

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?	No answer.
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 answer.
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>Ofcom's proposed approach to setting the level of capacity reserved for C-DSP services appears reasonable.</p> <p>However, in estimating the level of reserved capacity for each multiplex, in addition to the sources listed in paragraph 4.23 of the consultation, the HBA would ask that Ofcom takes into account the number of hospital radio stations within the licensing polygon.</p> <p>Despite publicity of Ofcom's consultation by HBA, unfortunately the level of awareness within hospital radio stations of the importance of expressing an interest was low. During the intervening period, however, knowledge of, and interest in, Small-Scale DAB within the hospital radio sector has grown, spurred-on also by developments within the NHS resulting in bedside entertainments systems being withdrawn from hospital wards, further pushes to treat more patients outside the traditional hospital environment, and an increased emphasis on prevention. A small number of hospital radio stations have taken advantage of model charitable objects that include health promotion to apply for and launch analogue community radio services. HBA expects there to be significant interest in Small-Scale DAB from the hospital radio sector over the coming few years, and would ask that Ofcom ensures that there is sufficient reserved capacity to facilitate any hospital radio station that wishes to</p>

	<p>broadcast a health and wellbeing-focused service on Small-Scale DAB to do so.</p> <p>A list of HBA member stations, which represents the vast majority of hospital radio stations in the UK, can be found on our website – www.hbauk.com.</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>No answer.</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>HBA has concerns about the required level of detail required to be submitted as part of the technical plan. It appears to be much greater than was previously required for AM/FM licence applications, and use of a specific spectrum planning tool.</p> <p>This is likely to mean that existing hospital radio stations will be unable to submit an application to operate a multiplex, despite the Community Radio Order expressing the desirability of awarding multiplex licences to prospective C-DSP licensees, or consortia including such.</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>No answer.</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>No answer.</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>No answer.</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</p>	<p>It would appear strange, given that a C-DSP licence is restricted to a specific multiplex, that</p>

have invited applications for the small-scale radio multiplex licence upon which their proposed C-DSP service is intended to be provided?

Ofcom would open invitations to apply for these licences prior to having awarded the corresponding multiplex. Applicants would be paying the £250 application fee and, if successful, the £100 annual fee, for a licence that it was impossible to use.

A more sensible licensing regime would be for Ofcom to open applications for C-DSP licences immediately on awarding the corresponding multiplex. This would mean that applicants knew there was a possibility of using the licences they were applying for, and would also ensure that Ofcom's licensing team was not wasting its time assessing applications for licences which cannot be utilised in a timely fashion (if at all).