Small-scale radio multiplex licence

Application form – Part A (public)

Name of applicant (i.e. the body corporate that will hold the licence):

Bradford Multiplex Broadcasting Corporation Limited.

Multiplex licence area being applied for (note this must be a small-scale multiplex area <u>currently</u> <u>being advertised</u> by Ofcom):

Bradford

Public contact details:

West Riding House Suite 23, 8th Floor, 41, Cheapside, Bradford, West Yorkshire, United Kingdom, BD1 4HR

Publication date: 1 September 2020

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1. Overview

You should complete this form if you are applying for a small-scale radio multiplex licence. You can find further information about small-scale radio multiplex services in the <u>Guidance notes for</u> applicants and licensees.

This application form is divided into two parts – Part A (which we will publish on our website) and Part B (which will be kept confidential). This document constitutes Part A; Part B of the application form is available on our website.

If you encounter any issues using these forms, please contact broadcast.licensing@ofcom.org.uk.

The purpose of this form

- 1.1 You should complete this form if you are applying for a licence to provide a small-scale radio multiplex service (a 'small-scale radio multiplex licence'). A small-scale radio multiplex service is the means by which DAB digital radio stations ('digital sound programme services') are broadcast, and can transmit around ten stereo digital sound programme services (or a significantly higher number if the DAB+ standard is utilised). The application form is divided into two parts Part A (which we will publish on our website) and Part B (which will be kept confidential). This document constitutes Part A; Part B of the application form is available on our website.
- 1.2 Small-scale radio multiplex licences are awarded by Ofcom in a competitive process.

 Applications are judged against specified criteria, and Ofcom awards the licence to the applicant which it considers best meets the criteria.
- 1.3 You can find more information about small-scale radio multiplex licences in Ofcom's published <u>guidance notes</u> for licence applicants and licensees. This document also includes detailed instructions on how to complete the application form, and information on the next steps in the application process. Please read this guidance and the 'frequently asked questions' carefully before completing both parts of the application form.

Provision of information

- 1.4 Ofcom requires complete and accurate information to assess applications. In particular, we must be satisfied that those applying for a licence are 'fit and proper' to hold a licence and are not disqualified from participation in a licence.
- 1.5 It is an offence under the Broadcasting Act 1996 (as amended) to provide false information or withhold relevant information during the application process, and may be grounds for revocation of a licence subsequently granted.

Publication of applications

- 1.6 Part A of the application form (i.e. this document) will be published by Ofcom on our website as soon as practicable following the closing-date for applications. Part B of the application form will remain confidential. Non-confidential responses to any clarification or amplifications will also be published on the Ofcom website, alongside the Part A application form. Ofcom may take into account any comments received from the public, which can be made to it with respect to Part A of the application submitted.
- 1.7 In submitting Part A of the application, you agree that Ofcom may publish contact details for the licensee (as required on the cover of this application form), which may include personal data, on the Ofcom website and/or in other relevant publications. If you have any questions about the information we publish, or there are any changes to this information, you should contact the Broadcast Licensing team by email (broadcast.licensing@ofcom.org.uk).
- 1.8 Ofcom considers issued small-scale radio multiplex licences to be public documents and copies of licences will be made available to third parties on request, noting that personal data apart from the name of the licensee may be redacted.

Data protection

1.9 We require the information requested in this form in order to carry out our licensing duties under the Broadcasting Act 1990, Broadcasting Act 1996 and Communications Act 2003. Please see Ofcom's General Privacy Statement for further information about how Ofcom handles your personal information and your corresponding rights.

Keeping up to date with broadcasting matters

- 1.10 We strongly recommend that you sign up to receive Ofcom's regular email updates on broadcasting matters including notification when the Broadcast Bulletin is published.
- 1.11 Ofcom publishes a monthly radio licensing update which lists new services licensed, licences revoked, licence transfers, and changes to licensed services during the past month.
- 1.12 To sign up to receive these communications, please visit https://www.ofcom.org.uk/about-ofcom/latest/email-updates and select 'Broadcasting'.

