## **Your response**

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Question 1: Do you agree with the planning principles and methodologies that we will use in our work to refine the coverage area plan for small-scale DAB?	Yes. The chosen methodology provides a fair means to identify the target areas along with the associated adult populations.
Question 2: Do you agree with our proposed approach to the required technical licence conditions for small-scale radio multiplex services, and the proposed amendments to the Digital Radio Technical Code?	No, the proposal to exclude MPEG1 layer 2 will disadvantage listeners using older DAB radios from the small-scale service. Ultimately, it should be down to the service provider to use MPEG1 layer 2 or HE AAC v2 (or both) with a preference for migrating the audience to DAB+ only.
Question 3: Do you agree with Ofcom's proposed approach to setting the level of reserved capacity for C-DSP services on small-scale radio multiplex services?	No. As the community sector is of a different size in each polygon, it seems inappropriate to have a fixed number of slots. We believe that it would be better to be able to flex the number to meet the local requests.
Question 4: Do you agree with the factors we are proposing to take into account of in deciding the order and timescale in which Ofcom will advertise small-scale radio multiplex licences?	Yes, we welcome the fact that Ofcom has prioritised the licensing of small-scale DAB services ahead of further local multiplex licensing. We hope that this may be reasonably interpreted as early licensing in each of the 4 nations and particularly within Northern Ireland as it did not have the benefit of a trial multiplex.
Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?	Yes, this appears to be a logical method. We also would like to support the statement "is an extremely important part of the application". In addition, the use of local knowledge and experience is a valuable asset to the process.
Question 6: Do you agree with our proposed approach for assessing the ability of applicants to establish their proposed small-scale radio multiplex service?	Yes, but this should be "sector neutral" in that applications may or may not be associated with existing community services, thus opening the door to entrants with the necessary skills.
Question 7: Should Ofcom require that the studio of a C-DSP licensee be located within the coverage area of the small-scale radio	Yes, this is an important requirement, as the ethos of community radio is to provide social gain through access and service to a defined community.

multiplex service it plans to broadcast on? Please explain the reasons for your view.	Equally, it should not be possible for a community licensee to become a large local or even regional service through carriage in a number of polygons.
Question 8: We propose that holders of corresponding analogue community radio and DSP licences apportion their income equally across their licences, unless there are compelling reasons why a different apportionment is reasonable. Do you agree with our suggested approach?	Yes. It is vital that the income model is transparent.
Question 9: Do you agree with our proposal that a prospective C-DSP service provider will be able to apply for a C-DSP licence once we have invited applications for the small-scale radio multiplex licence upon which their proposed C-DSP service is intended to be provided?	Yes, this is a perfectly logical approach.