

Question	Your response
<p><b>Question 1: Should Ofcom exercise its discretion to consent to the application to vary the Stirling &amp; Falkirk small-scale multiplex licensed area, with regard to the statutory and policy considerations set out in this document?</b></p>	<p>Confidential? No</p> <p>We believe that OFCOM should only allow the power increase at the Central FM Stirling studio site. We believe that the power increase at the Earl's Hill site will cause significant overspill into the proposed Dunfermline &amp; Kinross SSDAB area, and thus should not be approved.</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>Confidential? – N</p> <p>We will address the two main points of the Impact Assessment: Overspill coverage into Dunfermline and the improved 'Commercial Viability' of the multiplex.</p> <p>Our main concern over these proposals is the 'overspill' into the proposed Dunfermline &amp; Kinross SSDAB area. We have already approached OFCOM after we returned the East Fife licence award over 'area viability' and suggested that they create a SSDAB multiplex licence area called 'SW Fife' and to include Dunfermline &amp; Kinross; Kirkcaldy &amp; Glenrothes (which was also returned under viability concerns) and the Methil &amp; Leven areas of the old East Fife licence area. This would give a viable population coverage of just over 200,000 whilst remaining within the regulatory limit of 40% coverage of the local relevant multiplex (Edinburgh). If Stirling and Falkirk were to effectively remove 51,000 people from that licence area based on a 63dBu calculation, it would make the proposed area again marginal for viability. In our experience a licenced area needs a minimum of 150,000 population to be commercially viable.</p> <p>Our secondary concern is that Central FM state that the extension of coverage would improve the commercial viability of the Stirling &amp; Falkirk multiplex area. We would refute that argument as we believe that under the current and future proposals the Stirling and Falkirk SSDAB multiplex will never be viable on a stand alone basis under it's current transmission cost basis.</p> <p>Compared to DABStream Ltd's (the other applicant for the multiplex licence in 2022) transmission proposal which had a cost effective two transmitter network from the start, this will be Central FM's third transmission plan since the launch of the multiplex in November 2023. It</p>

Question	Your response
	<p>was obvious to us that the original low power output of Earl's Hill was not going to cover the licenced multiplex area from the outset, with large swathes of the area having no practical coverage (i.e. Grangemouth). The addition of a small transmitter at Central FM's premises in Stirling increased the coverage in the Stirling locality, but still left poor coverage outwith the city. We actually have no objection to an increase in power on the Stirling transmitter as due to its low height a.o.d. there would be no 'overspill' outwith the current licenced area and there should not be any cost implications involved. (provided Central FM had the foresight to actually install a larger transmitter than required in the first instance at their studio premises.).</p> <p>This third change in under two years will definitely see an increase in costs to Central FM if the Earl's Hill power increase is approved, due to the nature of a standard Arqiva TBC, but to state that it would improve the commercial viability of <b>the multiplex</b> is a 'Red Herring' given that Central FM already operate a robust pricing structure designed to discourage DSP licenced radio stations from operating on the multiplex. Indeed apart from one small group of stations that have a sales arrangement with Central FM there is not a single DSP station upon this multiplex, which in our view has not generated an increase in listener choice which is one of the basic tenents of the Small Scale multiplex licencing regime. We believe that if these power increases are approved this will give Central FM an excuse to raise their carriage rates again to further discourage radio stations to seek carriage upon this multiplex, and thus reinforcing their local commercial broadcasting monopoly.</p>