2. Extent of proposed coverage area

About this section

Under section 51(2)(a) of the 1996 Act, we are required to consider the extent of the coverage area an applicant proposes to achieve within the area which has been advertised. This section therefore asks you to describe the coverage you are proposing to achieve. Further questions on the detailed technical arrangements for the proposed service, including questions on the transmission site(s) that you intend to use and your plans for how the multiplexing and distribution of your service will be arranged are contained in Part B of the application form.

Before completing this section of the form, you should read carefully the notes on 'Extent of proposed coverage area' in Section 4 of Ofcom's <u>guidance notes for licence applicants</u> and licensees.

2.1 Provide a summary, fully consistent with the more detailed information about transmission sites supplied separately in Part B, of the coverage area proposed to be achieved by your technical plan. This should include a description of the target area you are seeking to serve within the advertised licence area, and also any areas you are aiming to serve outside the advertised licence area for this small-scale radio multiplex service. (You may refer to your coverage prediction in the response you provide):

We propose three sites on an SFN to cover: Bradford City, Idle, Shipley, Saltaire, Baildon areas, which gives comprehensive coverage of the main population within the OFCOM defined polygon.

Our main TX site at Idle has an antenna pattern to protect proposed co-channel SSDAB services in Scunthorpe and Ripon. We have two low powered infill transmitters to enhance coverage in areas not adequately covered by Idle.

Our "overspill" coverage into populated areas outside of the prescribed OFCOM polygon will be minimal.

Our 38dB co-channel overspill is also minimised though it should be noted there are some remote "hotspots" on very high and uninhabited peaks due to the very hilly nature of the local geography.

Please note that practical site surveys, research and on site negotiations have been severely hampered by local tier 3 and corona virus lockdown during the application process.

2.2 Please provide a coverage prediction map for the whole transmitter network you are proposing to build within 18 months if you are awarded a licence. The map should show

the 63 dB μ V/m field strength and the advertised small-scale DAB licence area contour. Small-scale DAB licence areas in GIS format are available on the Ofcom website.

2.3 Please provide the following details of the prediction software used for your coverage assessments:

Provide the name and version of the prediction tool used.	RadioMobile 11.6.6
Detail the terrain model used by the software and its resolution.	SRTM 1/3 - 1 Arc seconds
Detail the ground cover (clutter) data used by the software and its resolution.	Globcover 300m
What propagation algorithm has been used?	Irregular Terrain Model (ITM) a variant of Longley-Rice
Where multiple sites are proposed, describe what methodology has been used to assess the network (SFN) gain	Composite summation
If these predictions have not used Ofcom-provided population data, state what population data has been used and its source.	OFCOM figures, as per OFCOM SSDAB website
Have your predictions been generated by a commercial organisation? If so, by whom?	Associated Broadcast Consultants

3. Ability to establish the proposed service

About this section

In Section 3, we are asking questions about the applicant company, its financial and business plan, the relevant expertise and experience of those who will be involved in providing the small-scale radio multiplex service, and the timetable for coverage roll-out. The answers to these questions will enable Ofcom to assess the application under section 51(2)(c) of the 1996 Act. Additional information will be submitted in Part B.

In the first part of this section we are asking for details of the applicant's officers (directors or, in the case of LLPs, designated members), its shareholders and participants. Where applicable, we are also asking for details of the officers of the applicant's parent and associated companies or LLPs etc.

If any of the individuals named in your responses are known by more than one name/version of their name, all names must be provided.

Certain persons are disqualified from holding a small-scale radio multiplex licence. This section asks the questions which enable us to consider this for those types of disqualification which apply specifically to bodies corporate. It also asks questions which are relevant to our assessment of the applicant's fitness and properness to hold a small-scale radio multiplex licence.

The response boxes and tables should be expanded or repeated where necessary, or provided in a separate annex.

'Officerships' in this section refers to: directorships of bodies corporate, designated memberships of LLPs, or membership of a governing body of an unincorporated association (including partnerships).

The remaining questions in Section 3 relate to the applicant's financial and business plan, the expertise and experience of those involved, and the planned timetable for launching the proposed multiplex service.

