

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Radio – Preparing for the Future (Phase 1)

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Representing (self or organisation/s): Chelmsford Amateur Radio Society

Address (if not received by email):

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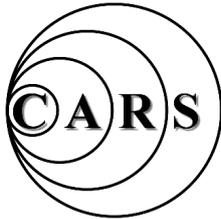
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Name	Signed (if hard copy)
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Chelmsford Amateur Radio Society

Established 1936

Affiliated to the RSGB *Club Callsign: G0MWT*
President: Harry Heap G5HF *Chairman: Chris Chapman G0IPU*
Secretary: Martyn Medcalf G1EFL *Treasurer: Brian Thwaites G3CVI*

CARS Ref: 20050306

Web Address: www.g0mwt.org.uk

6-March-2005

Response to Ofcom 'Radio - Preparing for the Future'

Introduction

Chelmsford Amateur Radio Society (CARS) 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 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 and operate from HF to the microwave bands. With roots going back to the 1930s, the club draws much of its membership from professionals in the electronics and radio field.

Chelmsford Club Members, some of whom have worked for or assisted the GEC-Marconi Propagation group with early DAB trials have a keen interest in promoting this medium and improving local reception and quality.

Many of our members also have to contend with traffic in the A12 & M25 area, where radio traffic broadcast bulletins and other data are a key driver aid.

It is on this basis that we enclose the following responses to the Ofcom Radio consultation

Murray Niman G6JYB, MIEE, CARS Committee Member

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

Ofcom: Radio- Preparing for the Future
Consultation Questions and Answers

1. Do you agree with our proposals to use formats as the primary tool of regulation for analogue commercial local radio?

No Comment

2. How do you think the objective of ensuring the provision on commercial local radio of a high quality news service, including local and national news, is best achieved?

- Should stations be allowed to use news hubs to allow them to operate in the most operationally effective way?
- Do you agree that we should include a statement in the localness guidelines to the effect that, in order to provide a comprehensive local news service, each station must provide direct and accountable editorial responsibility, based within the licensed area, for the provision of a news service equivalent at least to full time professional journalist cover for all of the hours during which its licensed format specifies that it will provide local news programmes?
- Is there a better way to achieve the objective that focuses more on output rather than input regulation?

A balanced approach is needed between the economy of news hubs for smaller stations and the need to maintain/inject localness on regional/local radio. We agree that on a case by case basis that some guidelines on this should be included, and that stations are accountable for what is broadcast.

3. Should stations be allowed to decide for themselves how much programming they automate?

Total removal of automation limits will encourage a decline in interactive programmes, interviews, phone-ins etc. This may be fine for low-cost Top-40 type stations with automated play-lists, but some controls seem prudent for most stations.

4. Should the requirement for a station's studios to be based within the measured coverage area be relaxed to require the station to be based within the licensed area?

Yes. Some exceptions may also be necessary for Highland/Island locations as well

5. Do you agree that a station's local hours, as defined by its format, should include local material, but that, outside of these hours, stations should be free to share material with other stations on a network basis as they see fit?

No Comment

6. Do you agree that each station should be required to maintain a format and localness file, available both at its premises and online, which demonstrates how it is meeting its obligations?

Yes – Localness needs to be measured/assessed, preferably by consistent metrics.

7. Do you agree with our revised localness guidance, which sets out the factors stations should take into account in providing local programming?

No Comment

8. Do you agree with our proposals to allocate more spectrum in VHF Band III for DAB-compatible use (subject to spectrum clearance and international agreement) in the following way: - Three blocks to provide local multiplexes to those areas which currently do not have their own local multiplex and some areas which already have local multiplexes?

- One or two blocks for national coverage (depending upon whether four or five blocks of spectrum are available in total)?

More DAB Spectrum is needed, but the Ofcom suggestion is too prescriptive. For example we could conceive of the need for 3 National multiplexes – An extra BBC one, an extra Independent one, and a third one which may be highly data orientated for innovative applications

9. Do you agree that the proposed local DAB digital radio multiplexes should be awarded as Broadcasting Act licences?

No comment

10. Do you agree that the frequency blocks proposed to be allocated to national coverage should be awarded under the terms of the Wireless Telegraphy Act only (i.e. without the need for a Broadcasting Act licence)?

No, we have great concerns over this.

Tim Gardam wrote in his review of the BBC's digital radio services that, with regards to DAB spectrum and capacity: "The commercial sector is agreed that the BBC should have no more space", and that the BBC are extremely unlikely to win an auction when they're up against the commercial radio groups. This is despite the fact that the BBC have said that they would like to acquire more DAB capacity to improve the audio quality of their stations and not more channels (ie not create additional competition). Ofcom's proposal would make it almost certain that the BBC would not be allowed to acquire any additional capacity to improve quality or data services/EPG/TPEG.

To quote Ofcom's own document, licensing the national DAB multiplexes under the Wireless Telegraphy Act "would not necessarily have a requirement to broadcast any radio services". So, whoever wins the auctions would be free to use the whole capacity for subscription or pay-per-view/listen data services, thus not providing a single additional radio station. This is clearly ridiculous and should not be contemplated

11. What demand do you envisage there being for nationally-allocated DABcompatible spectrum?

Ofcom should recognise previous market research and the earlier Band-III consultation inputs which indicate that Quality relative to FM is a strong motivator for the public. This release of spectrum is a key opportunity for underpinning future Digital Radio Switchover and enhanced services such as EPGs, TPEG for Road Traffic data etc. Ofcom should consider future added value of Digital and not just the residual value of the AM/FM bands for re-sale.

