
Small-scale radio multiplex licence

Application form – Part A (public)

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

Bradford Digital Media Limited

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

The Bradford Polygon Area

Public contact details:

Usha Parmar

Bradford Digital Media Limited

55 Leeds Road

Little Germany

Bradford

BD1 5AF

Telephone: 01274 735043

Publication date: 1 September 2020

1. Overview

In a digital world the future of the independently-owned Bradford commercial radio licensee Sunrise Radio is dependent upon a professionally managed multiplex operation, delivered at a cost that is proportional.

Sunrise's digital arm, Infocus established Bradford Digital Media as a platform where local community radio and RSL broadcasters could collaborate to build a shared digital future.

We have reached-out to a total of 42 different programme services.

All Bradford Digital Media participants are local to the Bradford area.

A critical factor is coverage. Our technical plan was developed with the objective that coverage of the Bradford small-scale radio multiplex should replicate the Sunrise FM licensed area.

Bradford Digital Media has passed a number of milestones in meeting or exceeding Ofcom's award criteria. These are summarised at the beginning of the Part B application form.

Bradford Digital Media would be led by Usha Parmar who not only is the longest-serving UK local radio Chief Executive, but has been recognised for her work dealing with humanitarian issues and promoting women in business.

2. Extent of proposed coverage area

- 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):

The extent of our proposed coverage equates to 80% of the Ofcom licence area population

Overview

The financial viability of a small-scale DAB multiplex service is primarily dependant upon delivery of a robust and reliable signal that can be received by listeners within a large part of the polygon area. This is coupled with a crucial need in this case, to replicate as much as possible, the FM coverage of the independently-owned local commercial radio licensee for Bradford (Sunrise Radio) thereby ensuring a seamless migration in the event of a digital switchover.

Bradford Digital Media proposes to achieve these objectives.

Description of the target area

This polygon area is one of extremes with the highest point being 282 metres A.O.D the lowest 47 metres A.O.D. Within the polygon three valleys converge to make a 'Y' shape making the propagation of Band III radio signals challenging.

Within the advertised area

Bradford Digital Media proposes to target Bradford city and all significantly sized localities within the Ofcom polygon area.

This may be described as covering Saltaire, Shipley and Baildon in the northern part of the area across towards the north west perimeter of the polygon including Hawksworth Common.

From the edge of Thornton in the west (including Allerton) across to the northern part of Thornbury and part of Pudsey in the east. South of Bradford city we would seek to cover much of Queensbury, Clayton and Bowling, across to Tong.

Outside the advertised area

Lying on, but just outside the polygon line in the north east is Guiseley and Yeadon, two localities we would aim to serve along with Horsforth.

Our coverage prediction shows robust coverage of all these areas.

Based on our predicted coverage plot Bradford Digital Media aims to deliver a multiplex service to just over 300,000 adults. This figure includes coverage outside the advertised area.

- 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.

A coverage prediction map showing the 63 dB μ V/m contour at 10m within the marked Ofcom polygon area may be viewed at [Appendix 1](#).

For comparative purposes the FM coverage of the Bradford Licensee Sunrise Radio may be viewed here: <http://static.ofcom.org.uk/static/radiolicensing/mcamaps/al000037.pdf>

For population data and other Extent of Coverage information please see [Appendix 3](#) (submitted in response to 2.1 of [Part B](#) of this application).

- 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 v11.6.6
Detail the terrain model used by the software and its resolution.	SRTM Resolution: 0.3-3 Arc-seconds
Detail the ground cover (clutter) data used by the software and its resolution.	ESA GlobCover Resolution: 1/360°
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	Pixel by pixel power-summation

Small-scale radio multiplex licence: application form (Part A)

<p>If these predictions have not used Ofcom-provided population data, state what population data has been used and its source.</p>	<p>Population data used in this application has been based on ONS 2011 figures. Desk analysis by electoral ward has been undertaken and in cases where partial coverage of a ward at the 63dBμV/m contour occurs, a detailed assessment has been applied. For partial coverage in wards outside the polygon area, population coverage assessments have been upweighted to ensure an adequate margin of compliance between the licence area population total + 30% and our predicted coverage.</p> <p>Bradford Digital Media confirms that it will accept Ofcom's interpretation and assessment of the population covered.</p>
<p>Have your predictions been generated by a commercial organisation? If so, by whom?</p>	<p>Yes Associated Broadcast Consultants</p>