Applicant's details

3.1 Name of applicant (i.e. the body corporate that will hold the licence):

Bradford Multiplex Broadcasting Corporation Limited.

3.2 Company registration number stated on Companies House (if applicable):

12984959

3.3 For UK registered companies, the address of the applicant's registered office stated on Companies House. For non-UK registered companies, the principal office address:

West Riding House Suite 23, 8th Floor, 41, Cheapside, Bradford, West Yorkshire, United Kingdom, BD1 4HR

3.4 If a UK registered company, is the **current** Memorandum and Articles of Association document available on the Companies House website?

Yes/No (delete as appropriate)

If no, please submit the up to date document and indicate you have done so in the checklist in Section 7 of Part B.

3.5 Contact details of the individual duly authorised by the applicant for the purposes of making this application. This individual should be the company secretary or a director.

Full name	Syed Sibt UI Hassan SHIRAZI
Job title	Director
Address	West Riding House Suite 23, 8th Floor, 41, Cheapside, Bradford, West Yorkshire, United Kingdom, BD1 4HR
Telephone	01274306677
Mobile phone	07891219275
Email	syedhassan@live.co.uk

Ownership and control of company which will hold the licence

Details of officers, participants and shareholders of the applicant

3.6 Please provide the following details for each director or designated member of the applicant:

Full name of individual	Correspondence address ¹	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Syed Sibt UI Hassan SHIRAZI	West Riding House Suite 23, 8th Floor, 41,Cheapside, Bradford, West Yorkshire, United Kingdom, BD1 4HR	United Kingdom	Director of Bradford Asian Radio	N/A

¹ This should be the same address as is held and published by Companies House.

Nirmal	West Riding	United	Sekhon Group of	N/A
SINGH	House Suite 23,	kingdom	companies	
	8th Floor,			
	41,Cheapside,			
	Bradford, West			
	Yorkshire, United			
	Kingdom, BD1			
	4HR			
Kamal	West Riding	United	Keighley Cricket	N/A
Sarwar	House Suite 23,	kingdom	Academy	
	8th Floor,			
	41,Cheapside,			
	Bradford, West			
	Yorkshire, United			
	Kingdom, BD1			
	4HR			

3.7	Please identify any entities with which the applicant is affiliated:
	(If this question is not applicable to the applicant please respond "N/A" in the table.)

Full name of the entity	Address
N/A	N/A

3.8 Complete the following table, expanding it if necessary, to list all bodies corporate which are controlled by the applicant, and their affiliates:

Full name of entity	Address	Affiliates
N/A	N/A	

3.9 Complete the following table, expanding it if necessary, to list all persons who control the applicant, together with their affiliates. If any persons or bodies control the applicant jointly because they act together in concert (e.g. because of a shareholder's agreement), each such person must be identified here:

Full name of	Address	Affiliates
individual or body		
N/A	N/A	

3.10 Complete the following table, expanding it if necessary, to list all officerships in other bodies that are held by any individual listed in response to question 3.9, and any affiliates of those bodies:

Full name of individual	Name of body in which officership held	Affiliates of that body
N/A	N/A	

3.11 Complete the following table, expanding it if necessary, to list all bodies corporate which are controlled by any body corporate listed in response to question 3.9, and their affiliates:

Full name of body corporate listed in 3.9	Body corporate controlled	Affiliates of body corporate controlled
N/A	N/A	N/A

3.12 In relation to each body corporate identified in response to question 3.9, complete the following table, expanding it if necessary, to list all bodies which hold or are beneficially entitled to shares, or who possess voting powers, amounting to more than 5% in the body corporate concerned ("participants"). You may, but are not required to, exclude from this table any bodies listed in response to question 3.9. If you are unable to provide a complete answer to this question in relation to beneficial owners, please state whether you have any reason to suspect the existence of any beneficial owners.

