

## Your response

Question	Your response
<p><b>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?</b></p>	<p>Yes, no issues.</p>
<p><b>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?</b></p>	<p>No, DAB+ shouldn't be forced as the only option.</p> <p>Whilst DAB+ should be preferable as it will enable more services to be supported on the multiplex, it shouldn't be mandatory as it could restrict audiences.</p> <p>We don't know how many of the current DAB radio out there are also capable of receiving DAB+. I've anecdotal evidence of people with DAB radios that don't have DAB+ and also that have a DAB radio that could be upgraded but required a technical skill above that of the owner.</p> <p>Tesco's who I think is still one of the leading supermarkets is selling their own brand DAB radios cheap. However these radio's are not digital tick compliant and are not able to receive DAB+</p> <p>Ofcom, Government and the industry need to do more to push for all radios to be digital tick compliant.</p> <p>I have concerns that if community radio stations are forced to be DAB+ that might leave behind an audience that wont be able to listen to them.</p> <p>This is especially important to minority and deprived communities who often don't have a voice via the main stream media, and are best served by community radio. However, again do we know not only the DAB but the DAB+ ownership for these communities, could we end up with communities left behind because of DAB+?</p>

<p><b>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?</b></p>	<p>No I don't agree, however I have an issue with the legislation.</p> <p>It is a real shame that the legislation sets the minimum of capacity for 3 C=DSP's because there might be in some areas only demand or interest from 1 or 2, and that would mean that capacity has to be reserved that will never be used and thus be wasted that could otherwise be used for other services, and especially services that could generate revenue to support the multiplex or other not for profit ventures if run by the community radio license holders.</p>
<p><b>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?</b></p>	<p>No, I think an area by area approach is not ideal. Didn't the last full community radio round take at least 4 years?</p> <p>Ofcom should be empowered and provided the resources so that if they are to attempt and area by area approach that it take no longer than 2 years for the entire country.</p> <p>Otherwise it could be many any years before SSDAB is available and broadcasting in some parts of the country.</p> <p>If you factor in the time since the last CR rounds, and forecast that it could take at least 4 years to do a full country process, if you are a new CR station that launched the day after the last CR rounds closed, then your community could have ended up waiting? 10 years before you are broadcasting?</p>
<p><b>Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?</b></p>	<p>Yes, no issues. But I believe Ofcom should provide workshops and briefing materials to assist not for profit aspirational applicants in putting the best and most suitable applications in.</p>
<p><b>Question 6: Do you agree with our proposed approach for assessing the ability of applicants to establish their proposed small-scale radio multiplex service?</b></p>	<p>Yes, no issues.</p>
<p><b>Question 7: Should Ofcom require that the studio of a C-DSP licensee be located within</b></p>	<p>No. Not all community radio is community of location, some is community of interest. For</p>

<p><b>the coverage area of the small-scale radio multiplex service it plans to broadcast on? Please explain the reasons for your view.</b></p>	<p>example the RNIB radio might have a case to apply for a C-DSP license in different areas to serve blind communities of those areas. Same can be said for other communities of interest, that might run a national service but that serves targeted communities across the UK.</p> <p>However, I believe that where there is demand for reserved capacity for C-DSP, than priority should be given to those that are located with the coverage area.</p>
<p><b>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?</b></p>	<p>No I don't agree. The proportion should be able to flex, as more people are listening to digital radio as the years go on.</p> <p>If a SSDAB Mux is going for up to 12 years, and in say 10 years time RAJAR report that 75% of listening is via digital radio (and for ease of argument lets not drill further down), how would it be fair that CR licenses are still apportioning their income equally?</p> <p>Also you need to be able to account for those CR stations that might hold one analogue license in one area (which is the maximum), but they could hold a DSP license that operates across multiple SSDAB or even local DAB areas.</p>
<p><b>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?</b></p>	<p>Yes, no issues.</p>