3. Ability to establish the proposed service

Applicant's details

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

Bradford Digital Media Limited

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

12688903

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:

Sunrise House, 55 Leeds Road, Little Germany, Bradford BD1 5AF

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

Yes

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	Usha Parmar
Job title	Director
Address	55 Leeds Road, Little Germany, Bradford BD1 5AF
Telephone	01274 735043
Mobile phone	07931 788 062
Email	usha@sunriseradio.fm

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
Usha Parmar	55 Leeds Road, Little Germany, Bradford BD1 5AF	UK	<u>Director</u> Bradford City Radio T/A Sunrise Radio (Yorkshire) Broadcaster <u>Director</u> Spice Entertainment Ltd Hospitality <u>Director</u> Infocus Digital Media Ltd Media <u>Director</u> Leeds Digital Media Ltd Media <u>Trustee</u> Rishi's Vision Charity <u>Trustee</u> Jai Maa Bhameshwari Kali Mandir Charity	CEO Bradford City Radio T/A Sunrise Radio (Yorkshire)

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

Small-scale radio multiplex licence: application form (Part A)

Rajan (Raj) Parmar	55 Leeds Road, Little Germany, Bradford BD1 5AF	UK	<p><u>Director</u> Bradford City Radio T/A Sunrise Radio (Yorkshire) Broadcaster</p> <p><u>Director</u> Spice Entertainment Ltd Hospitality</p> <p><u>Director</u> Infocus Digital Media Ltd Media</p> <p><u>Director</u> Leeds Digital Media Ltd Media</p> <p><u>Trustee</u> Alan Foster Trust Charity</p>	Executive Director Bradford City Radio T/A Sunrise Radio (Yorkshire)
Raghvir Singh Sangha	55 Leeds Road, Little Germany, Bradford BD1 5AF	UK	<p><u>Founder Member</u> Sab Rang Radio Broadcaster</p>	N/A
Qamar Zaman	55 Leeds Road, Little Germany, Bradford BD1 5AF	UK	<p><u>Director</u> Confiar Clothing Ltd Retail</p> <p><u>Director</u> S&Q Digital Media Ltd T/A Radio Apni Awaz Broadcaster</p> <p><u>Director</u> Islam Radio Ltd T/A Marefa Radio Broadcaster</p>	Executive Director Confiar Clothing Ltd

Small-scale radio multiplex licence: application form (Part A)

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
Infocus Digital Media Ltd	55 Leeds Road, Little Germany, Bradford BD1 5AF
Sab Rang Radio	171 Bradford Road, Idle, Bradford BD10 8SN
S&Q Digital Media Ltd	23 Dovesdale Road, Bradford BD5 9QB
Islam Radio Ltd	Duram House, 1st Floor, 107 Cemetery Road, Bradford BD8 9RX

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	

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 individual or body	Address	Affiliates
Usha Parmar	55 Leeds Road, Little Germany, Bradford BD1 5AF	Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) Infocus Digital Media Ltd Leeds Digital Media Ltd
Rajan Parmar	55 Leeds Road, Little Germany, Bradford BD1 5AF	Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) Infocus Digital Media Ltd Leeds Digital Media Ltd

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
Usha Parmar	Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire)	Infocus Digital Media Ltd Leeds Digital Media Ltd

Small-scale radio multiplex licence: application form (Part A)

Rajan Parmar	Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire)	Infocus Digital Media Ltd Leeds Digital Media Ltd
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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	

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
Infocus Digital Media Ltd	57,600	£57,600.00	96%	96%
Comments				
Infocus Digital Media Ltd is owned by Usha Parmar (50%) and Rajan Parmar (50%)				

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	N/A
A body whose objects are wholly or mainly of a political nature, or which is affiliated to such a body	NO	N/A
A body whose objects are wholly or mainly of a religious nature; ²	YES	Usha Parmar is a Trustee of Rishi's Vision (Charity) and a Trustee of Jai Maa Bhameshwari Kali Mandir (Charity) <i>Please see 3.22 (below)</i>
An individual who is an officer of a body falling within (b) or (c);	NO	N/A
A body corporate which is an 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);	NO	N/A
An advertising agency or an associate of an advertising agency	NO	N/A

Details of applications, licences and sanctions

3.14 Is the applicant a current licensee of Ofcom?

No

² Please refer to Sections 3 to 5 of [Ofcom's religious guidance note](#) for details on how we determine the eligibility of religious bodies to hold certain broadcasting licences.

