

CBC response to Ofcom plan for extending local DAB coverage



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The Christian Broadcasting Council of the United Kingdom (CBC) wishes to give our views regarding Ofcom's invitation to comment on its Local DAB Expansion Plans published on 28 January 2015. We give our answers to the questions posed which we have answered, but have edited for convenience and space, plus some additional comments.

General Comments

While **CBC sees the need for some rationalisation of coverage for local DAB multiplexes**, mainly due to cost grounds, we would point out that many of the local multiplexes are based around the coverage area of city-based 'heritage' ILR services and/or BBC local radio services. **However this pattern of local multiplexes ignores the coverage areas of some commercial radio services that were put in place initially because those areas covered the towns and surrounding areas to which the local population related.** In some cases these local FM services are in areas that border or even cross more than one of Ofcom's own 'approved areas'. It also appears that some local multiplexes were therefore designed just to fill-in the space between other city-based multiplexes or just blindly follow an existing unitary or administrative county boundary which themselves do not relate to real counties such as Yorkshire and its traditional three Ridings which have a combined population greater than that of Scotland.

CBC notes that DAB is excellent for increasing listener choice of national stations and for those radio groups who network their programme output to their local radio transmitters across the whole of the UK or just to the major population centres such as Birmingham, Bristol, Glasgow and Manchester.

Q1. Do you think that any of the proposed changes to frequencies and/or licensed areas would unacceptably narrow the range of programme services which would be available in the relevant local multiplex area?

Firstly we agree with the frequency changes proposed for all the muxes listed in 2.10.

Secondly **we agree with all the changes to the Local DAB multiplexes** listed in 2.12, including Cornwall, **apart from the North Yorkshire Mux**. In this case we suggest:

- a. The reincorporation of the Bridlington/Driffild area back into the North Yorkshire Mux or that a new Minimux is used to transmit to that area;
- b. The need for a Minimux to cover Whitby and carry at least *Yorkshire Coast Radio Extra*;
- c. The need for two Minimuxes installed to cover parts the Wharfe Valley and Skipton to carry *Stray Extra*;
- d. In addition these Minimuxes, within the overall North Yorkshire Mux area, would provide an opportunity for the carriage of some Digital 2 programme services to those areas as it is highly probable that with only 42 or 45 transmitters neither bid – Listen2Digital or Sound Digital – will reach all the populations of both the East Riding and North Yorkshire including the towns of Bridlington, Harrogate, Ilkley, Otley and Skipton.

Notes:

- In the case of *Yorkshire Coast Radio*, which broadcasts to Bridlington, Filey, Scarborough and Whitby on FM, it would mean that in order to cover this entire patch that the station would have to be broadcast on the **Humberside, North Yorkshire and Teesside Muxes**: this makes the use of DAB for this service uneconomic in its current form. A side effect of the current DAB coverage of the ‘fill-in’ **North Yorkshire Mux** is that *Yorkshire Coast Radio/Yorkshire Coast Radio Extra* can be heard in Harrogate and York but not by their listeners in Whitby and Bridlington.
- All the three **Bradford & Huddersfield, Leeds and North Yorkshire Mux** proposals in this Ofcom consultation would appear to mean that if people wish to listen to *Stray FM/Stray Extra* on DAB in the future that this local station would have to be carried on these three muxes in order to cover Skipton, the Wharfe towns of Otley and Ilkley as well as Harrogate, Knaresborough, Ripon and Wetherby: this certainly makes local DAB for such stations uneconomical and would consign their listeners to having to give-up listening if only DAB was available sometime in the future. **It is essential that ‘low-cost minimuxes’ be used to augment some of the main local muxes in the longer term in order to extend listener choice to local radio services and not reduce choice.**

Q2. Do you agree with the proposed changes set out in the applications would help promote the development of local digital sound broadcasting?

On the whole we agree that as currently proposed, apart from the areas mentioned in our response to Q1, as the extra choice of services will help promote local DAB **but must not exclude existing local services**.

Q3. Do you agree that the licensees’ proposed coverage plans?

