

Question	Your response
<p><b>Question 1: Should Ofcom exercise its discretion to consent to the application to vary the Bradford small-scale multiplex licensed area, with regard to the statutory and policy considerations set out in this document?</b></p>	<p>We support Ofcom’s view that it should vary the Bradford small scale multiplex licensed area.</p> <p>Small Scale DAB operates on a very different economic model to existing local and national DAB infrastructure, and that model is still evolving as multiplex operators gain experience from operating their licences. Reasonable flexibility is required to allow operators to adjust their costs to make their licences sustainable. Often accepting shorter lease terms can dramatically improve the ability of the licensee to secure affordable sites. Whilst a change in the technical plan will cause a change to the achieved coverage, the licensee's incentive will be to maximise coverage efficiency alongside sustainability, subject to remaining broadly within the coverage definition of the originally licensed multiplex area.</p> <p>Section 7.10 of the Small-scale radio multiplex licences Guidance notes suggests that any reduction in covered population triggers a full consultation. We would like to raise the question of whether a less onerous process might be feasible if the impact of coverage loss fell below a percentage threshold.</p>
<p><b>Question 2: With reference to our impact assessment, do you agree with our assessment of the potential impacts of approving this application?</b></p>	<p>We do not have any comments on the specific impacts of this proposed change.</p>