

Consultation response form

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

Consultation title	Consultation on Ofcom's proposed strategic approach to broadcast radio licensing
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Representing (delete as appropriate)	Self / Organisation
Organisation name	Radio Sangam
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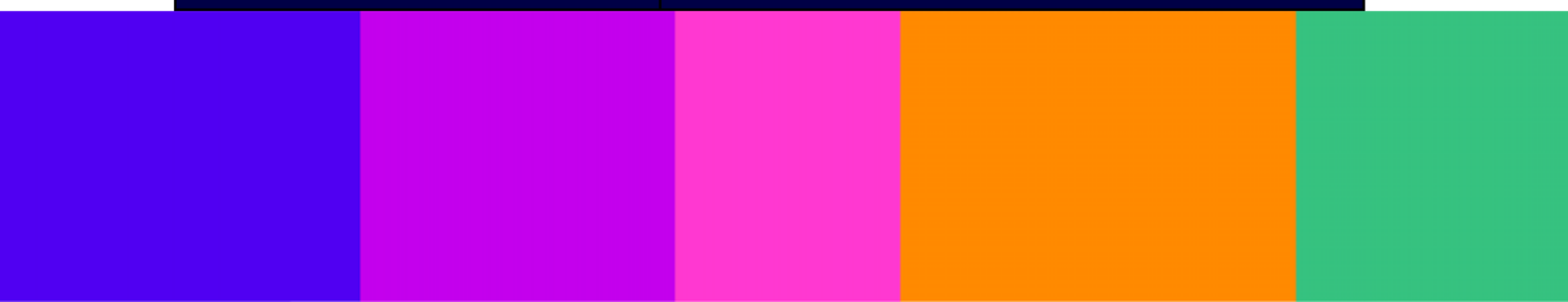
Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing / Your name / Organisation name / Whole response / Part of the response (you will need to indicate which question responses are confidential)
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None / Whole response / Part of the response (you will need to indicate below which question responses are confidential)
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes / No

Your response

Question	Your response
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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 As the FM frequencies continue to become more and more congested, it is pertinent to look at opportunities for the roll out, redistribution and or increased allocations in this area. The SSDAB has been a mixed batch with bigger cities with more population fairing well for organisations, however smaller conurbations and rural areas have found it extremely difficult to develop a sustainable and economically viable model for SSDAB. As a licence holder for SSDAB in Huddersfield (yet to be launched) we asked for an adjacent area which forms the same part of the local authority to be included in the launch but were refused. This in part makes the viability of the service much more challenging, alienates a community which sees itself as one and increases installation costs if in the future the area is reconsidered by OfCom to be included within the Huddersfield SSDAB polygon. Again this short site, demonstrates a lack of understanding of community outside of a London centric approach, lacks joined up thinking about Northern powerhouse strategies, economic decline in regions and a voice for community in what is one of the most difficult financial and downward economic trends in decades. We would urge OfCom to broaden its approach, it's strategy and thinking to be much more creative, than process driven which ultimately does not benefit communities or the nation as a whole. Overall the priorities set out are the correct ones, the implementation does need some foresight.
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 This very much is dependant on approach and timelines. If the process takes years to implement then local and national priorities that change over time may render the process uneconomical or surplus to demand. Time is probably the most crucial element of the strategies being thought out at this moment in time.
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	Confidential? – Y/ N It is vital that outside of larger cities, multiplex improvements become a priority for smaller towns and rural areas alike. Not only will this support sustainability but also provide an opportunity for more niche and community

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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.	based broadcasters to have a voice.
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 As a station which broadcasts to an underserved community, we would urge OfCom to analyse what is meant by community. To look more deeply at what defines a community and to undertake some research with communities as to what their definitions are. As a community FM licence holder, we have hundreds, if not thousands of queries per year, asking us why people in our region cannot hear us. Why they are barred from listening to us, why isolated older people cannot hear us in their homes, why are areas within our broadcast area blocked from receiving our transmission, even though there are no technical barriers or interference issues with other services. We cannot respond to these questions as we do not fully understand ourselves OfCom’s logic behind decision making.
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 In principle , we agree to some extent, however we would urge some consultation with the end user, the listner, the licence fee payer, the community that is being served – the customer rather than the provider of the service.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – Y/ N We would urge OfCom to support community FM licence holders to become more financially resilient, to increase broadcast parameters, to reduce barriers which are superficial and of little impact on the commercial sector. A point to note, for example is the latest and most increased community radio fund only benefitted 47 stations, with only a third of financial resources available than demand. We cannot expect continued financial support from the government – a begging bowl in hand by stations (often run by volunteers with limited skill sets), we need to ensure that we support the stations to

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	become resilient, sustainable and self sufficient by reducing barriers, by increasing opportunities, by supporting.

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