

**1. Do respondents agree that DCMS should introduce an order which would allow TV services to be carried on a radio multiplex without the need for the radio multiplex to be reclassified as a TV multiplex?**

My feeling on the matter is that the multiplex has been licensed on the basis that it is going to carry digital radio. The addition of TV is piggybacking on the broadcasting technology. In calling it a TV multiplex, this changes the psychological nature of the multiplex. It will then be seen as a TV multiplex with radio services being broadcast in addition to the TV.

**I'm therefore against it being reclassified as a TV multiplex.**

**2. Do respondents agree that the data limits on radio multiplexes should be increased to 30%?**

Reading through the document, it mentions that this increase in data will be at the expense of the audio. It talks about dropping one of the channels down to mono on a permanent basis and another to mono for 18 months. At the moment, there are 8 radio stations being broadcast on the national DAB multiplex. 2 of these are currently in mono. Being speech based, this is not a problem as most of the source audio is mono. The other 6 are currently broadcasting in Stereo. All of the source audio on these channels is stereo (music). In dropping 2 of these channels down to mono, you will be reducing the quality of the output. When FM broadcasts launched in 1955, they were originally in mono. When it was available, most stations converted over to stereo as this was seen as being able to offer the listener a better service. It is a proven fact that mono FM broadcasts cover a larger area than stereo FM broadcasts, however stations still broadcast in stereo. In offering licences for community radio stations in the last few months, mono was seen as a solution to get a station on air when stereo was not an option. If it is seen at this level that stereo is very desirable, and mono is the last resort, why is it seen as perfectly acceptable on a national basis for national radio stations?

It has been mentioned that the reason for this need for increases in the data rate is for TV stations. These are to be received on mobile phones (described as "a new, innovative multi-media package including mobile TV and telephony"). Most of the operators of mobile networks already offer TV reception over 3G technology. Why is there the need to replicate these broadcasts over other platforms if it is already in use with existing technology?

**Based on these arguments, I'm strongly against increasing the data limits to 30% as this will erode the DAB radio platform.**