

Your response

Question	Your response
<p>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?</p>	<p>I agree with Ofcom's approach.</p>
<p>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?</p>	<p>In general I agree with Ofcom's proposed approach.</p> <p>Mandating the use of DAB+ format transmissions, while logical for many areas where there is high demand from programme services providers, could lead to unused capacity in less densely populated areas.</p> <p>Should a multiplex not be "full" carrying some or all services in DAB format would ensure the greatest accessibility amongst listeners with older receivers.</p> <p>I would prefer the choice of transmitting DAB or DAB+ being left to market forces</p>
<p>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?</p>	<p>I broadly agree with Ofcom's proposed approach.</p> <p>In areas where there is high demand for carriage from C-DSP holders I think that priority should be given to applicants that agree to guarantee the greatest C-DSP capacity on their multiplex.</p>
<p>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?</p>	<p>Yes I agree.</p>
<p>Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?</p>	<p>Yes, I agree.</p>

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 in general.

I strongly feel that protections should be in place to protect the interests of smaller broadcasters.

Within this category of smaller broadcasters I include current and aspirant community radio licence holders and other very small scale broadcasters such as student and hospital radio broadcasters who may currently operate via long term RSL licences, internet or a variety of 'closed circuit' systems. In addition I include small independent commercial radio operators in this category.

I believe that the best solution to protecting the interests of such small scale broadcasters is for the multiplex licence to be held by a not-for-profit entity made up of an consortium of these small scale broadcasters.

Therefore I would propose that Ofcom should give priority to applications from such non-profit syndicates of current community and small scale radio operators, rather than one single C-DSP operator or third party commercial company.

Opportunities for co-locating with existing FM services should also be taken into account.

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.

This local studio should only be a requirement of C-DSP who define their service as a "geographical community".

Many of the smallest operators, such as student and hospital broadcasters make extensive use of syndicated and "home studio" programmes. I agree that a local base is essential to ensure a local connection, flexibility over locally produced hours is essential. For instance student radio stations often are unable to produce any content from their local studio out of term time.

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 I agree in general.

I also believe that there needs to be some flexibility in stations providing “opt out” programmes on their different platforms. As long as income generated is gained on the basis of support of the whole operation a simple apportionment should be permitted.

Operators who do not hold analogue community radio licences, but do operate on a “non-profit” basis should also be permitted to split their income between the services.

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, it will be in the interests of potential C-DSP services to not have to apply and pay licence fees before the licence for the multiplex on which they may wish to broadcast has even been advertised or even launched.