Small-scale radio multiplex licence: application form (Part A)

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

Licence number	Name of multiplex
	N/A

3.15 Has the applicant held an Ofcom broadcasting licence before?

No

Licence number	Name of service or multiplex
	N/A

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

Yes

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

Dates licence was held or dates of involvement	Licence number (if known)	Name of service or multiplex
1989 to date	AL000037BA/2	Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire)
1999 to date	-	Sab Rang Radio (two local RSL broadcasts every year)
June 2001	-	Mela FM (RSL in Manchester)
2002 - 2004	-	Club Asia London Ltd
2004 to date	DP000061BA	Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire)
2004 - 2013	DP000061BA	Bradford City Radio Ltd T/A Masti Radio
2016 - 2020	DP000061BA	Glasgow Small-scale Multiplex Trial service
2016 to date	DP000061BA	Manchester Small-scale Multiplex Trial service
Nov 2004	RSL	Ramadhan Radio Keighley
Oct/Nov 2005	RSL	Ramadhan Radio Wakefield
Oct/Nov 2005	RSL	Ramadhan Radio Keighley
2006	RSL	Radio Apni Awaz - Bradford
2006	RSL	KCO Radio Keighley

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2007-2011	RSL (annually)	Ilm Radio Blackburn
2014/2015		Radio Paigham (DAB) Bradford & Huddersfield Local Mux.
Nov/Dec 2014	RSL	Radio Paigham
Jun/Jul 2015	RSL	Ramzan FM Bradford

3.17 Does the applicant control an existing Ofcom licensee?

No

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

Licence number	Name of service or multiplex
	N/A

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”)?

Yes

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

Licence number	Name of service or multiplex
AL000037BA/2	Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) Usha Parmar and Rajan Parmar are directors of both entities

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

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

Licence number	Name of service or multiplex
	N/A

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

Small-scale radio multiplex licence: application form (Part A)

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
	N/A	

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

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
	N/A			

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”.

In answer to 3.13 (above) this application shows Usha Parmar as a trustee of two charities. This information has been provided in order to be consistent with information provided in the Declaration for Sunrise Radio (Yorkshire) licence AL000037BA/2 (Bradford City Radio Ltd). Although both charities are founded through the work of religious bodies, we believe Ofcom will regard their objects as being neither of a 'wholly or mainly' religious nature.

Other information supporting the director's fitness and propriety

Usha Parmar

Usha has for many years played a leading role in Bradford civic society.

Recognised and awarded for breaking down political and social barriers in the community (1999 Asian Business Woman of the Year).

Business Woman of the Year 2000 and 2001.

2009 received a Lifetime Achievement Award from the Hindu Cultural Society of Bradford.

Through the radio station Usha has nurtured new talent through training, promoted awareness of humanitarian issues such as domestic violence and social/business issues such as women in business.

Board member of The Bradford District Sustainable Development Partnership.

2019 recipient of an Honorary Fellowship from University Centre Bradford College.

Raj Parmar

Over the last 11 years has been recognised for, and contributed towards, Bradford civic society.

2009 his events and entertainment agency business - Spice Entertainment received a Community Harmony Award for an 'outstanding contribution to community harmony in the Bradford district'.

Organiser of free self-defence classes for women and children; established blood donor recruitment events for Delete Blood Cancer – Bradford.

2019/2020 Member of Give Bradford.

Trustee of the Alan Foster Trust.

Active steering group member for Bradford Disability Games 2021.

2019/2020 Representing Bradford as Ambassador on behalf of Believing in Bradford.

Steering group member of Bradford 2025, Bradford's bid to be recognised as City of Culture.