Yes for the areas based on city-based multiplexes that have satisfactory coverage areas but not for some local multiplexes that were designed just to fill-in the space between other city-based multiplexes or just blindly follow an existing unitary or administrative county boundary. This therefore this means that for some broadcasters that local DAB is currently not fit for purpose for many local radio services especially in the fill-in multiplexes.

Q4. Do you consider that the licensees have the ability to maintain their local radio multiplex services?

These current local DAB multiplex areas have been designed to be able to attract enough services, including networked music services from outside the local area, to make their operation viable. This therefore means that some local operators will not be able to afford the DAB carriage fees and therefore it is essential that local FM is kept for these operators.

Q5. Do you consider that there are sufficient safeguards in place to protect stations carried and other Mux operators?

Following the debacle over the carriage contract renewal of Premier Christian Radio on D1 CBC feels that such an action by the multiplex operator to decide to not renew a transmission contract, on reasonable terms to an existing programme provider, brings into question the wisdom of having an infrastructure company providing the transmission facilities also solely holding a digital multiplex licence and deciding which programme services are on its multiplex (and acting as a “gate-keeper”).

In the long term CBC wonders if this is the best way to organise the licensing of DAB multiplexes, whether local or national muxes, to ensure that a wide variety of programme services are provided. This is a matter that we feel that Government needs to re-consider in the light of what may have happened to an existing programme provider without the intervention of Parliament and that safeguards need to be strengthened to allow Ofcom power to intervene in similar circumstances. In this case, without intervention by MPs, there could have been the possible replacement of a majority speech radio station by another variant of an existing pop music format which would have reduced listener choice.

Q6. Do you agree with Ofcom’s proposed additional policy criterion?

Firstly we believe that it may be necessary in some population centres such as Manchester and Birmingham where existing local DAB capacity is near-full or full for Ofcom to consider advertising a second local mux to enable more services to be carried as is the case in London with its three local muxes and the Scottish central belt with two local muxes – Edinburgh and Glasgow – and the Central Scotland regional mux. Once that situation has been rectified in those areas then there may be a case for such an addition to the policy criterion as suggested in paragraph 2.29.

Q7. Do you consider that there are other grounds to approve or not approve any licence variation requests?

CBC believes that where a networked service, that originates more than 20% of its output from outside the ‘approved area’, and aims to out-bid a wholly locally-based station for space on the local multiplex then the licence variation in favour of a non-locally based station should not be approved.

Finally we note that Local DAB is currently not always fit for purpose for many local radio services, including community radio stations. The examples of *Yorkshire Coast Radio* and *Stray FM* are just two examples of how the proposed changes and the existing coverage areas are not fit for many

listeners to local radio (see Q1). Other parts of the country where this is applicable include The Fens, North Devon, the Peak District of Derbyshire and the Lake District where local DAB does not fit local radio, which is still based in its community, and therefore some local stations will not find that these existing or slightly modified local muxes are suitable for their modus operandi.

Therefore **CBC will continue to support the retention of FM for local radio services only, (including community radio)** and will support the reallocation of the national FM frequencies, currently used by the BBC's four national services and by Classic FM, to local radio services when analogue national broadcasting is finished/switched-off.

We will continue to support a mixed economy of free-to-air Local DAB (including Minimuxes), National DAB, and Local FM (including community radio).

We hope that our comments are of help to Ofcom in their decision.

Yours truly,

J Peter Wilson
Consultant to CBC on Broadcasting Regulation

Mrs Olave Snelling
Chairman of the CBC Executive Council

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The Christian Broadcasting Council, known as CBC, was founded in 1983:

- ✓ *To stimulate and promote the knowledge of the Christian faith and the propagation of the Gospel of Jesus Christ through the broadcasting media in the United Kingdom.*
- ✓ *To encourage the highest standards of Christian media communication.*
- ✓ *To support and develop the knowledge and standards of all those involved in broadcasting.*
- ✓ *To bring together in fellowship those working in broadcasting and those who support the vision of CBC, under girding and encouraging them in their spiritual lives.*