



Chelmsford Amateur Radio Society

Established 1936

Affiliated to the RSGB

Club Callsign: G0MWT

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CARS Ref: 20051115

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Response to 'Radio - Licensing Policy for VHF Band III, Sub-band 3'

Question:

In light of the further evidence presented in this document, Ofcom proposes to allocate three blocks of spectrum in VHF Band III, sub-band 3 for local radio multiplexes under the licensing process set out in the Broadcasting Act 1996, with the aim of covering geographical areas that do not presently have local radio multiplexes. Ofcom also proposes to allocate one block of spectrum in the same sub-band for a national radio multiplex under the licensing process set out in the Broadcasting Act 1996.

Do you agree that these proposals represent the optimal use of the spectrum?

Response:

In March 2005, Chelmsford Amateur Radio Society contributed a public submission to 'Radio – Preparing for the Future (Phase 1)' and waited with interest for Ofcom's next steps. We are pleased therefore that another opportunity is available to answer the above and comment on the findings of that exercise

CARS is broadly pleased that:-

- a) Additional DAB Spectrum is to be licensed as soon as practical after RRC06
- b) That it will be under the Broadcasting Act
- c) That within the constraint of four available blocks – that the use of three blocks for local multiplexes is optimal. Ofcom is to be complimented on a diligent planning study.
- d) We have some concerns regarding the fourth block for another national multiplex – see below

However, we wish to take the opportunity to point out the following:-

- a) Every effort should be made to get a fifth block at RRC06 for national use (and that it should be under the Broadcasting Act). If obtained, it maybe more prudent to re-consult on this and the fourth block together.
- b) Too many existing stations are on existing local multiplexes are not truly local and are 'quasi national', which is not spectrally efficient, and confuses listeners in regions where multiple multiplexes can be received¹. Ofcom should remove constraints that prevent such stations moving to national multiplexes (for fear of losing their analogue licence etc), which would enable rationalisation.

¹ When DAB is received via a roof/loft aerial in Chelmsford, all seven Multiplexes can be obtained – BBC, Digital One, All three London channels, Essex and Kent – leading to quasi-duplication of some independent stations

- c) Coverage issues must be addressed for both new multiplexes and for EXISTING multiplexes. Past mistakes that have led to weak reception must not be repeated, and be corrected. All multiplexes must be planned (or re-planned) for the enhanced strengths clearly needed for portable and indoor receivers. Here in Chelmsford there is no adequate portable coverage for the Southend and Chelmsford franchise! In contrast Digital One and BBC multiplexes have been recently infilled by extra transmitters at Danbury Hill and are now very satisfactory. So many people have DAB, but with still no local stations (BBC Essex and Essex Radio)
- d) We also note no comment whatsoever in Ofcom's statements on the BBC's request for additional spectrum to raise the bit rates of its national multiplex (a popular public request) and ask that this is addressed in a positive manner. We are appalled by the innate Ofcom anti-BBC bias, which does not serve the citizen consumer. Improved audio quality by the BBC would be a great incentive for DAB take-up and in no way undermine other stations (as there would be no extra BBC services). It may also push other stations to improve their own set-ups
- e) Regarding the fourth block for a new national independent multiplex: We note with concern that serious differences appear to exist between Ofcom and Digital One which threaten the hitherto harmonious cooperation that occurred to develop/promote DAB in the UK. The UK DAB market has been uniquely successful relative to the rest of the world and we would urge this to be resolved amicably so that a better relationship continues to foster DAB development/rollout.
- f) We maintain our objection to bit rate reductions and the quality standard advocated which is far less than current FM radio. Public expectations (clearly expressed in market surveys and consultation responses) are that digital quality should be higher than analogue. The BBC is believed to be already using the enhanced encoders (as proposed for 112kbs) and they have negligible advantage for listeners.
- g) Provision should be made in the plans for seamless future upgrades to newer audio encoding standards beyond MP2 (e.g. AAC, DAB-2 etc) – perhaps as now being considered in Australia. One option would be to licence new multiplexes under the newer DAB audio standard to encourage receiver development now

John Bowen, G8DET, C.Eng. MIEE, Chairman of the Chelmsford Amateur Radio Society

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About Us

Chelmsford Amateur Radio Society (CARS – www.g0mwt.org.uk) is a vibrant club with over 100 active members holding amateur radio licences. Based in and around Chelmsford, Essex, it is nationally recognised as playing a very active role in amateur radio across a wide range of activities including social, operational and development/training aspects. The club is affiliated to the national body, the Radio Society of Great Britain (RSGB). CARS members collectively have a huge range of technical experience, operate from HF to the microwave bands, and much of its membership is from professionals in the electronics and radio field.

Many CARS members own DAB receivers and some members have worked for or assisted the GEC-Marconi (now BAES) Propagation group with early DAB trials. We thus have a keen interest in promoting this medium and improving local reception, audio quality, and services for road traffic such as TPEG.