Your response

Question	Your response
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?	The coverage area we presently cover on FM does not match the proposed Wetherby/Harrogate polygon. We feel the investment needed to satisfy this coverage may prevent us setting up our own mux or even participating in one. The shape suggests 2 sites in a SFN with added complication and cost which for a rural area may not be economically viable. We would prefer a single site concentrating on our current area without Harrogate.
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?	The critical mask is probably overkill for <100watts ERP as spurious responses will be beyond measurement. Vertical polarisation is no issue. The enforcing of DAB+ should be more aspirational and MP2 allowed for the first 2 years of the licence period. If possible, a station should be allowed to operate parallel MP2 and DAB+ streams on the multiplex particularly if that mux is owned by a sister company to allow listeners to upgrade equipment.
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?	Three should be considered a minimum and increased if the population is there to be served.
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?	Agreed.
Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?	If no applicant for an SSDAB mux licence appears because of area non-sustainability of the polygon, an application for a reduced area should be allowed.
Question 6: Do you agree with our proposed approach for assessing the ability of applicants to establish their proposed small-scale radio multiplex service?	Agreed.
Question 7: Should Ofcom require that the studio of a C-DSP licensee be located within	The primary C-DSP licencee's studios of the mux coverage area should be located in the

the coverage area of the small-scale radio multiplex service it plans to broadcast on? Please explain the reasons for your view.	coverage area surely so that monitoring and quality control is possible. Out-of-area C-DSP licencees should only be admitted on an exchange carriage basis or where viability is vulnerable.
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?	I don't see the logic in the DAB and FM services being different. I would have thought being identical would be a condition. Since there are extra costs in running the DAB service, I think the restriction of £15k before the 50/50 apportionment of advertising and other revenue sources is likely to colour the judgement of whether to participate in the SSDAB project. A 50% allowance to £22.5k before the 50/50 apportionment seems fair to me to allow for the extra costs of the C-DSP service.
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?	Agreed.