

## 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?	Disagree. For example, the Teesside area is a contiguous area of town next to town. The 2 main towns of Middlesbrough (please note misspelling on your documents) and Stockton, along with Thornaby, Billingham and Ingleby Barwick abut each other, separated only by a river. They are effectively in a bowl. The area has a distinct identity as "Teesside" and the increased area "The Tees Valley" has its own elected Mayor. Therefore I disagree with proposed coverage areas, that effectively split Teesside in two. Indeed to split Middlesbrough from adjoining Stockton and create a coverage area by adding Redcar, which is up to 10 miles away, fails to take account of local geography, local identity and indeed a straightforward engineering plan (as Teesside is in a bowl, there will be significant expense involved in the planning and engineering of a directional signal for both). I believe this decision is based on the recommendation that SSDAB should only cover 40% of an existing DAB coverage area. And it was downsized to 40% in the past year. This has effectively made you cut Teesside in two as Middlesbrough plus Stockton is now over 40%. I would propose in this case and with the circumstances outlined, that you exceed your recommendation and combine Middlesbrough and Stockton, two towns separated by the width of the River Tees into one licenced area. It would be at your discretion if you wish to include Redcar. If it stays as it is, it completely ignores important local factors, trying to create a split in a contiguous area.
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?	Yes

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, the sooner the better. As an applicant for the original 10 small scale DAB trials, I would welcome this soonest.
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. As an owner/operator of around 50 licences by companies I own; full scale commercial, LPFM, LPAM and RSL, I think the process is now less onerous than it has ever been.
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.	Yes if the current plan remains valid. This should be dictated by studio location, rather than the AM/FM transmitter coverage (MCA). If by a quirk of topography, the C-DSP's coverage reaches into one or more SSDAB areas, then the operators of a number of multiplexes have a commitment to offer a channel at no charge. As Ofcom is considering power increases and relays for a significant number of CR licences, this will push coverage beyond the core areas, where it seems likely a studio would be located and would encroach onto other SSDAB multiplexes. This would be an added complication and liability for SSDAB operators, at a time when viability of the new wave of multiplexes is unproven. This would be an extra burden for new operators.
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	Yes.

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?