

## 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 proposed approach.</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, in general.</p> <p>However we believe that small-scale multiplex operators should have the choice of providing services as either DAB or DAB+ format.</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.</p> <p>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 Ofcom's proposed approach.</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.</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, we agree in general.</p> <p>We feel that, especially in high demand urban conurbations such as Greater Manchester, the best model is that the multiplex licence is held by a consortium of current small scale and community broadcasters. Therefore Ofcom should give significant attention to the past experience of the applicant group.</p>
<p><b>Question 7: Should Ofcom require that the studio of a C-DSP licensee be located within the coverage area of the small-scale radio</b></p>	<p>We think this requirement should be enforced for operators defining their service as serving a "geographical community". "Community of</p>

<p><b>multiplex service it plans to broadcast on? Please explain the reasons for your view.</b></p>	<p>interest” services should require key commitments with appropriate protections to ensure relevance to the broadcast area.</p> <p>Many hospital and student broadcasters make use of syndicated programmes, so while we think that a local studio is essential to ensure a local connection we feel a flexible approach towards locally produced hours is needed to allow such very small broadcasters to take advantage of digital broadcasts.</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>On the whole we agree this is a sensible approach.</p> <p>We would also highlight the case of hospital and student radio stations operating on a non-profit basis that currently broadcast via long term RSL broadcast licences and do not hold community radio licences. Should such a non-profit broadcaster choose to simulcast a L-RSL service with C-DSP service, we believe that an equal apportionment of income between the digital and analogue service should be allowed.</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, we agree with Ofcom's proposed approach.</p>