

# Small-scale radio multiplex licence

# Application form – Part A (public)

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

PlymDab Ltd

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

Plymouth

#### **APPLICATION FORM:**

Publication date: 14 July 2022

# Contents

## Section

2. Extent of proposed coverage area	2
3. Ability to establish the proposed service	6
4. Involvement of C-DSP providers; demand or support from programme providers	21
5. Fair and effective competition	23
6. Declaration	27

# 2. Extent of proposed coverage area

2.1 Please 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):

Plymouth is 'Britain's Ocean City' - and was once the centre of the south west's media industry, when BBC television and radio, an ITV station and two commercial radio stations operated from within its boundaries. Today only the BBC remains, but the advent of a small-scale DAB multiplex provides the opportunity for regeneration of a broadcasting community in Plymouth.

In developing our proposition, we have kept in mind three guiding principles:

- Delivering a reliable, consistent and high-quality DAB service to as many households in the polygon as possible
- Making the service affordable to community services, small commercial stations and new entrants
- Achieving the above with a sustainable, long-term business plan

Whilst the greater proportion of residents are within the city boundaries, the Plymouth polygon extends into a parts of South East Cornwall, West Devon and the South Hams. Our plan provides excellent coverage across the most densely populated areas of the polygon, particularly those parts that will be served by no other multiplex.

The rural nature of much of the poylgon's hinterland, combined with the low-lying coastal city, makes serving the entire area from a small number of transmitters extremely difficult. As we are concerned to establish a sustainable multiplex which is affordable to community stations, small commercial services and new entrants, we have avoided the temptation to install an unaffordable number of transmitters which would add to both capital and operational costs, or the use of the national infrastructure providers, which come at high rents that puts sustainability at risk.

In choosing our transmitter locations, we have noted Ofcom's concerns about potential outgoing interference from the Arqiva/Cellnex sites at Caradon Hill and North Hessary Tor. Moreover, these facilities also come at both high fixed and variable costs, which we believe would make the multiplex unsustainable.

Therefore, after careful consideration of many potential locations throughout the polygon based on our group's extensive local knowledge, we have opted for a two-site single frequency network, using locations we can access at modest cost.

As the south west's largest city, a robust DAB signal across Plymouth is paramount to the success and quality of our multiplex. We have achieved this through a transmitter in the South Hams on high ground overlooking the city at Staddon Heights.

As well as Plymouth itself, we have endeavoured to provide a very good level of coverage in areas which fall in no other polygon, which mainly means providing strong coverage to the Cornish towns of Saltash and Torpoint, the Rame Peninsular, and West Devon settlements to the south of Dartmoor. This is achieved largely through a transmitter at a school in St. Budeaux, near the Devon border with Cornwall. The Marine Academy Plymouth is part of the Ted Wragg Trust, with which the participants already have a productive relationship, and which provides a transmitter location in the Exeter polygon.

2.2 Please provide summary details of the sites required to achieve this coverage by completing the table below (add additional rows as required):

Site name	NGR	Antenna ht (m agl)	Antenna type & bearing	New/existing antenna	ERP (W)
Marine Academy	SX45485854	15m	OMNI - Colinear	New	50w
Staddon Heights (Hover Com)	SX49605191	8m	OMNI - Colinear	New	200w

2.3 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 dBµV/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 full coverage prediction map for the whole of the transmitter network is included in the Appendix G. It shows the 63 dB $\mu$ V/m field strength (as well as the 54 dB $\mu$ V/m and 38dB $\mu$ V/m contours).

The ward-level population tables (2011 Census) indicate that at 63 dBµV/m field strength;

- the number of people falling outside the Plymouth polygon does not exceed 30% of the total population within the advertised licence area; and
- the proposed coverage does not overlap more than 40% of the population within the relevant local radio multiplex service's licensed area.

The transmitter network has been designed to minimise any significant interference above 38 dB $\mu$ V/m to other proposed small-scale DAB licence areas.