The comparison with Freeview and Ofcom's clear anti-BBC bias in this consultation and other inconsistencies is alarming. Without doubt Digital TV Switchover is being driven by the BBC who have benefited greatly from have a second TV multiplex for providing a robust high quality multichannel system with interactive/data capability

In contrast on DAB, the BBC services (along with notable efforts by National-One) have been a great attraction for consumers. National-One have excess capacity which they struggle to rent out. However the BBC (Radio 5-Live, 6 and 7 etc) struggle to fit into their current multiplex and have compromised bit rates or loss of stereo. If BBC capacity were expanded these services could operate with higher capacity, innovative services and top audio quality to continue to drive digital radio sales, which in turn would benefit the independents. Digital Local radio is not a prime driver, other than the bonus of clear reception for AM 'Gold' stations compared to medium wave

Ofcom could miss a golden opportunity to drive digital radio take-up based on Quality and Added Value Service 'pull', just as the BBC have greatly contributed to Digital TV

12. Do you think the limit on non-programme related data carried on each commercial DAB digital radio multiplex should be raised from the current limit of 20%? If so, what should the limit be raised to? What do you envisage extra capacity would be used for?

20% is equivalent to upto 3-400kbits/s on a single multiplex and is probably reasonable for now, but a flexible attitude should be taken if a good publicly accessible service came along. We are opposed to large amounts of data capacity being made available to private/subsription services, which would effectively rob DAB from the general public.

13. Do you think the limit on non-programme related data (including radio) carried on each commercial digital terrestrial television multiplex should be raised from the current limit of 10%? If so, what should the limit be raised to?

The limit should be such that it is not greater than one video slot – a limit which may be multiplexer technology dependent.

14. Do you agree with the proposal to abolish the minimum bit-rate limit for DAB digital radio and replace it with a co-regulatory system akin to that applied in television for picture quality?

No. Ofcom's proposal not only lowers the already-low bit rates from 128 to 112kb/s, but also proposes a lower audio quality level that would be at least one-diff point less than FM radio. This would totally undermine one of the main publicly quoted reasons for buying DAB in the first place. The BBC is on record that it wants to have the capacity to raise bit rates to avoid the compromises on its multiplex.

In addition, many independent stations seem to have very poor audio setups in the studios or coders which give great variations in volume levels, expose harshness, compression and distortion issues on 128kb/s. These problems would only get worse on 112kb/s. DAB will only prosper if it has reasonable technical standards to underpin its quality.

15. How should Ofcom allocate further MW (AM) frequencies between commercial and community radio?

If the long term goal is to encourage FM and DAB (and in future DRM for LW/MW) then due regard should be given to technical preferences as well. In this regard less critical community applications may benefit more from MW, whilst commercial interests may find DAB (and its interactive advertising possibilities etc) more appropriate.

16. How might we accommodate the advertisement of new commercial MW licences into our existing FM licensing plans?

No Comment

17. Do you agree with the proposed strategic framework for the future regulation of radio, which aims:

- To enhance choice, diversity and innovation for consumers at the UK, national, regional, local and community levels
- To secure citizens' interests through the provision of radio designed to meet public purposes.
- To do this with as little intervention in the market as possible, consistent with meeting our objectives, in a way that is as consistent as possible across media and across platforms.

Not convinced. DAB needed significant intervention/collaboration for it to be a success in the UK

18. How important do you think it is to develop a set of public purposes for radio and what should those public purposes be?

- Is the set of public purposes already developed for television a useful starting point?
- What else should be added or what should be taken away?
- What is the relative importance of the different elements?
- Are there things that are better delivered by radio than other media?

A comparison with TV may be useful, but for example TV is irrelevant to drivers in contrast to Radio (along with Traffic info)

19. To the extent that it is possible to comment at this stage, how do you think those public purposes are best delivered?

- How important is plurality of provision of the public purposes for radio?
- How much of what commercial radio currently does could be classified as meeting public purposes?
- How well does the current market structure help fulfil public purposes in radio?
- Should the BBC's radio archive be made available more widely to commercial players to provide alternative radio services?

Plurality is important. Very little public service broadcasting is evident on commercial radio. In this latter regard a comparison with TV may be interesting. If Ofcom want to encourage Public Service Broadcasting, only the BBC effectively have the resources and willingness, but should not be denied adequate spectrum to undertake it.

BBC archives should be accessible but only in a manner agreeable to the BBC whose IPR it is.

Additional Comment on DAB Technical Coverage

Our members live within the Southend & Chelmsford Franchise. I can be on the top of Danbury Hill a few miles outside Chelmsford and can find that I don't get reliable reception of S&C, yet I can get Kent and London (plus the BBC and National-1 multiplexes) as there is not a Chelmsford/Danbury transmitter!

Ofcom planners should give consideration to additional transmitters and higher power levels which would benefit indoor kitchen radios, handheld/portables and cars.