

## 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, we agree with Ofcom's planning principles and methodologies to be used to refine the coverage area plan for small-scale DAB.</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>Yes, we generally agree with Ofcom's 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>DAB+ only operation makes sense in areas of high demand from service providers, such as in large urban areas. We believe that small-scale multiplex operators should have the choice of providing services as either DAB or DAB+ as they best see fit especially in more rural areas.</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>Yes, we broadly 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>Especially in urban areas where there is large demand from current and inspiring community broadcasters, we believe that priority should be given to multiplex applications that agree to guarantee the greatest C-DSP capacity.</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>Yes, we agree with the factors of which Ofcom proposes to take into account when deciding the order and timescale in which Ofcom will advertise small-scale radio multiplex licences.</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, we agree with Ofcom's proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications.</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?**

Yes, we agree in general, however, Ofcom should give particular positive weighting to applicants who already have demonstrable experience of delivering a community radio service in the locality proposed.

We believe an appropriate model is for the multiplex licence to be held by a syndicate of current community and small scale radio operators. Particularly in urban conurbations such as Greater Manchester with high demand from existing operators such a joint venture would be preferable to a single C-DSP operator, or a third party commercial company, holding the multiplex licence. Therefore particular attention should be given to the experience of the groups involved in the assessment of applications. This should also take into additional account the opportunities for co-locating with existing FM transmission services.

We note Ofcom's observations in this respect that the third criterion is considered desirable not essential. Notwithstanding that, while Ofcom may wish to set thresholds of technical viability (Criterion 1) and of viability (Criterion 2), provided such thresholds are met, award decisions should be based on scoring against all five criteria with equal weighting in order to reach a fair decision between competing applicants.

**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.**

We believe that the requirement that the studio of a C-DSP licensee is located within the coverage area of the small-scale radio multiplex service on which it plans to broadcast should be assessed on a case by case basis.

We believe this requirement should be enforced for operators defining their service as serving a "geographical community". Operators who define their service as a "community of interest" need not require a local studio if their key commitments include appropriate protections to ensure relevance to the broadcast area.

**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**

Yes, we generally agree with this approach to apportion income equally across analogue and digital licences as it will be easier to administer. We would welcome that there is flexibility to provide alternative programming on DAB and

**apportionment is reasonable. Do you agree with our suggested approach?**

analogue services as appropriate with this flat rate apportionment of income remaining in force.

This proposal does not take into account the higher costs of simulcasting on both analogue and digital. It is therefore recommended that Ofcom seeks a change to the fixed revenue allowance with DCMS to better support holders of both analogue community radio and DSP licences.

**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?**

Yes, we agree that prospective C-DSP service providers will only be able to apply for a C-DSP licence after Ofcom has invited applications for the small-scale radio multiplex licence upon which their proposed C-DSP service is intended to be broadcast.