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

Provide the name and version of the prediction tool used.	ATDI HTZ Communications v22 6.9 x64
Detail the terrain model used by the software and its resolution.	DTM: Ordnance Survey terrain data – 50 metre resolution (DSM+DTM)
Detail the ground cover (clutter) data used by the software and its resolu- tion.	Infoterra clutter data to 50m resolution
What propagation algorithm has been used?	Model pre-set – Fresnel • Diffraction geometry – Deygout 94-2 • Subpath attenuation – coarse integration • FZ fraction 0.8 • Earth radius (sea and land) - 8,500km
Where multiple sites are proposed, describe what methodology has been used to assess the network (SFN) gain	Power sum
If these predictions have not used Ofcom-provided population data, state what population data has been used and its source.	Ofcom-provided population data has been used along with that from the 2011 Census which is included within ATDI's modelling software
Have your predictions been generated by a commercial organisation? If so, by whom?	Coverage predictions have been generated by Viamux using HTZ Communications software from ADTI.

# 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):

PlymDab Ltd

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

14246959

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:

c/o Hospital Radio Plymouth Bircham House William Prance Road Plymouth PL6 5WR

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

Yes.

## Ownership and control of company which will hold the licence

#### **Details of officers**

3.5 Please complete the following table, expanding it if necessary, to provide the following details for each director or designated member of the applicant (i.e. the body corporate that will hold the licence):

Full name of individual	Correspondence address <sup>1</sup>	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Paul Nero	Radio Exe, 1 Oak Tree Place, Manaton Close, Exeter, EX2 8WA	UK	Director: Exe Broadcasting Limited; Radio Exe Ltd; Exe Communicate Limited: Plain Text Limited; 35/37 Hamilton Road Management Company (2002) Limited; Beehive Cranford Management Company Limited: Exeter Chamber of Commerce (1992) Limited;	Managing Director, Radio Exe

<sup>&</sup>lt;sup>1</sup> This should be the same address as is held and published by Companies House.

Richard Hargrave	Hospital Radio Plymouth, Bircham House, William Prance Road, Plymouth, PL6 5WR	UK	Hargrave Media Ltd	Consultant, Hargrave Media Ltd
Patricia Jane Duff	c/o Fuel Accountancy Services, 66 Faraday Mill Business Park, Cattewater Road, Plymouth, PL4 OST	UK	Market2Media Ltd,	Consultant, Market2Media Ltd

#### **Details of participants**

3.6 Please complete the table overleaf, expanding it if necessary, to list all bodies or individuals which hold or are beneficially entitled to shares, or who possess voting powers, in the applicant (i.e. the "participants"). 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.

(If parts of this question are not applicable to the applicant – for example, because the applicant does not have shareholders – please respond "N/A" in the relevant parts of the table.)

Full name of participant (existing and proposed)	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Exe Communicate Ltd	52	52	52	52
Clear Sky Publishing Ltd	20	20	20	20
Exeter Community Radio Ltd	10	10	10	10
Hospital Radio Plymouth	10	10	10	10
Westward Media Ltd	8	8	8	8
Comments				

## **Details of relationships of control**

3.7 Complete the following table, expanding it if necessary, to list any bodies corporate which are controlled *by* the applicant, any director of the applicant, any person/body corporate with control over the applicant, or any body corporate controlled by a person/body corporate controlling the applicant. Please include bodies corporate under joint control – i.e. which are controlled acting together in concert with third parties (e.g. because of a shareholder's agreement):

(If this question is not applicable to the applicant please respond "N/A" in the table.)

Full name of body corporate	Address	Person/body controlling the entity (i.e. the applicant itself or its associate)
Devon20Twenty (Plymouth) Ltd	C/O Hospital Radio Plymouth, Bircham House, William Prance Road, Plymouth, PL6 5WR	PlymDab Ltd

#### Details of persons who control the applicant

3.8 Complete the table overleaf, expanding it if necessary, to list all persons/bodies corporate who control the applicant, or control any person/body corporate with control over the applicant. Please include persons or bodies that control the applicant (or body corporate with control over the applicant) jointly i.e. acting together in concert with third parties (e.g. because of a shareholder's agreement). Please note that some of this information may repeat information provided above on shareholders and other participants in the applicant:

Full name of person/body corporate	Address	Person/body controlled by the entity (i.e. the applicant itself or its associate)
Exe Communicate Ltd	1 Oak Tree Place, Manaton Close, Exeter, EX2 8WA	PlymDAB Ltd

(If this question is not applicable to the applicant please respond "N/A" in the table.)

