

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 to be used to refine the coverage area plan for small-scale DAB.</p> <p>However, we are concerned that current planning does appear to not include the area we cover of Stafford and Stone areas in mid Staffordshire, despite us submitting an expression of interest.</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, 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. However, small-scale multiplex operators should have the choice of providing services on either DAB or DAB+ as they best see fit and not be held to a higher regulatory burden than other DAB 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 with Ofcom's proposed approach to setting the level of reserved capacity for C-DSP services on small-scale radio multiplex services.</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 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>

Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?

Yes, we agree with Ofcom's proposed approach for assessing the technical plans submitted in small-scale radio multiplex 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?

Yes, we agree in general – however an existing broadcaster requesting a multiplex should be automatically given first refusal if there is only one existing licence holder serving a geographical area, and the licence be put out to tender if there's more than one.

Positive weighting should also be given to applicants whose participants include persons or organisations who already have demonstrable experience of delivering a community radio service in the locality proposed.

This indicates real-world experience of implementing or commissioning transmission services and of negotiating site access arrangements with relevant local site owners. This criterion should also take into additional account the opportunities for co-locating with existing FM services.

In making an award decision Ofcom must also balance responses on this criterion and the technical plan (Criterion 1) with responses to the 3 other criteria listed. In particular, the third criterion (ownership or participation in the applicant by a potential or actual C-DSP licensee) should carry equal weighting in an award decision alongside each of the other criteria.

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.

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 may cause issues for some stations who are not necessarily defined geographically or whose broadcast area does not match that of the proposed

	<p>multiplex. Ofcom should allow for exceptions to this rule where justification can be provided.</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>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. It will be in the interests of potential C-DSP services to not have to apply and pay licence fees before the licence for the multiplex on which they may wish to broadcast has even been advertised or even launched.</p>