Name of body corporate identified in response to question 3.9				
Full name of >5% participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Comments				

Involvement of the applicant in specified activities

3.13 Please state below whether the applicant, or any of the directors, shareholders or other individuals named above, including their associates (i.e. directors of their associates and other group companies), is, or is involved in, any of the below, and the extent of that interest.

Activity/involvement	Yes or No	Please state who is involved; the name of the body/individual/agency they are involved with; and the extent of their involvement
A local authority	No	
A body whose objects are wholly or mainly of a political nature, or which is affiliated to such a body	No	
A body whose objects are wholly or mainly of a religious nature;	No	
An individual who is an officer of a body falling within (b) or (c);	No	

² Please refer to Sections 3 to 5 of <u>Ofcom's religious guidance note</u> for details on how we determine the eligibility of religious bodies to hold certain broadcasting licences.

A body corporate which is an	No	
associate (as defined in		
paragraphs 1(1) and 1(1A) of		
Part I of Schedule 2 to the		
Broadcasting Act 1990) of a		
body falling within (b) or (c);		
An advertising agency or an	No	
associate of an advertising		
agency		

Details of applications, licences and sanctions

3.14 Is the applicant a current licensee of Ofcom?

Yes / (delete as appropriate).

If yes, please provide the licence details expanding the table if necessary:

Licence	Name of multiplex (We do not have multiplex but we do have AM licence,
number	for clarification here are our AM licence details)
CR100145	Bradford Asian Radio Limited (Only AM licence held since 1 st December 2016).

3.15 Has the applicant held an Ofcom broadcasting licence before?

No (delete as appropriate).

Licence number	Name of service or multiplex

3.16 Has anyone involved in the proposed service, held an Ofcom broadcasting licence or been involved in an Ofcom-licensed broadcast service before?

No (delete as appropriate).

If yes, please provide the details expanding the table if necessary:

Dates licence	Licence	Name of service or multiplex
was held or	number (if	
dates of	known)	
involvement		

3.17 Does the applicant control an existing Ofcom licensee?

Yes / (delete as appropriate).

If yes, please provide the licence details expanding the table if necessary:

Licence number	Name of service or multiplex
CR100145	Bradford Asian Radio Limited (Only AM licence held since 1 st December 2016).

3.18 Is the applicant controlled by an existing licensee or by any person who is connected (within the meaning of Schedule 2 to the Broadcasting Act 1990) with an existing licensee (i.e. as a "participant")?

No (delete as appropriate).

If yes, please provide the following information, expanding the table if necessary:

Licence number	Name of service or multiplex

3.19 Has the applicant made any other application to Ofcom (or its predecessor broadcast regulators – the Independent Television Commission and the Radio Authority) for any licence which has since been surrendered by the licensee or revoked by Ofcom (or one of its predecessor regulators)?

No (delete as appropriate).

If yes, please provide the following information, expanding the table if necessary:

Licence number	Name of service or multiplex

3.20 Is the applicant subject to any current or pending investigation by any statutory regulatory or government body in the United Kingdom or abroad in respect of any broadcast-related matter?

No (delete as appropriate).

If yes, please provide the following details expanding the table if necessary:

Licence number (or equivalent)	Name of service or multiplex	Details of the investigation

3.21 Has the applicant – or any person(s) controlling the applicant – ever been subject to a statutory sanction for contravening a condition of a broadcasting licence in the UK or any other jurisdiction?

No (delete as appropriate).

If yes, please provide the following details relating to each sanction expanding the table if necessary:

Licence number (or equivalent)	Name of service or multiplex	Nature of the breach	Sanction imposed	Date sanction imposed

3.22 In relation to any of the directors, shareholders or other individuals named in this application, please provide any information which you think may be a relevant consideration for Ofcom in determining whether or not the applicant is fit and proper to hold a Broadcasting Act licence.

If you have no information to provide, please respond "N/A".

N/A		
IN/A		

3.23 Has the applicant – or any person(s) controlling the applicant – ever been convicted of an unlicensed broadcasting offence?

No (delete as appropriate).