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

No

If yes, please provide the following details:

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

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:

*To illustrate our answer more fully and in accordance with 3.19 of Ofcom’s Guidance Notes for Applicants (which requests as full answers as possible and to use additional sheets if required) please also see **Appendix 5** submitted with Part B (the confidential Application Form) (5.1).*

Resources combined with experience; and an understanding of business and broadcasting; together with a realistic plan, will enable Bradford Digital Media to establish the proposed service

Establishment of the service

In addition to robust coverage throughout the advertised area (please see 2.1 above) signal reliability is perhaps the second most important operational factor when running a small-scale radio multiplex service. We have budgeted for professional engineering contractors to install and more importantly, maintain, our transmission system thereby ensuring the service levels agreed with those taking carriage are met.

Explanation of the costs

To build a small-scale multiplex initially requires capital costs. Expressed as a total figure required to build-out the proposed service, capital costs can be expected to be within the range of between £20,000 and £60,000 depending on the level to which the transmission system is engineered and the number of transmission sites employed. The figure above includes transmission and ancillary equipment.

Operating costs, expressed as a Year 1 annual figure will be within the range £25,000 and £50,000. This includes site rental, contractor costs, administrative costs and licence fees.

Pre operational costs, costs accrued in the period before receipt of revenue from selling carriage capacity, can be expected to be within the range £5,000 and £12,000.

Bradford Digital Media and the costs

Allowing for contingencies and other costs we have assumed a point in the upper quartile on each range of the figures set out above.

This would suggest that capital costs and pre-operational costs would be in the order of £59,000. The shareholders of Bradford Digital Media are in a position to make this sum available from personal wealth.

To ensure liquidity during the first months of trading, additional sums will be made available by the shareholders and will be drawn down on an 'as required' basis by Bradford Digital Media.

Income and how these costs will be met

Separately we have completed an assessment into the revenue earning potential of the Bradford licensed multiplex service. This includes an assessment of the service providers market, both locally and wider as well as market intelligence to identify where our proposed rates of charge for C-DSP carriage and DSP carriage fit within this new tier of digital broadcasting. As this information is market sensitive, we have submitted it in confidence.

The costs explained above are also shown in more detail in **Appendix 5** submitted in confidence. This together with our response to 3.25 and 3.26 (below) explains how these costs will be met.

3.25 Detail the sources of finance that will be used to fund the multiplex service, under the following headings:

a) Share capital

Bradford Digital Media Ltd will be funded by share capital of £60,000. The following shareholders/companies will be subscribers:

Infocus Digital Media Ltd

Raghvir Singh Sangha

- 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)

Should additional capital be required to facilitate overruns or trading demands in the early months (particularly during the first year) then Bradford Digital Media Ltd will draw down agreed borrowing, as required, in the form of loans from the shareholders listed above. Interest charged will not be greater than 1% above the LIBOR benchmark interest rate.

- 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.

✂ This 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.

Funds will be made available with immediate effect on award of licence.

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.)

Displaying business acumen together with an in-depth understanding of broadcast radio, two highly experienced radio executives with an extraordinary network of industry contacts will lead in managing Bradford Digital Media

General managerial experience

The general management of the multiplex will be shared between two director/shareholders **Usha** and **Raj Parmar** both of whom live and work in the local area.

Importantly, their previous relevant experience outlined briefly below will be supplemented by the support of specialists who are well positioned to advise, plan, implement, build-out, test and maintain the service going forward.

Please see **Part B (5.1)** of the application for further information.

Usha and Raj spearhead the Executive team at Sunrise Radio (Yorkshire) where as director/shareholders they utilise on a daily basis, a wide range of governance, compliance, broadcasting, general managerial and leadership skills.

These range from management and administration of sales contracts to overseeing programming and presenter direction, studio management, project management, accounting, sponsorship and airtime sales, marketing, website design and maintenance, creating social media initiatives and through other businesses – project, event and logistics management.

Usha and Raj have made their mark over a number of years as highly successful radio station operators and their proven track record shows that they are more than capable of managing the establishment of the multiplex and conduct successful relationships with those seeking carriage.

Together they have led Sunrise Radio (Yorkshire) as early adopters of DAB radio broadcasting. In 2004 two Sunrise services were carried on the Bradford and Huddersfield multiplex. Today the company holds a DSP licence and in addition to broadcasting on the 'relevant' local DAB multiplex, Sunrise was one of the first radio companies to reach audiences via the Manchester and Glasgow small-scale DAB trial multiplexes.

