

## Your response

| Question  | Your response  |
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| <p><b>Question 1: Should Ofcom exercise its discretion to consent to the application to vary the Winchester small-scale multiplex licensed area, with regard to the statutory and policy considerations set out in this document?</b></p> | <p>Ofcom should not exercise its discretion, given that this proposal is not in line with the established Ofcom policies and procedures.</p> <p>Firstly, Ofcom has referred to the name of multiplexes, in this case “Winchester”, which suggests a direct affinity to the area served. Ofcom has rejected license applications on the basis they do not consider an “affinity”, with the areas being covered.</p> <p>The only relevant coverage is the contiguous coverage which forms a homogenous island of coverage.</p> <p>We believe that the loss of coverage is unacceptable and will deprive listeners of a service that they would otherwise expect. Under previous Ofcom decisions that less than full coverage of the entire area substantially reduces viability.</p> <p>Ofcom does not license sub-par FM frequencies, so why is a sub-par service provision acceptable for SSDAB? Less than full coverage is clearly highly undesirable. The best solution is to readvertise this multiplex, noting it is currently off air anyway.</p> |
| <p><b>Question 2: With reference to our impact assessment, do you agree with our assessment of the potential impacts of approving this application?</b></p>   | <p>Ofcom’s focus should be on the needs of the listeners in each area, and their ability to receive services as implied by the name of the service, and in line with other DAB services that are available in the area.</p> <p>We believe that the already inadequate coverage, being made worse by this proposal, is a less favourable solution than fully readvertising this multiplex which would allow alternative providers to deliver full coverage across the Winchester area.</p> <p>Ofcom needs to carefully consider whether it continues to license these multiplexes when they only offer partial coverage. Ofcom must also consider the alternative platforms, such as FM and AM allocations, and restart the process of licensing independent and community analogue licences which can provide better coverage.</p>   |

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