If yes, please provide the following details:

Full name	Date of conviction/action (dd/mm/yy)	Penalty

Financial and business plan

3.24 Explain how the applicant considers it will be able to establish its proposed service. This should include an explanation of the costs required to establish the multiplex service, and how these costs will be met:

Financial and business plan

- 1. We propose to establish the service for the benefit of the local community in Bradford. The local demographics include number of communities but prominently the main ethnic community represents Asian population in and around central wards. This community does not currently have a service dedicated to them on DAB band. As well as the Asian community we propose to serve English and number pf other smaller ethnic minorities communities as well as interest groups seeking equality in the area. We have spoken to several community organisations who have expressed their interest in starting up a service for their respected communities. Copies of their letters of intent, prospective service provider's details are included in part B. The multiplex service will be established using funds that will be given by Bradford Asian Radio Ltd as interest-free loan. The bank statement of the company is attached as evidence. Further funds can be injected by the directors, if required.
- 2. The costs of setting up the multiplex will be met using the funds as above and running costs will be met from the income received from individual services purchasing channels on the multiplex as well as written confirmation from one of

- the largest business empire in the city who has confirmed in writing that they will cover any shortfalls as well as set up costs, the owner of these group of companies, Sekhon Group of companies, is also our director and full participant of this application . Furthermore, we currently have 25 confirmed letters of intent to broadcast.
- 3. Financial viability of existing and future localised community-based services has been a major concern all around, many future and past providers and quality of their provision to communities have significantly suffered due to financial strains. We are already liaising with specialists on this and our plans also involve setting up an independent non-profit city-wide, even potentially national, advice and support body who will assist in improving capabilities, training, advice and assistance with fundraising from various sources so that this huge pressure is sourced out to a specialist company/organisation that will take care of brunt of the financial pressure and only ask for local data and facts etc from the local service. It will also enable local service providers or stations to part take in national campaigns etc and finding comprehensive solution to some of the most pressing and common challenges.
- 4. We are a locally based, run and managed applicant. We have lived and worked in our target communities for decades. Collectively our expertise within the communities is second to none. Our own and all our partners core interest is our local community and their needs. We are not parachuting from another location nor we are commercial venture whose owners or real movers and shakers live on the other side of the world and only know about the city what their highly paid consultants tell them. We went as far as making sure that our financial supporters and most powerful allies/businesses and movers and shakers are locally based, as you can see that one of our key directors if a local business person who has given a full assurance to financially and otherwise support us as part of his social responsibility towards all local communities and not as a business venture; who have local interest at their heart. Propose is not to talk the rhetoric or make an impressive case on paper but instead knowing what is really needed locally through engaging with various or diverse social and economic strata's of the city or from within target area.
- 3.25 Detail the sources of finance that will be used to fund the multiplex service, under the following headings:
- a) Share capital N/A
- b) Loan stock N/A
- c) Leasing/HP facilities (capital value) N/A
- d) Bank overdraft N/A
- e) Grants and donations N/A

- f) Other (please specify) Loan from Bradford Asian Radio Ltd (Please note that the directors of Bradford Asian Radio Ltd are the same as directors of Bradford Multiplex Broadcasting Corporation Ltd)
- 3.26 Provide evidence that sufficient funds are available to each investing shareholder to cover their proposed investment. For incorporated investing shareholders, provide a copy of the most recent statutory accounts.

XThis information has been redacted by Ofcom for reasons of confidentiality

3.27 All of the funding identified above should be confirmed. If any funding has not been confirmed, or if there are any pre-conditions before the funding is released which have not yet been met, provide an explanation of what needs to be done, the dates by which it needs to be carried out, and any steps the applicant needs to take to ensure the funding is confirmed and/or released.

There is no unconfirmed funding. All funds are available for Bradford Multiplex Broadcasting Corporation Ltd's as confirmed in letter from Bradford Asian Radio Ltd.

Relevant expertise and experience

3.28 Please provide details of who will be responsible for the day-to-day general management of the multiplex service (for example, dealing with programme service providers and contractual matters). Please also briefly state their previous relevant experience. (Note that any individuals or contractors who cannot be identified at this stage can instead be included in the confidential section (Part B) of the application form.)