Earlier this year Usha and Raj founded Infocus Digital Media Ltd, a company that is the digital arm of the Sunrise Radio (Yorkshire) analogue radio service.

Usha and Raj are supported at director level by two experienced radio personnel Raghvir Singh Sangha and Qamar Zaman.

Raghvir was instrumental in starting Sab Rang radio for the Punjabi community in Bradford in 1999, to propagate Gurbani, Culture, Social, Literary and Educational aspects of the target community. As a businessman he has wide range of experiences of radio station management including fund raising, procurement, controlling programmes, recruitment and training. He is well conversant with the requirements of compliance for operating a community radio service.

Qamar has a range of experience-based skills drawn from the radio, TV and film industries that focus on a number of operational specialities. These include compliance, sales and contract negotiation and management accounting. Between 2004 and 2015 he has participated in RSL and DSP radio ventures.

Further experience held by both Usha and Rajan is outlined below.

Usha

Former teacher turned project manager for an IT company.

Early 1990s appointed to turn-round ailing Incremental Radio station Sunrise Radio (Yorkshire).

2002 - Launch Director – Club Asia London Limited

1991 to date, Director, shareholder and Chief Executive of Sunrise Radio (Yorkshire). Currently the longest serving UK radio Chief Executive.

Raj

2001 - RSL operator – Mela FM (Manchester) on behalf of the Manchester Multicultural Mela 2001.

2002 - Presenter providing cover on London-wide broadcaster Club Asia.

2004 – 2013 managed the Masti Radio service which was carried on the Bradford & Huddersfield Multiplex.

2007 to date - Director and shareholder Sunrise Radio (Yorkshire)

Technical competence

Sunrise Radio (Yorkshire) currently contracts out certain engineering aspects that ensure the radio station stays on air.

The same approach will be applied in respect of Bradford Digital Media. This is explained more fully in answer to **5.1 of Part B of this application.**

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	Third-party organisation	Please see Application Form Part B (5.1)
Ongoing maintenance of the transmission equipment	Third-party organisation	Please see Application Form Part B (5.1)
Installation of the Multiplexing equipment	Third-party organisation	Please see Application Form Part B (5.1)
Day-to-day technical management and maintenance of the multiplexing equipment (if different from response to question 3.28 above)	Third-party organisation	Please see Application Form Part B (5.1)

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:

Bradford Digital Media, award to operationally live: 12 to 14 months

We recognise two overriding circumstances which have the potential for disruption so we allowed for these in our assessment.

1. UK withdrawal from the European Union

At the time of writing we do not know what tariffs and costs and delivery bottlenecks might affect essential components leaving the EU bound for UK suppliers and ourselves.

2. Worldwide Coronavirus Pandemic

COVID has impaired the operational efficiency of business, authorities, government and others. This situation remains fluid.

As a small organisation we shall remain 'fleet of foot', adapting to ameliorate prevailing circumstances.

Our plan

We have identified seven facets to the successful launch of our multiplex service:

Company housekeeping,
Premises,
ACI,
Mast/Mux & TX Equipment,
Connectivity/Distribution,
Customer and Carriage, and
Conclusion Procedures.

Our high-level Gantt chart lists 26 key activities. Most activities will be resolved within four weeks, but as to be expected, certain activities could take much longer to conclude. For example, we have adopted a worst-case scenario in terms of time spent resolving any potential risk of causing undue interference (five months) and in obtaining international frequency clearance (six months). Both these elements have been highlighted in yellow on the plan. Without due consideration of these factors we could have set a launch date of nine months from award of licence.

The Project Plan Timeline (**Appendix 4.**) illustrates where activities are dependant upon predecessor activities being concluded.

Based on May 2021 award, the erection of masts will be scheduled for the end of March 2022, a time of greater optimism for improving weather conditions.

Finally, our conclusion procedures have been scheduled comfortably ahead of the 18-month statutory deadline, e.g. in the event of international clearance being necessary, six months has been allowed from month nine.

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

Involvement of C-DSP providers

4.1 Is the applicant body proposing to provide its own C-DSP service on the multiplex?

No

Sunrise Radio FM - an exceptional circumstance

In this case, Bradford Digital Media is closely linked (see 3.18) with Sunrise Radio (Yorkshire) a commercial radio licensee, and as such is prohibited from holding a C-DSP licence.