3.9 Complete the following table, expanding it if necessary, to list other bodies in which any individual listed in response to question 3.8 is a director or designated member:

Full name of individual	Name of body in which individual is a director or designated member
N/A	N/A

3.10 Complete the following table, expanding it if necessary, to list all bodies corporate which are controlled (including jointly controlled) by any body corporate listed in response to question 3.8:

Full name of body corporate listed in 3.8	Body corporate controlled
Exe Communicate Ltd	NONE

3.11 In relation to each body corporate identified in response to question 3.8, complete the table overleaf, expanding it if necessary, to list all bodies which hold or are beneficially entitled to shares, or who possess voting powers, in the body corporate concerned (i.e. "participants"). You may, but are not required to, exclude from this table any bodies listed in response to question 3.8. 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 Q3.8	Exe Comn	nunicate Ltd		
Full name of participant	No. of shares	Total investment (£s)	Total investment (%)	% of voting rights
Paul Nero	100	£100	100%	100%
Comments				

## Involvement of the applicant in specified activities

3.12 Please state below whether the applicant, or any individual or body corporate identified in questions 3.5 to 3.11 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; <sup>2</sup>	No	N/A
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

- 3.13 Please answer 'yes' or 'no' to the following questions about the applicant (i.e. the body corporate that will hold the licence):
  - a) Is the applicant a current licensee of Ofcom?

**No** .

b) Has the applicant ever held an Ofcom broadcasting licence before?

No.

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

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

#### Yes.

d) Does the applicant control an existing Ofcom licensee?

#### No.

e) 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.

f) Has the applicant – or any person(s) controlling 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.

g) Has the applicant – or any person(s) controlling 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.

 h) Is the applicant – or any person(s) controlling 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.

 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.

3.14 If the response to any of the questions (a) to (i) in 3.13 above is 'yes', please provide the details, expanding the table where necessary:

	Licence number(s) (if known)	Details
(c)	AL000318BA/3	Radio Exe
(c)	DP101968BA/1	Radio Exe DAB
(c)	CR000118BA/2	Exeter Community Radio Ltd
(c)	LRSL104728	Hospital Radio Plymouth
(c)	DP101895	Westward Media Ltd
(c)	DS103895	ExeDab Ltd

3.15 Please provide any further information you hold, relating to the past conduct of the applicant or those individuals listed, in regulatory matters or in matters going to honesty and/or compliance, which may be relevant to Ofcom's consideration of whether or not the applicant is fit and proper to hold a broadcast licence. If the applicant or the form signatory fails without reasonable excuse at this point to declare any matter of which Ofcom subsequently becomes aware, and which we consider to be relevant to the applicant's eligibility to hold a licence, we will take it into account in determining the question of whether the applicant/licensee remains fit and proper to hold a licence.

N/A

3.16 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	N/A	N/A

# Financial and business plan

3.17 Please provide a high-level estimate of the costs you believe will be required to establish the multiplex service.

A detailed financial forecast that sets out establishment costs, annual income & outgoings with 36-month cash flow and profit & loss forecasts is included in Appendix A. This has a contingency for inflation reaching 15% built into the figures. The financial structure ensures we are not over-capitalised and that the amount of funding invested in the multiplex is not significantly higher than the real value of our assets, that it represents a fair return on capital employed, and it avoids a situation where capital is either idle or invested in assets that are not fully utilised.

#### Capital Investment – £45,000

The main capital investment is the multiplexing & transmission system. In selecting Viamux to provide the small-scale DAB solution as well as professional services (project management, site surveys, network design and build, software configuration, installation, training and ongoing support) we were mindful of their wealth of experience implementing DAB systems, the competitive pricing of their solution and the many customer references they have in the UK.

#### Operating Costs – £17,000 (per annum)

#### **Transmission**

The ongoing costs associated with transmission (site rental, electrical power consumption, internet provision) are the single most important recurring operating expenditure for a multiplex company. Our choice of transmission sites is a cost-effective choice that balances delivering the largest audience whilst ensuring carriage fees remain attractive to service providers.

#### Technical Support & Maintenance

Ongoing technical support for maintaining the multiplex and transmission equipment will be provided by Viamux (by way of an annual support & maintenance contract).

