Your response

Question	Your response
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.
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 requirement to broadcast on DAB+ may not be necessary or spectrum efficient in less populated areas, such as rural locations, where demand from C-DSPs and DSPs may not be sufficient to occupy all channels and therefore the advantages of DAB+ could be outweighed by the benefits of reaching a greater number of listeners on DAB.
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?	Yes.
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.
Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?	Yes.
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, with reservations - Ofcom should give particular positive weighting to applicants whose participants include persons or organisations who already have demonstrable experience of delivering a community radio service in the locality proposed. This indicates real-world experience of implementing or commissioning transmission services and of negotiating site access arrangements with relevant local site owners. This criterion should also take into additional account the opportunities for co-locating with existing FM

community radio.

In making an award decision Ofcom must also balance responses on this criterion and the technical plan with responses to the 3 other criteria listed. In particular, the third criterion (ownership or participation in the applicant by a potential or actual C-DSP licensee) should carry equal weighting in an award decision alongside each of the other criteria.

The selection process may reasonably set thresholds in relation to the essential criteria but, provided such thresholds are met, all criteria (essential and desirable) should be considered equally in making an award decision where there are competing applications.

Question 7: Should Ofcom require that the studio of a C-DSP licensee be located within the coverage area of the small-scale radio multiplex service it plans to broadcast on? Please explain the reasons for your view.

The requirement that the studio of a C-DSP licensee is located within the coverage area of the small-scale radio multiplex service on which it plans to broadcast may cause issues for some stations who are not necessarily defined geographically or whose broadcast area does not match that of the proposed multiplex. Ofcom should allow for exceptions to this rule where justification can be provided.

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.

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?

No, existing CR licence holders should be able to apply for a C-DSP licence immediately the C-DSP licensing framework is in place. Existing CR licence holders should be able to seek certainty that they have been accepted for a C-DSP licence before potentially committing resources in apply to be an SSDAB mux operator or negotiating to participate in or to be carried by an SSDAB mux operator. Ofcom should offer a fast track route whereby an existing CR licence holder can obtain a C-DSP licence. Annual fees for C-DSP licences should commence only once the C-DSP begins carriage on an SSDAB mux.