It has not been decided whether the day-to-day operation will be carried out in house, or provided externally within the terms of our maintenance contract by our transmission provider/partner, Commtronix Ltd.

3.29 Please provide details of who will be carrying out the installation and on-going maintenance of your multiplexing / transmitter equipment (or the name of your proposed transmission and multiplex provider if you intend to use a third-party organisation for these services). Please also briefly state their previous relevant experience. (Note that any individuals or contractors who cannot be identified at this stage can instead be included in the confidential section (Part B) of the application form.)

Function	Responsible party	Previous experience
Installation of transmission equipment	Commtronix Ltd	Have installed and maintained many analogue (AM and FM) services in the Uk and Europe. Have provided all technical support and development to Portsmouth and Glasgow SSDAB trial services since launch.
Ongoing maintenance of the transmission equipment	Commtronix Itd	As above
Installation of the Multiplexing equipment	Commtronix Itd	As above
Day-to-day technical management and maintenance of the multiplexing equipment (if different from response to question 3.28 above)	As per paragraph 3.28	

Timetable for coverage roll-out

3.30 In no more than 250 words, please tell us how soon after licence award you expect your multiplex service to become operational and achieve the coverage you are proposing. Please provide an outline project plan with timeline (e.g. a Gantt chart or similar) showing the high level activities and tasks leading up to the launch of your multiplex service:

We expect hardware deliveries to be on a 2-3 months timescale, and during this time will look to sign up contracts with our various service partners.

One of our transmission sites is atop our existing multi-storey office block where our studios are located and should be fairly easy to build without excessive delays.

Our other main transmission site is at Arqiva Idle, and we think this may take 6-9 months to arrange contracts and installation of antenna and transmitter.

We would expect to launch our service no more than 12 months following award of licence.

4. Involvement of C-DSP providers; demand or support from programme providers

About this section

Section 51(2)(ca) of the 1996 Act requires Ofcom to take into account the desirability of awarding a small-scale radio multiplex licence to a body corporate that is providing – or proposing to provide – a C-DSP service in the locality being advertised (or involving such a person as a participant in the licence-holding company).

Section 51(2)(f) of the 1996 Act requires Ofcom to take into account evidence that the applicant has support from providers interested in having their existing or planned programme services carried on the proposed multiplex.

Note that we do not require applicants to provide us with a full-line up of services they intend to provide, or details about the content of those services.

Involvement of C-DSP providers

- 4.1 Is the applicant body proposing to provide its own C-DSP service on the multiplex?
 YES (please delete accordingly)
- 4.2 If the answer to the above question is 'yes', please provide a name and brief details of this proposed service. If the service is already licensed by Ofcom, the licence number should be provided:

Yes, Bradford Multiplex Broadcasting Corporation Limited is a part of Bradford Asian Radio, already broadcasting on 1413Khz AM, under CR licence CR100145.

Our marketing strategy will involve firstly making new people aware of this new future of broadcasting and making sure they enjoy this new way of listening to a quality which will be second to none. We will base ourselves locally and as we have repeated many of times, we will make sure we truly represent all the communities of interest and diversity. Awareness, education, community development, integration, harmonisation and community led broadcasting will also form part of our core plans and future objectives.

4.3	If the answer to the above question is 'no', please provide details of any participant in the applicant body that is proposing to provide a C-DSP service on the multiplex. If the service is already licensed by Ofcom, the licence number should be provided:
N/A	
Den	nand or support from programme providers
4.4	Please provide any evidence which has been gathered of support for the provision of the proposed multiplex service among providers or prospective providers of community or local digital sound programme services in the area to be served by the multiplex service:
Ple	ase refer to part B of this application and appendices for the details and evidence.

5. Fair and effective competition

About this section

Section 51(2)(g) of the 1996 Act requires Ofcom to assess whether, in contracting or offering to contract with programme service providers, the applicant has acted in a manner calculated to ensure fair and effective competition in the provision of community and local digital sound programme services.

