

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 believe your approach is sensible and practical with one exception can be illustrated, for example, by the proposed polygons for the Teesside area.</p> <p>While one can appreciate the intention to ensure that ‘small-scale’ DAB licences remain focussed on areas smaller than the original DAB services, I am not aware of any likely demand for a Stockton-on-Tees station not to also cover Middlesbrough (note the spelling by the way) or vice-versa.</p> <p>This proposed arrangement appears to have been created simply to satisfy the 40% limitation, it introduces technical and financial complexity without offering any public benefit. A single licence for the three heavily overlapping and integrated boroughs of Redcar, Stockton and Middlesbrough would be more appropriate - although I accept this would equate to 50% of the Teesside local MUX population.</p> <p>I welcome your statement in paragraph 3.25 of the consultation document with regard to Ofcom’s flexibility to exceed the 40% figure: <i>“For example, it may be that complying rigidly with the 40% figure in a particular case would undermine the editorial appropriateness of the area covered by the small-scale radio multiplex service and/or the ability of the area to satisfy the demands for carriage from C-DSP or local DSP licence holders. This may be relevant where strict adherence to the 40% figure would inevitably involve either excluding a significant part of the population of a town, or artificially dividing an already relatively small urban area for which it is clearly appropriate for such services to cater, in a way that would make the scope of the licence area significantly less attractive for both listeners and programme service providers”</i>.</p> <p>While it appears that a case could be made for combining the suggested Stockton-on-Tees and Middlesbrough and Redcar polygons by citing the above considerations (and I know it will be by several applicants) the example highlights a more general issue. The blanket 40% figure does not take into account the considerably</p>

	<p>differing size of the first-generation 'local' digital multiplex areas. 40% of the population in original DAB areas such as London, Birmingham, Manchester or even 'Herts, Beds & Bucks' can equate to a small-scale area in excess of 800,000 adults. It is plainly not the case that, in a region where the original local multiplex served a much smaller population the economies of running a small-scale service within that area will be proportionately reduced, indeed the opposite could often be true due to reduced demand for the smaller population.</p> <p>A permissible small-scale multiplex licence in the Manchester area can serve a population larger than the total number of adults in the original full-scale Teesside local multiplex area (800,600)!</p> <p>I suggest that Ofcom should indicate that it will use its flexibility to be generally more inclined to permit larger SSDAB areas where a strict application of the 40% rule would result in an overlap population of fewer than, say, around 400,000 adults.</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>YES</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</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>In general YES. However I am not clear why population size should be relevant. For example it could be argued that SSDAB will have significant impact in non-metropolitan areas where an early roll-out of new (and perhaps more relevant) radio services will be valuable and appreciated. Less competition for licences in such areas may also simplify Ofcom's workload enabling some applications to be dealt with very rapidly.</p>
<p>Question 5: Do you agree with our proposed approach for assessing the technical plans</p>	<p>YES</p>

<p>submitted in small-scale radio multiplex licence applications?</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. This seems reasonable and straightforward.</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. As the C-DSP licence will permit access to reserved capacity on a single small-scale multiplex it is reasonable to require that the majority of programming should be sourced within that multiplex area. Programme providers wishing to broadcast across a wider area, or to a community of interest in a number of scattered areas, will be able to bid for the unreserved space on SSDAB multiplexes. The requirement to ensure C-DSP programme production exists within each local area will provide the further benefit of creating and maintaining broadcast production experience, work opportunities and facilities in communities across the UK rather than in a limited number of metropolitan centres.</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</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. It is difficult to see how a coherent C-DSP application could be drafted before detailed proposals for the relevant multiplex are known. It is very likely that many SSDAB multiplex applications will be submitted following consultation with potential C-DSP service providers and these licence application processes can most sensibly proceed in parallel.</p>