#### Small-Scale DAB Management Software

We will subscribe to Optimux - the low-cost cloud-based control panel that simplifies management and monitoring of a small-scale DAB network. For a low-cost monthly fee, Optimux allows us to implement cloud encoding - making it quick, easy and cheap to add new services to a multiplex. It also provides us with full invoicing and direct debit collection to streamline the payment of carriage fees. Optimux also monitors the multiplex and will alert us to any issues and notify service providers regarding their audio.

#### **Administration**

The usual administration costs associated with operating a business of this size are included (insurance, legal and accountancy services) as is the annual Ofcom licence fee.

#### Funding

The project is funded through a combination of equity and a shareholder working capital loan. The multiplex operation will be established and sustained by providing existing community and commercial broadcasters, as well as new entrants, with a reliable digital broadcast platform on both affordable and flexible terms.

- 3.18 Please indicate how the costs outlined in 3.17 (above) will be met, under the following headings:
  - a) Share capital

We have capitalized with 100 Ordinary shares at £1 each.

b) Loan stock

£44,900 will be injected as loan stock, at zero interest, with a repayment plan beginning in month 19 after launch

c) Leasing/HP facilities (capital value)

There is no requirement for Leasing/HP facilities.

d) Bank overdraft

There is no requirement for a Bank overdraft.

e) Grants and donations

There is no requirement for grants or donations.

f) Other (please specify)

#### None

3.19 Expanding the table if necessary, please list the providers of the funding which will be used to establish the service, and the amount of funding that each will provide. For incorporated investing shareholders, please provide a copy of the most recent statutory accounts if they are not currently available on Companies House.

Name of shareholder or investor	Percentage of shares held (if applicable)	Amount of funding provided (£)
Exe Communicate Ltd	52	£23,400
Clear Sky Publishing Ltd	20	£9,000
Hospital Radio Plymouth	10	£4,500
Exeter Community Radio Ltd	10	£4,500
Westward Media Ltd	8	£3,600

3.20 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.

All funding is confirmed

## **Relevant expertise and experience**

3.21 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.)

#### **General Management**

Post award, we will take responsibility for the day-to-day general management of the multiplex operation - managing commercial, financial and operational matters. This is simplified through the use of Optimux and with the ongoing support of Viamux..

Tasks include, but are not limited to:

- Recruiting new services
- Issuing carriage agreements
- Invoice management
- Payment collection
- Working with programme services to ensure DSPS and regulatory licence compliance
- Monitoring and Ofcom reporting

We will also be responsible for ongoing; accounts, IT, admin, legal, customer service and technical support.

#### Team

The participants share a track record of successfully establishing and operating broadcasting operations.

#### **Experienced management**

Tricia Duff, our chair, is former managing director of Radio Plymouth, the commercial station that broadcast to the city for 10 years until 2020, when it was acquired by Bauer. Formerly with Global and, before that with local newspapers, Tricia has worked in media sales for more than 30 years, half of that in radio. Born, bred and having always lived in Plymouth, she brings a thorough knowledge of the media landscape in Devon and Cornwall and is a consultant to Devon's commercial station Radio Exe.

**Paul Nero,** managing director of Radio Exe, has brought the Exeter multiplex licence to launch, in challenging circumstances through the covid period and the subsequent economic crisis. Paul will have overall responsibility for launching and managing the Plymouth multiplex, in the city in which he was a senior manager at former ITV company TSW. Paul, who has home in the polygon, has editorial responsibility for the BBC's local democracy reporting service in Devon. He is managing director and controlling shareholder in Exe Broadcasting, the company that runs Radio Exe, which broadcasts across Devon and East Cornwall, including the whole of the Plymouth polygon. Consequently he is well-connected with businesses, councils and audiences in this thriving city and its hinterland.

An author of five books, he is a director of Exeter Chamber of Commerce, and helps lead the south west branch of the Radio Academy, as well as being a member of the British Academy of Film and Television Arts (Bafta). He began his MBA at the University of Plymouth, before completing it at Bristol Business School.

**Richard Hargrave runs** his own technical consultancy business, Hargrave Media Ltd and is the station engineer for Hospital Radio Plymouth, Cross Rhythms and Gateway Radio.