In assessing applications, we need to have confidence that the prospective small-scale radio multiplex licensee has approached a wide range of potential service providers. Negotiations that have taken place between the applicant and potential service providers need to have been demonstrably fair, and the terms of any contract for service provision must be fair and non-discriminatory.

Applicants should note there are two further questions relating to fair and effective competition in Part B of the application form.

- 5.1 Please detail the measures that have already been taken, and will be taken before and during the licence period, to demonstrate that, in contracting or offering to contract with programme services providers, the applicant has acted in a manner calculated to ensure fair and effective competition in the provision of such services:
 - 1. We, with large number of local media partners on board and widespread support within the community, wish to apply for a small-scale DAB multiplex to meet the demonstrable demand for the community radio as well as smaller commercial radio stations and even some potential new extremely localised and community based entrants to join our multiplex on an affordable digital radio pathways to enable them to serve or communicate with their specific community of interests and significantly help them to enable them to carry out positive social change within some extremely marginalised communities is something that is desperately needed within this city. We think it is a golden opportunity to create a small-scale radio multiplex that is of the people, by the people and for the people. Core idea is to make sure it does not become a purely commercial agenda or same provider setting up service all over but we will make sure that various services are genuinely rooted in the local communities.
 - 2. We first made our intent to apply public as soon as we found out about Ofcom awarding these licences in the near future. We started connecting almost all the local radio stations to inform them of our intent. One of the larger commercial local radio stations expressed their interest in applying for the licence themselves and did not entertain us but our approach to about 25 other radio stations was very fruitful. Some formally came on board, some expressed their intent to come on board after the licence is granted and others expressed provisional interest in the projects; however, vast majority are on board.
 - 3. All the partners and we can confirm that our key objective has been and through this multiplex will be the provision of 'social gain'. The organisation and communities involved

- and key partners will be making sure that they are part of our core structure of accountability plans who will be representing all the target communities. Direct community participation, training, development and engagement in the service will be part of our core objectives. Community development, participation, training and education will be our key focus, as supposed to established way of commercial motivated programming.
- 4. As a local company that is deep rooted within the local community, we have been supported and backed by huge amount of contacts within the media, prominent local political and business communities. Due to this footwork we have identified number of new entrants and together we will be encouraging large number of new entrants into this field, who will serve their very localised interests and community-based station; we aim to deliver a service where no community feels left out from mainstream media.
- 5. As far as operational side is concerned, we have provisionally agreed that all service providers will enter into service provider carriage agreement. Most of the terms and conditions will be industry standard and identical to all Service Providers. Fees will be based on our price list which will be based on capacity usage and it will be industry standard and it has been kept extremely reasonable, in some cases even free for certain types of organisation, as highlighted on this form. We have also decided that, at our discretion we may offer a discounted rate or I some cases even zero rate to Service Providers who are a local registered charities, hospitals and care homes etc.
- 6. On a technical side, we will make sure high standard are upheld through entering into separate Industry standard technical service level agreement with each provider.
- 7. As any publicly and widely supported as well as monitored organisation ought to do, we will make sure we are transparent and we will act in an open and transparent manner and it is part of our comprehensive company policy. Part of this transparency starts now where instead of working through shadows while running our own stations, at an outset, we would like to confirm that some of our directors might be directly or indirectly involved within local media or a radio station but we will make sure that every step is taken to make sure no conflict of interest takes place; we are doing this by keeping the two areas as engineering and technical facilitators and any involvement with provision of content totally separate and transparent; all our contracts/agreements with other providers will take care of this too. We will also strictly monitor and restrict number of stations run by us to maximum of two in any given location. In short we will take every single step and adopt policies that will ensure that all the processes around access to multiplex are fully transparent and equitable.
- 8. We feel this small-scale DAB licenses have been designed for exactly people like us with large number of our local partners who will be best suited to take this agenda forward, as team of people with one of the organisation leading. Sadly, being an AM station that lacked crisp clear sound quality previously, there are consequential setbacks when one is so grass root and running on such humble and basic sound frequency whereby people often complaint about the clarity and sound quality of the broadcasts, which can be frustrating for communities we serve and local grass root people who volunteer or train with us. Our history of communication with Ofcom will show that we have persistently requested the sound quality to be made better so that a community-based venture can stand on equal footings, or at least sound quality wise, with powerful local commercial interests, in other

