

## 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 your principles and methodologies.</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 agree with the approach including proposed amendments to the Code.</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>We agree with approach to setting the level of reserved capacity for C-DSP services although we would welcome OFCOM having a reserve power to intervene in the event of disputes over pricing for C-DSP licensees. We are also unclear of position if OFCOM has issued more than 3 C-DSP licenses in a particular area - it seems to us that the MUX operator should be obliged to offer same capacity and terms to the fourth and further C-DSP holders too.</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>We feel it is important to roll out the SSDAB MUX licenses as soon as practically possible accepting the bottlenecks in OFCOM for technical and admin staff will limit your ability to do this. We hope you will advertise the areas where the most interest has been indicated first along with the pilot areas. We hope all areas can be advertised within 3 to 4 years starting in early 2020.</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.</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</p>
<p><b>Question 7: Should Ofcom require that the</b></p>	<p>Yes, we think that any Community Radio service</p>

<p><b>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.</b></p>	<p>should have its studio within its local community. Otherwise it is very difficult to provide the necessary open door to members of the local community which to us defines Community Radio.</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>This issue seems to us to be over-complicated and probably unnecessary to deal with in most cases. We think that almost all Community Radio services going onto DAB+ will be simulcasts of the existing FM or AM services so revenue will be earned by that service regardless of platform. Few CR stations will have ability to split services and even fewer to determine who is listening on which platform. We would prefer a simple solution such as raising the threshold for advertising income from £15K to say £25 K where the existing service is simulcast on DAB+</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, this seems sensible as the licence has no purpose before the MUX is up and running. However we do question the logic of C-DSP licenses for areas where one of the existing CR stations becomes the MUX Operator. In such cases (which we hope will be widespread) the Operator can award themselves carriage with a DSP licence which then also allows them carriage on any other MUX which a C-DSP licence does not. Their inability to apply for an OFCOM CRF grant for their DAB+ service does not preclude them applying for their FM or AM service which is most likely to be simulcast on DAB+. It seems to us that the C-DSP licence is only really beneficial to an existing or new CR service operator who is not the local SSDAB MUX operator to guarantee them carriage on DAB+</p>