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?	**<u>Preface</u>: We think that several of these questions require skills which the majority of those running Community Radio Stations are unlikely to have.** Answer: We think that technically the plan offered is the only feasible one
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?	We think that the 40% rule is too inflexible. This would be especially onerous where small scale multiplexes overlap with larger multiplexes. In particular we feel that ahead of provision of service, that items 3.23 – 3.24 and 3.25 need to be revisited and if possible greater clarity achieved. We also believe that item 3.21 is in need of clarification, especially to give some indication of what the planning tool might be and how it might be operated
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?	Whilst we agree in principle with the reservation of 'Guaranteed channels' we also have concerns about the numbers when applied to large urban conurbations and feel that greater flexibility might be appropriate in certain areas.
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?	We believe that these factors are feasible and appropriate. We particularly endorse the provisions noted in 4.3. We would welcome further clarification of 4.11 especially where it pertains to licences held by existing Community Radio Stations and the interface with their existing FM licence periods. It seems appropriate as a CR station in the third period of licence holding that there is further clarification of this issue –the more so as the implications of CDSP means further capital investment by the station
Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex	See preface in answer 1. We do not feel qualified to comment on this question

licence applications?	
Question 6: Do you agree with our proposed approach for assessing the ability of applicants to establish their proposed small-scale radio multiplex service?	Whilst we agree in principle with the ideas put forward our reservations are about thelong term viability of what is being proposed. From the point of view of being a potential broadcaster on a small scale multiplex we would wish to seek reassurances about the long term ability of the chosen provider to sustain the service through the entire licence period. Given the capital expenditure that will be required from both the provider and the potential CR broadcasters this would be an important factor in any decisions made about choice of future broadcasting platforms.
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.	For CR stations like Phonic this raises several issues. At present, because of the proximity of a small Commercial Station there are restrictions on the amount of revenue that we can raise. Our output is mainly aimed audiences within Exeter area, but the current proposals seem to suggest that we could apply for a licence in an adjacent area and be freed from the current financial restrictions. This, therefore, has a bearing on our response to Question 8. We would wish to have further clarity about the situation for the small number of stations that fall within this category. We intend to continue to broadcast from our current studios which are located within ourcurrentbroadcast area. As with many other CR stations the reasons for our views are those of financial viability.
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?	See also our response to question 7 above. Any moves to become involved in C-DSP are not cost neutral. This approach is, for us, contentious since it seems to imply that we would be forced to accept an increase in base revenue expenditure without the ability to raise a proportionate amount of income, which would affect our viability as a business. Clarification of these issues are important for CR stations like Phonic.
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	This seems a logical process. Our concerns mainly revolve around 6.45 and 7.1. We are concerned about the duration of CDSP licences especially given the (as yet) unresolved issues

radio multiplex licence upon which their proposed C-DSP service is intended to be provided?	of Community radio licencing. (See also our response to question 4). It also appears possible under the proposed arrangements that it would be possible to hold a licence without providing a service. We would wish to see a stricter regulatory process than that which is outlined. In 7.1 we would wish to see a stronger regulatory framework around the concept of 'social gain' and the ways in which this regulation is applied and monitored.