

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? – N While this is an important and necessary proposal, it does not go far enough to ensure that the audiences and broadcasters most in need of protection are adequately supported to remain viable. In particular, this applies to community radio and the SSDAB sector, which increasingly provide the only meaningful local content as the BBC, commercial radio, and newspapers continue to scale back local provision. Addressing each point: • Requests to advertise new SSDAB multiplex areas – Ofcom should prioritise areas where there is clear and demonstrable demand, particularly in densely populated locations where spectrum is limited. Previous rounds have already provided sufficient opportunity to re-advertise unsuccessful areas, so the focus should now shift toward strengthening existing licence awards. • Requests to advertise additional local DAB multiplex licences – I have no objection to this where demand is evident and spectrum is available. • Applications to improve or extend SSDAB coverage – This is essential to the long-term success of the platform. • A more flexible approach to the 40% ceiling – A marginal increase will not be sufficient to make a meaningful impact. In many cases, a significantly higher threshold is required, particularly as the current figure is increasingly outdated. • New FM community radio licence rounds – Acceptable where there is a clear need and available spectrum. However, these should not be prioritised in areas already well served by SSDAB.

Question	Your response
	• Renewals and extensions for analogue licences – Broadcasters should retain the ability to determine their own analogue switch-off timelines, but this should not be prioritised, particularly in areas with reliable DAB coverage. • Technical changes for analogue services – These should not be prioritised in areas with strong DAB provision, given the declining relevance of analogue platforms from an audience perspective. • Ongoing licensing programmes – Supported. • Continued support for existing licensed services – Supported.
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? – N Unless SSDAB coverage is strong and reliable across the intended service areas—particularly within towns and cities—audiences will not be adequately served. Weak coverage disadvantages smaller broadcasters relative to larger, better-funded operators and undermines local democratic engagement.
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? – N We agree that the 40% ceiling should be reconsidered, but the changes proposed by Ofcom are not sufficiently far-reaching. The original intention of the 40% rule appears to have been to prevent migration from Local DAB to lower-cost SSDAB services targeting high-population areas. However, after five years of SSDAB rollout, there is no evidence that this has occurred, raising questions about whether this protection remains necessary. Using Aberdeen as an example, the local multiplex is nearly full and dominated by established operators who are unlikely to migrate. Meanwhile, SSDAB provision is constrained by the 40% rule, leading to fragmented coverage and, in this case, the need to advertise two separate multiplex areas. This has

Question	Your response
	proven unviable, leaving parts of the city underserved—contrary to the intended goals of SSDAB and resulting in a clear imbalance favouring larger commercial operators. Signal strength assumptions also disadvantage SSDAB. The use of 63 dBµV/m as a benchmark does not deliver reliable indoor reception in many urban environments, particularly where building materials and density obstruct signals. From a regulatory perspective, it is difficult to see how Ofcom’s duty to promote competition and serve citizens is met if services cannot be reliably received. SSDAB has already increased plurality and enabled new local and community services, but its effectiveness is constrained by both coverage limitations and interference issues. Community radio plays a vital role in delivering local and minority-focused content, yet it is currently at a structural disadvantage compared to larger broadcasters. If SSDAB is to support a transition away from analogue—particularly with potential FM switch-off timelines approaching—coverage must be robust and reliable. A small increase to the 40% limit will not resolve these issues. A more flexible, case-by-case approach is required, prioritising strong indoor reception within the target area, even if this results in higher levels of overlap outside it. Additionally, following Round Eight, Ofcom should review the SSDAB frequency plan to reduce interference and optimise coverage based on real-world deployment outcomes.
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? – N While I broadly agree with the analysis presented, it is essential that future regulatory policy delivers outcomes consistent with these conclusions. Key observations include the continued growth of digital listening, the expansion of community radio, and the ongoing decline of AM and, increasingly, FM. These trends clearly indicate a transition toward digital platforms.

Question	Your response
	AM is effectively being phased out organically. FM is likely to follow, potentially around 2030, particularly as infrastructure costs rise and shared transmission sites become less viable. Despite the recognised social value of community radio, current regulation does not place it on an equal footing with commercial operators. The 40% rule, combined with coverage limitations, restricts its ability to compete effectively on DAB. International experience, such as in Norway, demonstrates that digital transition can succeed—but also highlights the risk of community radio being left behind if not properly supported.
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? – N Annex A3 outlines important principles but does not yet present a fully workable solution. The UK has a strong and competitive radio sector, supported by effective regulation. However, ensuring that all audiences are served equally requires more than high-level commitments. Community radio has a unique role in delivering social value, and SSDAB provides a cost-effective and environmentally efficient platform for its distribution. However, current constraints—particularly the 40% rule—limit its ability to benefit fully from digital transition. Without meaningful improvements to coverage and prominence, community services risk being marginalised in an increasingly competitive digital environment.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – N Radio in the UK remains resilient despite growing competition from global digital platforms. However, significant challenges remain in delivering reliable access to local, community-focused, and non-commercial services—particularly for underserved audiences.

Question	Your response
	Ofcom should focus less on re-advertising previously unsuccessful SSDAB areas and instead prioritise the sustainability of existing licences. This includes: • Ensuring transmission power levels that support reliable indoor reception comparable to local and national multiplexes • Defining coverage areas that align with audience expectations and justify investment from resource-constrained community broadcasters • Preventing community radio from being confined to declining platforms • Taking a pragmatic regulatory approach that prioritises those services most in need of support

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