incorrect, all listeners will be affected.