

Title:

Mr

Forename:

Daniel

Surname:

Nathan

Representing:

Organisation

Organisation (if applicable):

Juice 107.2 (Brighton and Hove Radio Ltd)

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Do you agree that we have identified the objectives which the small scale DAB multiplex trial should seek to achieve?:

The small scale DAB multiplex trial is a welcome opportunity for smaller commercial and community radio stations to innovate and work collaboratively to develop a cost effective DAB component to broadcast distribution, but it would be a lost opportunity to limit this trial to just three multiplex areas. With Government funding of up to £500,000 available to fund the initiative, it is also understood that some prospective participants would be prepared to underwrite the limited cost of their own multiplex installation allowing sufficient resource for Ofcom to assess a more meaningful sample than the proposed three scenarios. Just three tests are most unlikely to provide Ofcom with the robust data to allow it to make an evidence-based decision about the future of small scale DAB.

Question 2: Are there any other questions or issues which the small scale DAB multiplex trial should seek to address?:

The consultation document acknowledges that the small scale multiplex trial is intended to spur innovation in licencing, regulation and business practices as well as the testing of a nascent technology. Gauging the success (and failure) in which participants present their multiplex consortia is a potentially useful exercise for Ofcom. The technology is clearly not the only challenge presented by such a trial and it will surely be helpful for Ofcom to allow participants to experiment with the ownership and organisation of these new multiplexes - in contrast with the monopolistic gatekeeper approach taken by incumbent regional operators.

Question 3: Do you agree with our proposed technical licence conditions?:

The consultation document presents three approaches to the technical operation of a small scale DAB multiplex in clear terms - and while it certainly the case that Ofcom is best placed to understand coverage planning issues, it ought to be left open to a trial multiplex operator to deploy or to eschew the suggested SDR approach with or without Ofcom loaned equipment, in favour of a more traditional broadcast solution.

Also, on the basis that it is possible that the trials may be extended, the proposed use of 11A has been questioned by some in the radio engineering community. It would surely be more sensible to use longer term alternative frequencies including Inter-leaved spectrum if available in specific trial areas.

Question 4: Do you agree with our approach to non-technical licence conditions and requirements?:

In the event that a trial multiplex succeeds in generating a viable audience for existing and new entrant services, there ought to be no reason to end such a trial after a nine month period, particularly if it demonstrates the potential to be self supporting at the conclusion of DCMS funding in March 2016.

Question 5: Do you agree with our proposed approach to awarding trial licences?:

After my involvement with the original 'Brighton' trial, I would like to reaffirm my interest in taking part in this next stage. I can confirm that there are at least six full time radio services able to take part in a jointly owned multiplex venture which would be established as a Not for Profit Company. These include:

- Juice 107.2, local commercial radio for Brighton
- Radio Reverb 97.2, community radio for Brighton
- Smile Sussex, an easy listening DAB station in Sussex
- totallyradio.com, a specialist music internet radio station established in 2000
- University Radio Falmer at the University of Sussex, one of the UK's longest established Student radio stations working alongside student colleagues from the University of Brighton's Student Union
- Resonance 104.4, pioneering arts and free form radio station in London, many of whose staff and contributors are Brighton based

There is an active community of RF and digital radio engineers in Brighton, some of whom were involved in supporting the original trial and who are naturally keen to build on that experience. The Juice 107.2 fm transmitter mast used for the Brighton test remains available as a main transmitter site for the trial multiplex in the centre of the city with a second site available for an on channel repeater to serve East Brighton. Finally, there is leased line connectivity at the both the Juice 107.2 studio and main transmitter sites as well as a direct line of site between the two.

In the longer term, I suggest that the most appropriate method of award for the multiplex licence should be by "beauty contest" with the stipulation that any company can only hold a controlling interest in a single multiplex licence, but with minority interests still permitted - in much the same way as existing community radio licencing. In the event that the trial is extended, taking this approach would require only minor alteration to the existing Broadcasting Act (1996) and could be interpreted by Ofcom to prioritise both local multiplex ownership and the carriage of genuinely local services.

Question 6: Do you agree with our proposals set out in this section in relation to final reporting obligations, the recovery of the equipment and the extension of trial licence duration?:

The suggestion that the trial period might be extended at least until the point at which a permanent Small Scale Licencing Framework is in place has a precedent in the earlier community radio trial and should encourage wider participation in the Small Scale DAB multiplex trial.