Your response

Question	Your response
Question 1: Do you agree with our proposals for adding requirements to the Television Technical Code and Digital Radio Technical Code relating to resilience of broadcast networks and access services?	The proposal recognises that small scale DAB multiplexes do not have the resources to match the resilience planning of local and national multiplex operators. We would expand that to say that the basis of Small Scale DAB's accessibility to small broadcasters is in large part due to deploying the most cost-effective solution, which in some locations means little or no idle resilience capacity. The proposal seems to infer that the extent of resilience may be a factor in any decision to revoke a licence, and that would seem unreasonable on a small scale DAB multiplex. We give cautious support to the proposal on the basis that it requires licensees to consider the options for resilience, but that consideration may legitimately conclude that no practical resilience is viable.
Question 2: Do you have any comments on our proposed changes to the DAB Technical Policy Guidance relating to the process of transmitter approvals? **In particular, do you have any comments on our proposed sensitivity analysis, or on whether we should require or permit applicants to provide both horizontal and vertical antenna pattern information?**	We support the proposal that Ofcom should undertake and coordinate ACI assessments, and the proposed methodology is appropriate. It removes the risk of time-consuming and costly negotiations and duplicated planning activities which ultimately fall disproportionately heavily onto small scale DAB operators. The cost to a small scale DAB operator to undertake multiple planning processes and to hire in the necessary equipment to undertake drive testing is significant in comparison to other costs, so should be seen as a final stage process, not an early requirement. We do support the ability to optionally provide antenna patterns in both planes, as in applications we've worked on, doing so would have changed the initial assessment of ACI risks. Most antenna manufacturers are able to provide digital pattern files that provide information in both vertical and horizontal planes, and they could be provided as part of the application pack.

Question 3: Do you have any comments on our proposals for investigating and potentially permitting use of the non-critical mask?	We would like Ofcom to consider permitting the use of the non-critical mask. As the costs of small (≤25W) transmitters fall, the cost of achieving critical mask becomes a disproportionately high part of establishing sites that can cover a small town or community. Allowing non-critical mask may spur the development of affordable filters and methods of achieving non-critical mask compliance. Non-critical mask is standardised as part of ETSI EN302 077, and is permitted in other European countries.
Question 4: Do you have any observations on Ofcom's processes and information we are providing and proposing to provide in relation to acceptance tests and compliance checks? Is there anything missing that would help make the process smoother or easier from your perspective?	(no response)
Question 5: Do you have any comments on the EMF, HbbTV, or document format modifications proposed in this section?	(no response)