

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 agree in part with the proposed priorities. We support Ofcom's continued prioritisation of SSDAB and its proposals for coverage extensions and improvements. However, we urge Ofcom to give greater practical urgency to the processing of technical change requests from existing multiplex operators, particularly where viability is at stake. The High Peak multiplex is not currently financially viable. The area is small and remote, and the existing four-site configuration costs approximately £16,654 per year in site fees alone. This is not sustainable for a multiplex serving a dispersed rural community. We have submitted a formal application to Ofcom for a complete re-engineering of the multiplex, which would reduce annual site costs to approximately £2,000, extend coverage to an additional 13,000 people within the licensed polygon, and make the service viable for the first time since launch. Without approval of this application, we will have no realistic option but to surrender the licence. We do not support any policy direction that would make further local DAB multiplex licensing a routine expansion priority in markets where SSDAB is already established. In our area, SSDAB is the only viable lower-cost digital carriage layer. Introducing a competing local DAB multiplex would not serve the High Peak community and could undermine the fragile viability of our existing service. Confidential? – N
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.	Not fully, unless Ofcom gives greater weight to the sustainability of existing SSDAB operators in remote and underserved areas. In the High Peak, audience sufficiency is not a question of how many platforms exist in theory. Much of our coverage area is served only by Radio 4 on long wave. Our SSDAB multiplex represents the only realistic prospect of local digital radio for these communities. If it fails because Ofcom cannot accommodate a viable re-engineering proposal, these audiences will have no digital radio alternative.

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	The proposed priorities will only provide sufficient provision for audiences if Ofcom ensures that existing SSDAB multiplexes in underserved areas can adapt and survive, not just that new services are licensed elsewhere. Confidential? – N
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, we support a more flexible approach to the 40% ceiling and to SSDAB coverage extensions generally. We ask Ofcom to confirm that this flexibility extends to the kind of comprehensive re-engineering we are proposing - not merely marginal power increases or boundary adjustments. In our case, the re-engineering involves replacing all four transmitter sites with more cost-effective alternatives that also extend coverage to an additional 13,000 people within the licensed polygon. This is precisely the type of beneficial change that should be facilitated. We also have significant interest, and potential funding, in extending the High Peak multiplex eastward to cover Chesterfield, Matlock and Bakewell. Chesterfield has strong historical and economic association with the High Peak, and much of this area is among the most radio-underserved in England. An eastern extension would deliver SSDAB services to communities that have no realistic prospect of receiving them from any other source. We ask Ofcom to publish worked examples and decision criteria so that multiplex operators can plan technical investment and assess the likely prospects of approval with confidence. Confidential? – N
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.	We are concerned that the analysis does not sufficiently reflect the particular challenges facing SSDAB multiplexes in remote and rural areas. The High Peak is not comparable to urban SSDAB operations - it serves a dispersed population across difficult terrain with limited commercial revenue potential. The analysis should rec-

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	ognise that different SSDAB operations face fundamentally different viability challenges and that a one-size-fits-all approach to licensing priorities may not serve all areas equally. Confidential? – N
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.	The impact assessment does not adequately consider the risk to existing SSDAB operators if Ofcom's processes for technical changes are too slow or inflexible to accommodate urgent viability issues. In our case, the High Peak multiplex invested approximately £30,000 in establishing the service. It now faces closure because the original site configuration is unsustainable and Ofcom has not yet been able to accommodate the changes needed to save it. If the multiplex is forced to surrender its licence, the result will be the permanent loss of local DAB radio in one of England's most underserved areas, the waste of the operator's investment, and unused spectrum - all contrary to Ofcom's statutory duties. A proper impact assessment should consider not only the impact of new licensing activity but also the impact of regulatory inaction on existing operators. Confidential? – N
Question 6: Do you have any other comments to make on the proposals?	Spectrum flexibility in exceptional cases Our re-engineering application requires a new frequency block because the proposed Bowstone transmitter site would cause interference to the Warrington SSDAB multiplex on our current block (8B). Ofcom has indicated that spectrum availability is a constraint. We ask Ofcom to consider whether frequency blocks currently reserved for PMSE use in Band III could be made available in exceptional cases such as ours. In response to a Freedom of Information request (reference 01713131, November 2023), Ofcom provided data on PMSE usage of blocks 5A, 8C, 8D, 9D and 10A. That data

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	shows that PMSE usage on several of these blocks is extremely low - blocks 5A and 10A averaged only two licensed allocations per year across the entire UK between 2019 and 2023, and block 8D averaged five. Even the most heavily used block, 9D, averaged only 14 allocations per year nationally. PMSE usage is overwhelmingly concentrated at major event venues, arenas and production facilities - none of which exist in the High Peak. The probability of a PMSE allocation in this area conflicting with an SSDAB service is negligible. Using a PMSE-reserved frequency block for SSDAB in one of England's most remote and radio-under-served areas would not preclude PMSE use at any location where such demand actually exists - Silverstone, Castle Donington, major urban venues and similar locations are all at sufficient distance that sharing would be entirely practicable. We note that Ofcom stated in the FOI response that it has no plans to make any changes to the allocation of Band III spectrum but would keep this under review bearing in mind usage by current users and demand from other uses. The High Peak represents exactly the kind of demand from other uses that should trigger such a review. The cost of inaction If the High Peak multiplex is forced to surrender its licence because Ofcom cannot accommodate a viable re-engineering proposal, the result will be the permanent loss of local DAB radio in one of England's most under-served areas. The spectrum will sit unused, the £30,000 invested by the operator will be wasted, and the communities of the High Peak will have no digital radio alternative. This would be directly contrary to Ofcom's duties to secure optimal use of spectrum and a wide range of services. We urge Ofcom to use this consultation as an opportunity to demonstrate that SSDAB is a framework that supports operators through practical difficulties, not one that leaves them to fail when circumstances change. <i>Submitted on behalf of High Peak One Digital Ltd.</i>

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