

Your response

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Question 1: Do you agree with the proposed broadcast licensing priorities for the short to medium term? Please give reasons for your answer.	We broadly agree with the proposed licensing priorities set out in the consultation at section 4.12. We have been operating our SSDAB multiplex now for just over three years. In our initial application we had to make some difficult decisions on which areas within the originally advertised polygon to cover and not cover, balancing affordability with the limitations of geography, and the 40% ceiling. We would welcome the opportunity, with our neighbouring SSDAB operators in Severnside, South Gloucestershire, Bath, Weston to extend and update our coverage to be more contiguous, which is a clear benefit to listeners. We would caution that the threshold for advertising new Local DAB multiplexes should be set high. Some of the proposed criteria for determining if an additional local DAB multiplex is warranted could be manipulated by existing operators – for example by inefficient use of existing multiplex capacity with use of DAB rather than DAB+ and “service stuffing” to give the appearance of demand and scarcity. Many SSDAB multiplexes already give a quality of service very comparable to “local DAB”, and flexibility in coverage improvements would allow a group of SSDAB multiplexes to collectively offer a wider variety of services at equivalent coverage quality to meet any needs potentially identified as “Local”. In much the same way that existing “local” DAB multiplexes were afforded protection from the introduction of SSDAB licensing, it seems reasonable to expect that the impact of new “local” DAB multiplexes on existing/future SSDAB multiplexes would be considered when making decisions on when/if to advertise new “local” DAB multiplex licences.
Question 2: Do you consider that the proposed broadcast licensing priorities for the short to medium term will provide sufficient provision for audiences?	Yes As noted in the consultation document, audiences are choosing to listen to radio digitally. Whilst we recognise that this is not universally possible for all audiences, the combination of streaming (and “smart speakers”) and

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Please give reasons for your answer.	DAB offers the best combination of accessibility and variety of services for listeners in a wide variety of listening scenarios.
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.	Yes, with qualifications. The development of SSDAB in the City of Bristol was significantly impacted by the stringent application of the 40% rule. Given the population density and geography of the city, extremely small variations in coverage boundaries can cross the 40% threshold. The SSDAB coverage of Bristol proposed by ourselves and Severnside was significantly different from that originally advertised by Ofcom in an attempt to provide good quality reception in a coverage pattern that made sense locally, was affordable and within the 40% ceiling. As a result, compromises were made that affect our services and their listeners. At a high level, the legislative intent of the “40% rule” is clear. However, the practical implications of choosing to create that limitation are complex. No DAB multiplex prior to SSDAB had been planned to a population <i>limit</i>. Many assumptions exist to calculate “coverage at 63dBµV/m”. The choice of 63dBµV/m as a blanket coverage threshold is at odds with the international planning norms, which generally assume field strength of ≥ 70dBµV/m is required in dense urban areas. We think that proposals to improve coverage beyond the 40% limit should be allowed to introduce evidence to support their case which takes into account issues such as target field strength/clutter losses appropriate to the areas being covered.
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.	Yes We agree with the assessment that digital radio is aligned with changing listening habits, and that FM licensing should be used tactically where digital is not viable.
Question 5: Do you agree with our assessment on the impact of our	Yes We agree that, in general, digital licensing provides the opportunity to offer radio services to a wider spectrum of interests and audiences.

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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?	Yes Although not mentioned directly in the consultation, we would like to highlight issues arising from the constraint that a C-DSP licence may only be used on a single SSDAB multiplex. We understand the legislative and regulatory basis for this policy, but similarly to the initially rigid application of the 40% rule, we think some flexibility would be appropriate. The stakeholders in Bristol Digital Radio are analogue community radio licensees - Bradley Stoke Radio, Ujima Radio and BCfm Radio. We also carry analogue community radio services from KTCR (Keynsham) and Somer Valley Radio. Their FM coverage doesn't align with SSDAB coverage. For example, KTCR is on the edge of our coverage, and also equally on the edge of Bath Digital Radio. Bradley Stoke Radio pays for two licences; a C-DSP for the Severnside multiplex, and a DSP for Bristol Digital Radio. The other stations, despite being well-established and regarded community radio services, are broadcasting digitally under DSP licences because they're on two adjacent multiplexes. Whilst we recognise that allowance can be made for stations that are <i>based</i> in the overlap between two multiplex areas, we think that should be broadened to allow the case where a service (or its analogue footprint) can reasonably be said to <i>span</i> two SSDAB multiplexes.

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