Richard has been involved in broadcast media for more than 30 years. His background as an electrician has given him a firm foundation in engineering and he has been instrumental in the design and operation of both radio and television studios. His current work as a broadcast engineer for a global television network has kept him at the forefront of broadcast media as it faces ever-changing technologies. Richard has vast experience in the latest radio automation and digital studios that are in use with today's broadcasters. His fast-thinking and logical approach will be an asset to PlymDab as we bring stations to air.

#### **Technical Partners**

The PlymDab team will be supported by Niocast Digital, which is also the technology partner of ExeDab in the Exeter polygon. Niocast Digital's services will include supporting, maintaining and upgrading the multiplex hardware and software; recruiting new services to ensure that the multiplex is always full; negotiating carriage agreements; invoice management and payment collection; and working with programme services to ensure DSPS and regulatory licence compliance.

PlymDab will operate using Optimux, a software platform specifically developed to simplify day-to-day management of small-scale DAB multiplexes. It employs an easy-to-use dashboard for managing, monitoring and reporting on all aspects of their multiplex as well as providing invoicing and direct debit collection to simplify the payment of carriage fees. Every aspect of the day-to-day management of a small-scale multiplex has been incorporated into Optimux.

3.22 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	Viamux Ltd	the small-scale DAB solution specialists	
Ongoing maintenance of the transmission equipment	Viamux Ltd	Viamux is a leading supplier of small-scale DAB solutions in the UK & Republic of Ireland.	
Installation of the Multiplexing equipment	Viamux Ltd	Established in 2017, Viamux specialises in Ofcom licence applications and coverage predictions as well as designing, building,	
Day-to-day technical management and maintenance of the multiplexing equipment (if different from response to question 3.28 above)	Viamux Ltd	<ul> <li>installing, operating and maintaining small- scale radio multiplexes with clients in:</li> <li>Manchester,</li> <li>Edinburgh,</li> <li>Blackpool,</li> <li>Cardiff,</li> <li>Newcastle &amp; Gateshead,</li> <li>Derry/London Derry,</li> <li>Exeter,</li> <li>Preston,</li> <li>Warrington, Widnes &amp; Runcorn,</li> <li>Cheshire East</li> <li>Cheshire Mid</li> <li>Nottingham</li> </ul> More info: www.viamux.com	

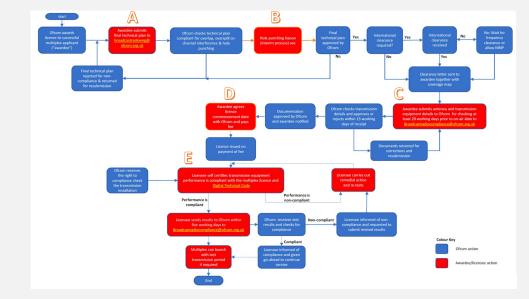
# Timetable for coverage roll-out

3.23 Please tell us how soon after licence award you expect your multiplex service to become operational and achieve the coverage you are proposing:

Our aim is to launch the multiplex within 6 months of the licence award subject to Ofcom approval of our final technical plan.

Funding is already in place and Heads-of-Terms are sufficient to exceed the operating costs of the multiplex. We are continuing to actively pursue all expressions of interest and are confident to launch with a strong line-up of services.

Following the 'Guide to Launching' flowchart and the procedures set out in Ofcom's Technical Policy Guidance we aim to accelerate the implementation timetable by focusing on stages A to E.



#### Stages:

- A. In response to any technical mitigations in the award letter, we aim to finalise our site agreements and technical plan and submit to Ofcom within 4 weeks.
- B. On receipt of the hole punching document we will liaise with the national & local multiplex operators immediately. Responses received will be sent to Ofcom.
- C. Once the technical plan is signed off by Ofcom the equipment will be ordered and specifications shared with Ofcom. Installation date is scheduled and Ofcom is notified with twenty days' notice.
- D. Equipment is installed and commissioned.

As a leading small-scale DAB provider, Viamux will manage the implementation of the project. Availability of all equipment, software and professional services to meet our timescales are already confirmed.