Sunrise is one of the original Incremental Radio Contractors established under the legacy regulator the IBA and has remained independently owned for thirty years. Receiving financial or other support from a parent company is not an option.

Sunrise Radio (Yorkshire) is seeking a long-term digital future on the DAB platform. However, under the present Local DAB Multiplex licensing regime this presents severe operational challenges in terms of both coverage and affordability. The present Bradford and Huddersfield Multiplex is geographically too large as it extends too far beyond our target area. Such broad coverage also comes at a premium.

The more measured scale of Ofcom's small-scale DAB multiplex polygon for Bradford provides security for Sunrise Radio (Yorkshire) into the next decade.

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:

N/A

- 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:

Three proposed C-DSP service providers are participants in Bradford Digital Media

Raghvir Singh Sangha is one of the founder members of **Sab Rang Radio** a biannual RSL in Bradford that first launched in 1999 providing a music service for the Sikh community during the festivals of Vaisakhi and Diwali.

Raghvir Singh Sangha is a director and shareholder in Bradford Digital Media (see 3.6 above) and is a participant.

Sab Rang Radio intends to apply for a C-DSP licence in order to commence full-time broadcasting. The service would be carried on the Bradford Digital Media multiplex.

Qamar Zaman has participated in DSP and RSL services almost every year between 2004 and 2015 in the Bradford, Keighley, Wakefield, Blackburn and Huddersfield areas. Qamar Zaman is a director of Bradford Digital Media and is a participant.

His programme services **Radio Apni Awaz** and **Marefa Radio** both intend to apply for C-DSP licences in order to commence full-time broadcasting. Carriage Heads of Agreement have been signed with regard to carrying these services on the Bradford Digital Media multiplex.

Demand 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:

Twenty-four providers of programme services have returned written expressions of interest

These expressions are indicative of their support for our provision of the proposed multiplex service for Bradford.

Gaydio	Sunrise Radio Gold
45 Radio	Asian FX
Hope FM	Radio Paigham
Radio Apni Awaz	Marefa Radio

Small-scale radio multiplex licence: application form (Part A)

Sab Rang Radio	Vibe Yorkshire
Voice of Islam	Panjab Radio
Cosoro	Rhubarb Smoothies
Phoenix Radio	Sunrise Radio (Yorkshire)
British Indian Tamil Radio	Bengali Radio Live
Rombalds Radio	The Groove
Calder Valley Radio	Podcast Radio
Fever FM	

We can add to this list an additional service which has expressed commitment in confidence.

From this list of 24 providers of programme services we can confirm 20 of these services (6 C-DSP and 14 DSP) have signed up to broadcast on the Bradford Digital Media multiplex, if awarded a licence.

This commitment takes the form of signed Heads of Agreement, copies of which are enclosed with Part B of our application.

5. Fair and effective competition

- 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:

Our ethos of inclusivity and fairness shared with a wide range of potential providers, has been a keystone in our negotiations

Measures taken prior to licence advertisement

Our website (www.bradforddab.com) setting out our intention to apply for this licence has been operational since 17th June 2020.

Online coverage has included news published in the UK’s radio news website Radio Today and in the media business news and entertainment website BizAsia. We have also made contact with local press such as the Bradford Telegraph and Argus.

We have promoted our multiplex proposal and the opportunity it presents to those with DAB aspirations, through social media.

From this, prospective applicants seeking DAB carriage will have become aware of our intentions. This in turn has driven our website where radio service providers can register their interest.

Bradford Digital Media Summary of Social Media Activity 12-weeks to mid-November

Activity:	Twitter	Linkedin	Facebook
Followers/likes	33	14	206
Impressions/Visitors/Views	6,300	51	76
Facebook Post Reach	-	-	577

Our website:	Total	Desktop	Mobile
Visits:	459	296	163
Views:	1,189	827	362

Bradford Digital Media’s social media activity can be measured in thousands and this has driven our website activity, which can be measured in hundreds.

In 2018 prior to Ofcom's advertisement we contacted and discussed the digital aspirations of each of the following radio services.

