

## 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</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</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</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>Advertised areas should be a mix of large and small from the outset. Ofcom should consider earlier advertising polygons in areas where there is a lack of FM frequencies, and where previous community applicants have been turned down, purely due to lack of an FM frequency.</p> <p>West Kent Community Radio (Tonbridge / Tunbridge Wells) has an application in for the current FM round. We do not know whether an FM frequency is available, although we believe there are suitable ones. To be turned down due to a lack of an FM frequency, only wait a long time for an SSDAB opportunity, and to see only large population areas ahead in the queue, is not something we believe is correct.</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 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>With a modification or clarification.</p> <p>For the reserved slots, the C-DSP service studio should be in the coverage area of the local SSDAB mux, agreed.</p> <p>However, the same C-DSP licence holder should be able broadcast on other neighbouring or distant SSDAB mux carriers, which is indicated in the consultation, without the need for a studio in those locations. That isn't clear in the consultation.</p> <p>However, C-DSP licence holder broadcasting on a distant mux, should not be entitled to a reserve slot.</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>We disagree with this proposal.</p> <p>An existing FM/AM community radio embarking on providing their service on an SSDAB multiplex, will do so at extra cost. Those costs include the SSDAB carriage, additional Ofcom and PRS/PPL licence fees, and other related costs, all from existing budgets.</p> <p>We do not believe that the restriction of both service coming from a single £15,000 limit is correct. The £15,000 limit should be increased to reflect the additional costs associated with a station operating on both FM/AM and on SSDAB.</p> <p>Our suggestion would be an additional allocation of £5,000 (to a total of £20,000) for a community station using both FM/AM <b>AND</b> SSDAB for the same service.</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</p>