

Your response

Question	Your response
Question 1: Do you agree with the proposed broadcast licensing priorities for the short to medium term? Please give reasons for your answer.	Confidential? –Y/ N Bauer Media Audio UK broadly agrees with Ofcom’s proposed priorities and welcomes the clarity they provide around focusing new opportunities on SSDAB and community FM, while not offering new local commercial FM licences. This approach reflects market reality – there is no practical scope for additional commercial FM – and supports the continued shift of mainstream commercial listening to DAB/DAB+ and IP, which aligns with our investment plans for 16 Bauer multiplexes and the Hits / Greatest Hits Radio network. Our main caveat is that, within this framework, Ofcom must explicitly safeguard the sustainability of existing commercial multiplexes and services by avoiding over-supply of overlapping SSDAB capacity in core Bauer markets. See Q3.
Question 2: Do you consider that the proposed broadcast licensing priorities for the short to medium term will provide sufficient provision for audiences? Please give reasons for your answer.	Confidential? –Y / N Yes, we consider that Ofcom’s proposed priorities should provide sufficient and diverse provision for audiences, combining: Established national, regional and local commercial services on FM/DAB. Growth in SSDAB and community noting that to enhance plurality and hyper-local content. However, “sufficient provision” also depends on the financial health of the core commercial layer. If SSDAB and community expansion are not carefully balanced, there is a risk of undermining the multiplex economics that fund the large-scale content, news and emergency coverage listeners rely on. We therefore support the priorities in principle, provided Ofcom continues to assess cumulative impact on existing local/regional multiplexes and does not treat additional SSDAB as cost-free from a market-sustainability perspective.

Question	Your response
Question 3: For post-launch SSDAB multiplex coverage improvement or extension requests only, do you agree with our proposed change in approach to our application of the rule which restricts overlap with local muxes to 40% of the population already covered by the local mux (the “40% ceiling”)? Please give reasons for your answer.	Confidential? —Y / N Our strong preference is that Ofcom: Retains the 40% threshold as the default planning guard-rail. Only approves material exceedances following a clear, transparent assessment of listener benefit versus potential audience and revenue diversion from established local DAB multiplexes. In Bauer core markets, local/regional multiplexes carry the primary versions of key brands such as GHR, Hits, Heart, Capital etc. The services on these multiplexes are the only local ones required to provide local news (by virtue of simulcasting FM) as there are no local news requirements on any SSDAB services. Any relaxation of the 40% rule must be carefully targeted so that SSDAB complements, rather than damages the viability of the multiplexes carrying these local news services. The consultation Overview prioritises SSDAB and talks of advertising new small-scale multiplex areas, improving coverage of SSDAB muxes and relaxation of the rule which limits SSDAB coverage to 40% of an existing DAB multiplex. Of concern is the statement that Ofcom proposes not to prioritise work on licence types with diminishing audience, limited services and no spectrum availability... and goes on to include <i>DAB multiplexes</i> in this category. Section 3.3 of the consultation states that Ofcom has made good progress against the objectives outlined in its Plan of Work 2025/26. One of the two main planks is the licensing of SSDAB services throughout the UK. This has been achieved despite the risk to coverage of existing DAB multiplexes from adjacent-channel interference—a major concern during the expansion of the BBC National multiplex in 2009 and the ComDAB Step 1 expansion of commercial DAB in 2018. In both projects, operators were bound by the restrictions set out in the 2012 Memorandum of Understanding. The MOU resulted in Bauer Digital Radio and CE Digital being required to facilitate the installation of 20 "filler" transmitters to protect the coverage of other-user DAB

Question	Your response
	licensees. SSDAB applicants are not subject to the rigour to the extent of the MOU which DAB licensees are. The second bullet point of the Overview suggests prioritising requests to advertise further DAB licences where there is demand and available frequencies. We note that in London where there are three local DAB multiplexes (in addition to SSDAB there is a significant amount of spare capacity and there is a question as to whether these should be consolidated. We believe SSDAB adds sufficient capacity to negate the need for further standard DAB multiplexes, except perhaps in areas where there is currently no standard local DAB multiplex (e.g. the Scottish Borders)
Question 4: Do you agree with Ofcom's analysis in section 3 and at Annex A1 of the existing broadcast licence types? Please give reasons for your answer.	Confidential? – Y / N Broadly, yes – we agree that the current mix of analogue commercial, analogue community, local/regional/national DAB and SSDAB licence types provides a workable framework for the short to medium term. We particularly welcome Ofcom's recognition that: There is no realistic spectrum for new commercial FM or further national DAB multiplexes. SSDAB is primarily a community and small-scale platform, <u>not a</u> parallel route for large commercial brands in already well-served areas. Our main concern is to ensure that, in applying this framework, Ofcom does not allow SSDAB licensing and coverage creep to blur the intended distinction between small-scale and mainstream commercial tiers in key Bauer territories.
Question 5: Do you agree with our assessment on the impact of our proposed broadcast licensing priorities for the short to medium term at Annex A3? Please give reasons for your answer.	Confidential? – Y / N We agree with Ofcom's broad assessment that the impact on commercial operators is manageable and that the proposals will largely benefit audiences by maintaining existing services while enabling further local and community growth.

Question	Your response
	From Bauer's perspective, we would highlight two additional impact considerations: The potential for incremental SSDAB overlap to erode listening and revenue for existing local/regional multiplexes if not tightly controlled. The need for continued licence stability and renewal options for commercial FM – including Hits / GHR services – pending DCMS decisions on the 2030s analogue clear path, to avoid unnecessary short-term reinvestment in FM infrastructure. We would welcome Ofcom explicitly acknowledging these risks and committing to ongoing monitoring and dialogue with major multiplex operators.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – Y / N We encourage Ofcom to: Publish clear service standards and timelines for processing licence variations and DAB technical changes (power, pattern, sites), enabling multiplex operators like Bauer to plan network upgrades efficiently with transmission partners. Engage early with multiplex operators when considering new multiplex areas or SSDAB coverage expansions that materially interact with existing commercial multiplex footprints. Ensure its licensing strategy remains aligned with the forthcoming DCMS Radio Review, so decisions on FM longevity, DAB development and SSDAB growth are coherent and provide long-term certainty for investment. Consider the risks of SSDAB financial pressures driving mergers that create low-cost quasi-regional platforms, undermining commercial DAB multiplexes.

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