

Viamux Ltd. is a provider of small-scale DAB solutions which began as a research & development offshoot of Niocast, the small-scale DAB trial licensee for Manchester. The company was formed to supply and install equipment for a collaborative DAB trial between the Irish state broadcaster, RTÉ, the Independent Broadcasters of Ireland and Irish Radioplayer. Installed at RTÉ's Radio Centre in Donnybrook during July 2017, the system employed two DAB+ multiplexes which carried the majority of Ireland's 36 commercial radio stations along with RTÉ's nine services. The trial was a test of concept for the 'Hybrid Radio' system which switched listeners seamlessly between the Irish Radioplayer app and free-to-air DAB+.

Viamux later ran its own small-scale DAB trial in Cork, Ireland's second city, between August 2018 and July 2019. Whilst successful from a technical point of view, the trial highlighted regulatory shortcomings which are likely to impede wider DAB take-up across Ireland in the short term.

Viamux Ltd. is also a founding member of Asociación Española de Emisoras Digitales (the Spanish Association of Digital Radio Stations) which aims to facilitate the implementation and development of digital Radio in Spain, in all its formats.

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?

Viamux welcomes Ofcom's decision to allocate spectrum for the provision of small-scale radio multiplex services.

We broadly agree with the planning principles set forward by Ofcom. It is clear that considerable work has gone into the spectrum planning for the roll out of small-scale DAB. It was always going to be a challenge to create polygons which satisfy both the constraints of frequency planners and the ambitions of licensees. With this in mind, we would hope that Ofcom will apply some latitude in assessing applications Viamux believes that, in its conversations with ADTI, they would negotiate use of the planning tool was made available and affordable to those organisations applying for a small-scale DAB licence.

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?

Viamux believes that it is important that Ofcom ensures that small-scale radio multiplex services can accommodate as many programme services as reasonably possible by design. We therefore support the amendment of the Digital Radio Technical Code to include a condition requiring that small-scale radio multiplex services should operate using DAB+ only.

Viamux fully supports Ofcom's reasoning (both commercial and technical) to continue requiring that vertical polarisation (only) is used.

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?

The new legislation requires Ofcom to ensure that capacity is reserved on small-scale DAB multiplexes for a minimum of three C-DSP licence holders.

We agree that the amount of capacity that must be reserved by the small-scale radio multiplex licensee should be calculated on the basis that each C-DSP service must be entitled to broadcast at a minimum of 48 kbit/s (36 capacity units). However, we feel that the reserved space should be expressed in terms of capacity units which would allow for more C-DSP licensees to be accommodated, if they choose lower bit rates.

The new legislation will impose a statutory requirement for small-scale radio multiplex licensees to provide Ofcom with details of the carriage fees that they are currently charging existing programme service providers on the multiplex ('rate card'). However, we believe there is no compelling reason why the rate card should be published. Viamux believes this should be left to individual licensees.

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?

In determining the order in which Ofcom will advertise small-scale radio multiplex licences, we believe they should be prioritised as follows;

1. Trial multiplex areas;
2. Areas with full local radio multiplex services;
3. Areas with a large population size;
4. Areas where the level of likely demand from service providers is high;

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

Viamux agrees with Ofcom's proposal to apply the following criteria in assessing proposals:

- Extent of proposed coverage;
- Compatibility with the overall spectrum plan;
- Degree of overlap with local radio multiplex services.

We fully endorse Ofcom's stated preference for applicants that propose to cover a larger proportion of the population covered by the advertised polygon.

Question 6: Do you agree with our proposed approach for assessing the ability of applicants to establish their proposed small-scale radio multiplex service?

Viamux agrees with Ofcom's proposed approach for assessing applications by focusing on three main areas:

1. Financial viability and long-term sustainability;
2. Expertise and experience of the applicant's technical staff or contractors;
3. Technical expertise (in-house or external)

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?

We understand and support Ofcom's intention to ensure that a C-DSP licensee should have a '*presence*' within the coverage area of the relevant small-scale radio multiplex service.

Viamux agrees that where a licensee holds both a C-DSP and analogue community radio licence, the single "fixed revenue allowance" of £15,000 should apply across both the services.

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?

Viamux welcomes Ofcom's proposal to invite prospective C-DSP licensees to apply for a C-DSP licence once they have invited applications for the relevant small-scale radio multiplex licence but only entertain applications where an 'in principle' offer of carriage has been made by a prospective small-scale multiplex licensee.