

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.	
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.	
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.	As a service broadcasting on several SSDAB multiplexes, Sunrise Radio broadly agrees with Ofcom’s proposal to introduce a more flexible approach to the application of the 40% overlap rule for post-launch SSDAB coverage improvement or extension requests. We recognise that a strictly rigid application of the 40% ceiling may prevent modest but meaningful coverage improvements that deliver clear public benefit, particularly in areas with fragmented DAB coverage or underserved communities. However, any flexibility should be clearly defined. We believe Ofcom should specify a maximum threshold above 40% (for example, 50% or 55%) or clearly codify the specific circumstances in which exceptions may apply. Without a defined upper limit, there is a significant risk of regulatory uncertainty and inconsistent decision-making, which could lead to a gradual erosion of the legislative intent behind the ceiling. Furthermore, an open-ended policy may encourage unrealistic applications for excessive coverage levels, resulting in waste of resources and time for both applicants and Ofcom.
Question 4: Do you agree with Ofcom’s analysis in section 3 and at Annex A1 of the existing broadcast licence types?	

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Please give reasons for your answer.	
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.	
Question 6: Do you have any other comments to make on the proposals?	No

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