

Your response

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<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>Yes – we agree with the principles employed in your coverage planning process for small scale DAB.</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 terms Yes, provided they don't mean small scale operators face more regulation than other operators. And while we will almost certainly want to operate in DAB+ from the outset, we sympathise with those wanting the flexibility to selectively use DAB for the time being. Should there instead be a target date in a few years time by which time all SSDAB output needs to be broadcast using the DAB+ standard?</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>Yes – we agree with Ofcom's proposed approach in this regard.</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 – we agree with Ofcom's approach here.</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 – we agree with Ofcom's suggested approach for assessing small scale DAB technical plans.</p>
<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?</p>	<p>Yes - we agree in general – but feel Ofcom should give positive weighting to applicant groups including people or organisations with direct experience of delivering a community radio service in the coverage area proposed. Local knowledge and experience of commissioning actual transmission facilities is invaluable, especially in light of the likelihood small scale DAB transmitters will often be co-located at a wide variety of analogue community radio TX sites, rather than masts owned by larger scale broadcasters. Therefore skills like an ability to negotiate site access</p>

	<p>arrangements with local owners will be especially relevant.</p> <p>We also agree with the notion that In making an award decision Ofcom should also balance responses on this criterion and the technical plan (Criterion 1) with responses to the 3 other criteria listed. In particular, we feel 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.</p> <p>Notwithstanding Ofcom's observations in this respect that the third criterion is considered desirable not essential, while Ofcom may wish to set thresholds of technical viability (Criterion 1) and of viability (Criterion 2), provided such thresholds are met, there is a widely held view in our sector that award decisions should be based on scoring against all five criteria with equal weighting in order to reach a fair decision between competing applicants.</p>
<p>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.</p>	<p>Yes – while we agree this general principle should apply in the majority of situations, Ofcom should allow flexibility in exceptional circumstances, provided adequate and valid justification is given.</p>
<p>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?</p>	<p>Yes – we agree with this approach in principle but would point out that broadcasters who simulcast face higher transmission costs. Therefore Ofcom could ask DCMS to better support simulcasters through modification of the fixed revenue allowance, especially in light of the fact they are helping promote the DAB platform to FM listeners, helping to drive listener adoption of digital broadcasts.</p>
<p>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?</p>	<p>Yes – we agree with this approach. Ofcom might also consider allowing community licencees with a DSP licence they no longer need to swap it for the appropriate C-DSP licence at no cost.</p>