Each listed here expressed an interest in providing a Programme Service:

Akash Radio - CR100143BA/1	Ananda Radio (new service)
Drystone Radio – CR000148BA/3	Sunrise Radio (Yorkshire) - AL000037BA/1
Fever FM – CR000031BA/3	Delite Radio (currently on Manchester SSDAB Mux)
Gaydio – CR000186BA/1	Festival Radio (new service)
Sab Rang Radio (RSL)	London Greek Radio – AL100200BA/1

Between June 2020 and prior to Ofcom's advertisement in September 2020 we contacted in writing each licensed analogue community radio service and other radio operators including applicants of previously unsuccessful community radio licences, existing Digital Licence holders, RSL licensees and online radio service providers.

Please see list below:

Bradford Community Broadcasting	Radio Mac
Bradford Asian Radio	Dales Radio
Gaydio	Drystone Radio
45 Radio	Radio VOB
Hope FM	Xpression FM
Voice of Islam	Sunrise Radio Gold
Cosoro	Asian FX
Phoenix Radio	Podcast Radio
British Indian Tamil Radio	Branch FM
Radio Caroline	House Party Radio
News Radio UK	Rhubarb Radio
Rombalds Radio	Radio Paigham
Rhubarb Smoothies	Sab Rang Radio
Calder Valley Radio	Panjab Radio
All Islam Radio	Sunrise Radio (Yorkshire)
Fever FM	

Since Ofcom's advertisement in September 2020 we have contacted some additional service providers:

Radio Royal	St. Lukes Sound
Ram Air	Deep Stuff Radio
Bengali Radio Live	Deep Stuff Radio 1 Extra
The Groove	Vibe Yorkshire
Radio Apni Awaz	Marefa Radio

We can add to this list an additional service which has expressed commitment in confidence.

Total number of services contacted: 42

25 of these 42 services target listeners whose tastes and interests are aligned with more mainstream interests i.e. 59.5 % are not targeting specifically, those with connections to the wider Indian sub-continent. A full analysis can be provided. This we believe demonstrates our concerted efforts to adopt an all-inclusive policy with regard to the services our multiplex would carry.

Contact has been maintained with community, RSL, online and other radio operators from immediately prior to Ofcom's licence advertisement, to date.

Measures taken during the licence advertisement period

We produced a provisional Rate Card which illustrates indicative fees, dependent upon a final appraisal of our operating costs and population coverage, and have circulated preliminary terms of carriage contracts and discussed these with a number of different potential service providers so as to underline our ethos of being universal and non-discriminatory. The line-up of our programme services underscores our approach.

Measures to be taken during the licence period

We propose to maintain a similar open process during the licence period where each service provider will sign a carriage agreement with common objects and terms. Fees charged will vary. For example, C-DSP licensees eligible to access reserved capacity, subject to availability, can expect to pay a lower market rate pro-rata than DSP service providers occupying unreserved capacity.

Also, during the licence period, Bradford Digital Media will publish its Rate Card on the website.

An annex to the agreement will set out the service levels agreed relating to emergency outage and planned maintenance of the network.

We shall implement and where necessary develop further, our competition compliance policy where we shall not share commercially sensitive information or discuss customer terms with competitors. Company practices and agreements will be reviewed periodically to ensure they comply with competition law.

Bradford Digital Media's approach to competition

As set out in 3.6, 3.18 and elsewhere, Bradford Digital Media is closely linked with Sunrise Radio (Yorkshire) however, this close connection is not something that impedes our approach to fair competition. This is evidenced by allowing directly competing radio stations which target the same audiences as Sunrise Radio, onto our proposed multiplex.

Conclusion

The measures adopted by Bradford Digital Media detailed above in answer to 5.1 of this form, are when taken as a whole, calculated to ensure fair and effective competition.

As demonstrated above:

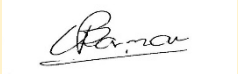
- Bradford Digital Media has approached a wide range of potential radio services.
- The negotiations and establishment of terms 'within group' (C-DSP or DSP) have been the same and therefore demonstrably fair.
- Our ethos of inclusivity forms the basis of a fair and non-discriminatory approach.

A list of prospective providers together with the nature of proposals discussed and supporting documents have been set out in answer to 6.1 in Part B of this application.

6. Declaration

- 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 cross-media 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:

	USHA PARMAR
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Date of application:

18 November 2020

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

Company director