

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>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, but 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>No because the proposals do not guarantee carriage for the local analogue community radio service. The capacity reserved for C-DSP could be taken up by other C-DSP licence holders thereby potentially excluding the local community service which has provided a valuable community radio service for many years. We feel Ofcom should find a way within the legislation to guarantee this such as designating an appropriate number of the C-DSP or DSP capacity be reserved for existing analogue Community Radio Stations in the area.</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. Generally 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. However, we would also suggest that areas neighbouring existing trial areas should be prioritised as there is an expectation in these neighbouring areas as to an early introduction of SSDAB in their area.</p>
<p>Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex</p>	<p>Yes, we agree with Ofcom's proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications.</p>

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, Ofcom should give particular positive weighting 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.

We also believe that Ofcom should take extra consideration where application consist of a joint or collaborative/cooperative application between existing community radio stations or community/local commercial stations who have proven their ability to operate licensed services both in terms of the technical and content requirements of their respective licenses. Such Community/Commercial FM colaborations are likely to have broad support of local control of a Mux serving the local area.

We also believe that Ofcom must introduce a maximum fee that Mux perators can apply to

	<p>Community Radio stations and that this fee should not exceed the current cost of FM (ie £600 per year for the Broadcasting Act Licence).</p>
<p>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.</p>	<p>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 multiplex. Ofcom should allow for exceptions to this rule where justification can be provided. It may also cause issues for Community Radio stations which wish to be on the Mux in their immediate area while also wanting to be on neighbouring Muxes to better serve their community.</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. By this we think the exemption should be doubled to £30,000 for those who are on both analogue and SSDAB.</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. C-DSP licence holders must be subject to the same obligations as FM community radio stations in terms of Local/Original Hours and Music, Speech & Social gain otherwise Ofcom will create a 2 tier C-DSP licence holder.</p>