

Your response

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About Arqiva:

Arqiva is a leading UK communications service and infrastructure provider, operating at the heart of the UK broadcast industry. Our broadcast transmission network spans over 1,450 sites and delivers universal broadcast television, also known as Digital Terrestrial Television (DTT), and radio services to over 98.5% of the UK, ensuring universal availability of a wide range of free-to-air services.

Arqiva holds two of the three national commercial DTT multiplex licences, operates two national commercial digital radio multiplexes, and holds multiple DAB local radio multiplex licences.

Arqiva also operates over 80 ground satellite dishes for Direct-to-Home (DTH) TV and is the UK's largest independent reseller of satellite capacity, with a growing market share in Low Earth Orbit (LEO) up-linking.

We are dedicated to supporting and advancing the UK's broadcast industry, ensuring that our customers can deliver their content to audiences wherever they are and however they choose to watch or listen – with services meeting the highest standards for reliability, security, and user experience.

Response:

Arqiva welcomes the opportunity to respond to Ofcom's consultation on its proposed strategic approach to broadcast radio licensing. We recognise the rationale for setting clear short-to-medium-term priorities as the Small-Scale DAB (SSDAB) licensing programme concludes, and we broadly support the objective of ensuring that finite spectrum and regulatory resource are directed towards areas of greatest benefit for audiences and citizens.

However, we would like to raise two areas where further clarity and refinement would be beneficial to ensure the framework remains predictable, proportionate, and supportive of continued investment in digital radio infrastructure.

1. Application of the 40% overlap threshold

We note Ofcom's proposal to move from a strict application of the 40% overlap threshold to a more flexible, case-by-case approach, whereby a presumption against greater overlap may be rebutted in "exceptional circumstances" where there are significant public benefit and only minimal exceedance.

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While we recognise the intent to avoid perverse outcomes - particularly where modest increases in overlap could unlock meaningful coverage improvements - we have some concerns regarding the introduction of a more subjective test.

The original 40% threshold was developed following careful consultation and provided clarity and regulatory certainty to stakeholders. Moving to a more discretionary framework risks creating ambiguity around decision-making criteria and could, over time, lead to incremental “creep” beyond the intended limits. Ofcom must also ensure that its approach on further SSDAB does not conflict with any options likely to be considered as part of the DCMS Radio Review.

We therefore recommend that Ofcom:

- sets out clear, objective criteria for what constitutes “exceptional circumstances” and “significant public benefit”;
- defines what is meant by “minimal exceedance” (e.g. through indicative thresholds or tolerances);
- commits to transparent reporting of decisions taken under this flexibility to ensure consistency and confidence in the regime; and,
- takes into consideration potential issues or scenarios which might be considered as part of the current DCMS Radio Review.

2. Treatment of DAB (national and local) coverage improvements

We also note that the proposed priorities explicitly reference coverage improvements and extensions for SSDAB and renewals, extensions, and technical changes for analogue services. However, there is no explicit reference to coverage improvements or extensions for national and local DAB multiplexes.

Our reading is that such activity may be implicitly captured under “continuing to provide ongoing support for incumbent licensed services”. However, the absence of an explicit reference creates some uncertainty - particularly given that other licence types (notably analogue) are specifically called out.

This is important because we expect continued investment in, and demand for, national and local DAB coverage enhancements over the coming years, including modifications to improve resilience, reach, and in-car listening continuity.

We also anticipate changes in DAB coverage will be considered as part of the DCMS Radio Review which is currently underway. It is important that Ofcom’s approach on this is joined up with and considers any changes which might be under evaluation within this process.

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We would therefore welcome clarification from Ofcom that:

- applications relating to national and local DAB coverage improvements and extensions will continue to be supported and prioritised where appropriate;
- such activity sits clearly within the scope of ongoing support for incumbent licensed services; and,
- Ofcom considers the DCMS Radio Review and ensures that it does not close off any potential options around DAB coverage which might be discussed as part of that review.

In addition, we support Ofcom's proposal to consider further local DAB multiplex licences where there is clear demand and spectrum availability and would welcome further detail on how Ofcom intends to assess "obvious demand" and prioritise such opportunities in practice.

3. Overall approach and framework stability

Finally, while we recognise that this consultation is focused on the short-to-medium-term licensing workplan - as distinct from the ongoing DCMS Radio Review - it is important that the framework continues to support incremental network development across all digital platforms.

In particular, where Ofcom has stated that resources will be channelled towards coverage improvements and extensions, we believe it is important that the underlying policy framework remains stable and predictable. The original parameters, including the 40% threshold, were carefully calibrated, and we are keen to ensure that any evolution of the framework does not inadvertently introduce uncertainty or reduce confidence in long-term infrastructure investment.

Arqiva would be happy to engage further with Ofcom on these points and provide additional evidence on anticipated demand for DAB coverage enhancements and their benefits for audiences.

Please complete this form in full and return to broadcast.licensing@ofcom.org.uk.