

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Radio – Preparing for the Future

To (Ofcom contact): Peter Davies

Name of respondent: Andrew Penfold

Representing (self or organisation/s): Self

1. Do you agree with our proposals to use formats as the primary tool of regulation for analogue commercial local radio?
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?
3. Should stations be allowed to decide for themselves how much programming they automate

A: Yes, listeners can switch stations if automated content bothers them

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?

A: No

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

A: Yes, I see no problem with networks sharing content outside of local hours. I would especially welcome sharing of specialist music shows across networks to raise awareness of different musical styles across the country. E.g. Shows like Hed-Kandi on JazzFM, Slammin' Boys on Galaxy made accessible to more people. And more diverse specialist programming, showcasing other marginalised musical styles.

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?

A: Yes

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

Secondly, how can we best facilitate the growth of digital radio? We would welcome views on the following questions:

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)?*

Yes.

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

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)?

A: NO, the Broadcasting Act licence should apply to all new spectrum for DAB

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

A: Very little. There is a place for multimedia applications, called The Internet. Broadcasting of paid-for downloadable content is a huge waste of spectrum, the internet is far more adapted to this. The idea of "press the red button to download the currently playing track" is compelling. However, the downloaded track would inevitably be of an even lower quality than the streamed version (playing on the radio), unless an advanced codec was used, requiring a link to a PC to play it.

Multi-channel audio (outside the movie world) is in its infancy. I hear that most DVD-A and SACD multi-channel productions use the extra channels to place instruments all around the listener in a most un-nerving fashion. The channels should be used to convey the feeling of space using reverb. I can't envisage any demand to hear radio presenters' voices spinning around our heads and currently the number of multi-channel audio productions that could be played on a radio-like service is very limited.

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?

A: No No No, absolutely not. The multimedia "features" provided would be largely "gimicks". Those that would enhance digital radio like still images of album art or the presenter's face, or a web-cam shot of the studio, could easily be accommodated with the low bit-rates currently available, especially if any HTML (or WML) was compressed and JPEG and PNG were used for graphics.

Electronic programme guides are a good idea - again, text and times are highly compressible data.

The idea of mobile-phone operators using radio-spectrum to "broadcast" download-once content is wasteful and frankly quite repulsive to my mind. They've got their 3G licences, what more do they need?

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?

A: I think that a distinction should be made between radio and "other" non-programme related data. I would welcome a greater choice of radio stations on freeview (if it did not impact on the quality of TV stations)

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

A: No No No, absolutely not. I think that (1) The minimum bit-rates should be maintained as they are, and (2) A co-regulatory system should ALSO be implemented.

(1) The new MP2 encoders that are becoming available should be employed to increase the sound quality available on DAB, without impacting on the current choice of stations. Although diff-grade experiments have been done, they will likely have used a nice crisp CD as the sound source, not a CD ripped into a play-out system using a lossy codec, then put through a mixing desk and an optimod (or worse dynamics compressor) and then normalised to near 0dB resulting in a clipped output from the MP2 decoder. (This being a worst-case scenario, but quite likely in the case of a simulcast FM/DAB station.)

Reducing stereo stations to 112kbps joint stereo will allow ONE extra joint stereo station per multiplex. Use new spectrum to create more choice, not further compromised sound quality.

(2) Bit-rates are the main factor for sound-quality in DAB, but by no means the only factor. As mentioned above, over-use of dynamics compression makes the MP2 encoder's life difficult - less data can be discarded as psycho-acoustically inaudible, so quality suffers. Simulcast FM/DAB stations are particularly guilty of this - the desk output should be split for DAB and FM and the dynamics compression adjusted to be optimal for both broadcast methods individually. Ideally, the DRC system should be employed to give listeners the choice between a compressed signal for the car and one with a full dynamic for home listening.

Thirdly, in terms of future licensing:

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

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

For consideration in phase 2 of this review, we would like to raise questions about the overall strategic framework for radio, both commercial and public sector, and the public purposes of radio. We would welcome views on the following:

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.*

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?*

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?*