We will be responsible for finalising site agreements and arranging broadband connectivity. A project GANTT chart (Appendix E) details the tasks, activities and timescales under which the implementation will be governed to achieve our target launch date.

3.24 In addition, please provide, as an annex to be submitted with this application, 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.

The project GANTT chart (Appendix E) sets out the precise, key stages in the implementation of the multiplex together with the timeline.

# 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?Yes.
- 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. Devon20Twenty Plymouth will be a rolling news and information station for Plymouth and the surrounding area, with everything people need to know in 20 minutes, every 20 minutes.

Overseen by professional management, but run by volunteers, and aiming to train people to level 3 in journalism (and some level 5s in broadcast journalism), a C-DSP application for this station is in preparation and will be submitted shortly.

A project exploring the community benefits and volunteering opportunities of such a station has been already undertaken with the help of interns from the University of Exeter.

An application for a C-DSP licence for this station is to be submitted once CIC registration is complete.

Additionally, a participant in the group, Hospital Radio Plymouth, presently on FM around Derriford Hospital, will extend its coverage so it can serve families and friends of patients, as well as hospital staff, through carriage on PlymDab.

We have also signed heads of terms or expressions of interest with four other community stations, bringing our proposed initial community line-up to six services, which will deliver a wide range of output to specific audiences:

- A rolling news service dedicated to Plymouth
- A hospital radio service
- A student radio service
- A Christian radio station
- A station for the area's young people
- A general community station

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. In this context, a "participant" refers to a person who holds or is beneficially entitled to shares in the applicant or possesses voting power in the applicant. If the service is already licensed by Ofcom, the licence number should be provided. Please refer to the nature of the participation (e.g. shareholding or agreement in relation to voting power):

N/A

## Demand or support from programme providers

4.4 Please provide in the table below (expanding the table if necessary) the names of providers (or prospective providers) of community or local digital sound programme services who have expressed their demand or support for the provision of the proposed multiplex service in the area to be served by the multiplex service. For reasons of transparency, the response to this question *must be answered below and should not be provided as a separate annex*. The evidence of the demand or support, such as signed heads of terms or emails, should be provided as a confidential annex, and relate only to the specific multiplex being applied for.

Name of service provider and station name (if known)	Proposed C- DSP or DSP	Nature of evidence of support provided
Devon20Twenty Plymouth	C-DSP	PlymDab's own station, with signed head of terms
Hospital Radio Plymouth	C-DSP	Participant in PlymDab, with signed heads of terms
The Workshop (Plymouth Marjon University student radio)	C-DSP	Expression of interest
Cross Rhythms	C-DSP	Expression of interest
Gateway Radio	C-DSP	Signed heads of terms
Ocean City Radio	C-DSP	Signed heads of terms
Phonic FM	DSP	Participant in PlymDab, with signed heads of terms
Property Radio	DSP	Participant in PlymDab, with signed heads of terms
Devon Diamond Radio	DSP	Signed heads of terms
Flashback	DSP	Signed heads of terms
Ignite 90s	DSP	Signed heads of terms
Pop Up Plymouth	DSP	Indirect participant in PlymDab, with signed heads of terms
Radio Exe Devon	DSP	Indirect participant in PlymDab, with signed heads of terms
Radio Exe Plymouth	DSP	Indirect participant in PlymDab, with signed heads of terms
Rewind	DSP	Expression of interest
South Devon Radio	DSP	Signed heads of terms
The Voice	DSP	Signed heads of terms
Zest 60s	DSP	Signed heads of terms
Confidential station A	DSP	Signed heads of terms