words we do all the hard work to train and someone commercial gains instead of the communities. Second and more significant consequence is brain drain from community base stations to self-serving commercial interest base companies and establishments; vast majority of quality presenter from grass root communities whom we train and who love to serve communities end up working for commercial establishment as they wish to be able to communicate through higher sound quality medium or gain more publicity. In voicing concern, i.e. requesting that grass root communities ought to given key role to lead on this and be made capable of delivering higher quality broadcast through better quality digital means, we are not alone because many communities of interests and mainstream community agrees with our future plans to make local digital radio more for the people, by the people and of the people. Consequently, we have a very widespread support from within the communities and from the media industry. For example, we have 25 media organisation already committed, 11 are Bradford based radio stations, and further 14 from surrounding areas. Some key local business leaders and some other movers and shakers are also fully supportive. For example, as part of their social and community responsibility and community service one of the largest business empire in the city is fully committed, so much so that their overall owner is one of our directors and he has given a formal financial undertaking to cover any future financial challenges we might face. This support is merely a tip of an iceberg of the level of support we have locally, because due to Covid lockdowns and office closures etc we have not been able to fully engage to all our stakeholders and future partners. Not only that but number of local communities organisations, charities and MP's are fully on board, for example 20 local charities have fully agreed to support and work with us with our future plans on board. All of these are fully support our application. In many cases even some commercial ventures/station wish to be part of our ongoing struggle to make our media, particularly radio, serve all our local communities without exception and without self-serving commercial interests.

6. Declaration

About this section

This form must be submitted by the body corporate which will hold the licence. The declaration must be certified by a company director or the company secretary, and covers all information provided by in the applicant in both Part A and Part B of the application form. The declaration must also be dated.

- a) I hereby apply to Ofcom for the grant of a licence for the small-scale radio multiplex licence described above and declare that the information given in this application form is, to the best of my knowledge and belief, correct.
- b) I further declare and warrant:
 - i) that the applicant is not a disqualified person within the meaning of that expression as defined in Part 2 of Schedule 2 to the Broadcasting Act 1990, as amended, or as a result of a disqualification order under section 145 of the Broadcasting Act 1996;
 - ii) that having made all reasonable enquiries neither the applicant nor any person controlling the applicant, as result of the grant to me of the licence, breach any requirement of Schedule 14 to the Communications Act 2003 with regard to the accumulation of interests in broadcasting services or to the restrictions on crossmedia interests;
 - iii) that the applicant is not disqualified by virtue of the provisions of section 143 (5) of the Broadcasting Act 1996 in relation to political objects and the provisions of section 144 (3) of the Broadcasting Act 1996 in relation to the provision of false information or through the withholding of information with the intention of misleading Ofcom; and
 - iv) that no director or person concerned directly or indirectly in the management of the Licensee is the subject to a disqualification order as defined by section 145 (1) of the Broadcasting Act 1996.
- c) I understand that Ofcom reserves the right to revoke the licence (if granted) if at any time any material statement made to Ofcom is found to be false and to have been by the applicant or any member or officer thereof knowing it to be false. I also understand that under sections 144 and 145 of the Broadcasting Act 1996, the provision of false information could incur a criminal conviction and a disqualification from the holding of a Broadcasting Act licence. I further certify that, to the best of my knowledge, any matters which might influence Ofcom's judgement as to whether the directors and substantial shareholders involved in this application are fit and proper persons to participate in a radio licence, have been made known to Ofcom.

Full name (BLOCK CAPITALS) of the person authorised to make the application of behalf of the applicant:

SYED SIBT UL HASSAN SHIRAZI

Date of application:

22/11/2020

I am authorised to make this application on behalf of the applicant in my capacity as (delete as appropriate):

Company secretary / company director.

You now need to complete the <u>confidential section (Part B)</u> of the application form.