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Peter Davies
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Ofcom
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Dear Peter

Thank you for your presentation in Manchester last Friday which was very informative.

In response to your current consultation regarding licencing policy for VHF Band III, Sub-band 3, I would, on behalf of Forward Media Limited, like to make the following comments.

We operate Lite FM in Peterborough and Connect FM in Kettering. To date there doesn't appear to be an affordable option available for us to be able to offer our listeners a digital transmission. We are very keen to find a digital solution for our stations.

You talked about alternative platforms to DAB, namely DVBH, DMB and DRM. We feel that these possibilities are so much in their infancy and unproven at the time of this consultation that stations of our size can't yet develop a strategy to ensure that we can find a reasonably-priced digital home for the future.

Consequently it's impossible to say, at this early stage, that the current proposals represent the optimal use of the spectrum available as we can't yet see what alternatives to DAB will materialise and the possible impact the proposals might have on the ability to deliver DVBH, DMB, DRM or, indeed any other platform.

We feel that CRCA offers helpful input to this debate and understand that you have agreed with them that no doors will be closed to us (smaller stations) through this consultation and that analogue (FM) will be left alone, possibly, ad infinitum. We would welcome confirmation of this.

Regarding DAB, we believe that its take up is beginning to gather real pace now and would like you to consider whether it might be feasible to utilise its capacity differently in order to accommodate many, if not all, of the 90 as yet digitally "homeless" local stations by "cutting the cake" on a much more local level and effectively offering smaller slugs of capacity more economically than is currently the case.

Given the accepted uncertainty of the future method of digital radio delivery and the corresponding remaining questions over suitable receivers and their adoption by listeners, we feel that it would make sense to take as much time as is necessary in order that the best route forward for broadcasters, listeners and manufacturers can be ascertained.

Yours sincerely

Dave Myatt
Managing Director
Forward Media Limited