# 5. Fair and effective competition

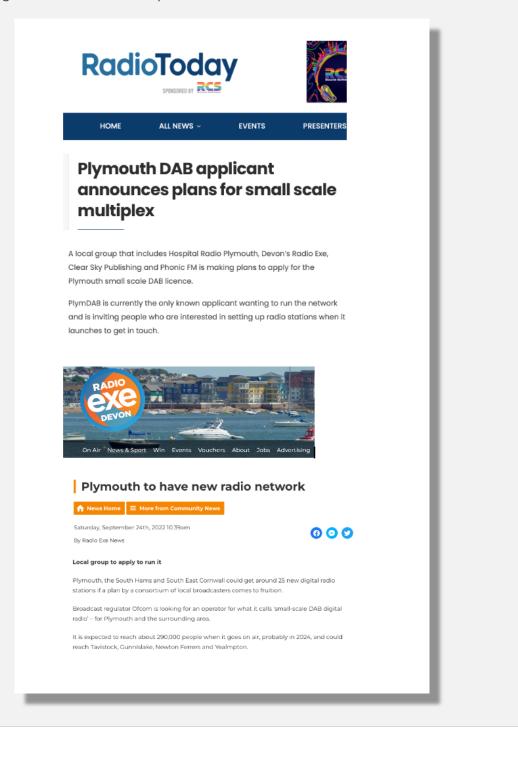
5.1 Please detail the measures that have already been taken, and will be taken before and during the licence period, to demonstrate that, in contracting or offering to contract with programme services providers, the applicant has acted in a manner calculated to ensure fair and effective competition in the provision of such services.

We have promoted our proposed service publicly in the polygon and with the wider industry, and also by targeted calls and emails. Our pre-application activities included:

**Online promotion:** We launched our website <u>www.plymdab.com</u> early in the application process to provide information about the project and the opportunities for prospective service providers. The website contained a form for stations to make expressions of interest.

Plymouth's Small-Scale DAB Multiplex Plymouth's Small-Scale DAB Multiplex ew digital radio stations for Plymouth Coverage Area The Partners Clear Sky Publishing **Hospital Radio Plymouth** HOSPITAL Phonic FM nonic fm Exe Broadcasting Westward Media

**Media coverage**: Our press release announcing our intention to apply to run the Plymouth multiplex was picked up by local and industry press, further directing people to the PlymDab website. Social media coverage also resulted from this press announcement.



**Outreach**: Our participants are well-connected in the media sector in Devon and Cornwall and identified potential services that may be interested in carriage. We made calls and sent emails to invite them to join our line-up.

Shortly after the publication of Ofcom's advertisement, we invited community stations to an initial kick-off meeting at a city centre hotel to explain the opportunity and invite them to participate or to join the line-up.

We met with Plymouth Marjon University's media lead, who has agreed to carry the student station, liaise with the city's other universities and colleges, and for the students to be key volunteers in our own C-DSP station Devon20Twenty Plymouth. Jointly with one of our participants, we took a stand at the Devon Business Show to explain the benefits of the service to attendees. We produced a flyer, shown below, to distribute in community venues.



25

#### Approaching a wide range of prospective service providers:

We have proactively contacted known existing service providers in the south west, including online stations that may wish to make the switch to DAB in Plymouth and the surrounding area.

We made contact by email and phone to ensure that radio operators in the area were aware of our plans. Commercial, community, hospital and student radio stations were all approached.

We outlined our draft transmission plans, as far as practicable whilst negotiations were ongoing with landowners, as well as headline terms of agreement and indicative carriage fees, including a commitment to offer DAB carriage at a negligible rate for C-DSP licence holders.

Through our participant Exe Communicate, which indirectly is involved in Devon roundone multiplex ExeDab, we are aware that expressions of interest do not necessarily turn into firm commitments to broadcast. Although the Plymouth polygon covers more than twice the number of residents than Exeter, we are proceeding with caution to ensure that our financial plan is sustainable should expressions of interest not proceed to final contracts.

#### Acting in a manner calculated to ensure fair and effective competition

PlymDab will always act in a manner that ensures fair and effective competition. Our negotiations with potential service providers are, and will continue to be, demonstrably fair and non-discriminatory.

We will continue to seek additional service providers and will be delighted to welcome any organisations that have hitherto given exclusive support to any rival group. In the interest of fair and open competition, we have not asked any potential service provider for exclusivity in the application process.

Following the launch of the multiplex, we will continue to operate a transparent rate card policy, published on our website. The structure of our rate-card will reflect our core aim of supporting and encouraging community broadcasting by C-DSP licensed services with pricing to help them establish a long-lasting partnership with us for mutual sustainability.

Because we have more expressions of interest for C-DSP slots than reserved carriage space, we will publish a protocol for selecting which stations may use these slots if demand outstrips supply.

# 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:
  - 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;
  - 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:

PATRICIA DUFF

Date of application:

14 OCTOBER 2022

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

Company director.