

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>Yes, we agree with Ofcom's planning principles and methodologies</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, agree with the majority of Ofcom's proposed approach.</p> <p>However, we would ask that you allow operators the choice of either DAB or DAB+ rather than specify one particular platform, a rule that we understand has not been placed on other multiplex operators.</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, we agree.</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>Yes, we agree.</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>Yes, we agree.</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, in principle however Ofcom should give more weighting to applicants who directly or through linked companies have demonstrated the ability to deliver a community radio service in the approximate are proposed for the multiplex.</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</p>	<p>Yes, 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 is essential to ensure that</p>

<p>multiplex service it plans to broadcast on? Please explain the reasons for your view.</p>	<p>the community it plans to serve via the multiplex is connected to the operator and not a remote faceless brand. This may work in commercial radio where listeners are increasing loyal to the radio brands and care less about its localness, but in the case of community radio, being part of that community is essential in our opinion. Not having this rule could result in a network of “community” C-DSP licences, across many multiplexes, and a regional/national community radio service does not seem appropriate for the principles on which community radio was founded.</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, we generally agree with this approach to apportion income equally across analogue and digital licences as it will be easier to administer and there is provision for exceptions to be made if differential apportionment is required. However, 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.</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>We agree that a prospective C-DSP provider can only apply for a licence when the appropriate multiplex has been advertised, but should not be restricted to those that have aligned themselves to one multiplex applicant. A service provider may wish for contractual and or commercial reasons at that stage not wish to commit to one particular applicant where there are multiple applicants for the same multiplex service, this should not prevent them from applying for a C-DSP.</p>