

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.	Infocus Digital Media Ltd believes that regulatory priority should be firmly placed on supporting and sustaining the Small-Scale DAB (SSDAB) sector, rather than defaulting to the introduction of new local multiplex licences in areas where existing capacity may be constrained. SSDAB multiplexes are already established and actively serving local broadcasters and communities. Introducing a new local DAB multiplex in these same areas risks undermining that ecosystem. In particular, it creates a strong likelihood that services—especially commercial operators—would migrate to the new local multiplex platform, drawn by perceived scale or commercial advantage. This would directly impact the viability of existing SSDAB multiplexes, which rely on a stable base of services to remain sustainable. We therefore believe that, before any new local multiplex licences are awarded, Ofcom should give due consideration to the presence and stability of existing SSDAB services in the area. Protecting these platforms is essential to maintaining diversity, supporting smaller broadcasters, and ensuring continued local innovation. Furthermore, we recommend that the licensing of new / existing community and small commercial radio services should be aligned with the SSDAB framework. Specifically, where an SSDAB multiplex is available within the licensed area, there should be a clear expectation—or formal condition—that services broadcast via that SSDAB platform. This would mirror previous commercial radio licensing policy, where services were granted automatic FM licence renewals on the basis that they broadcast on their local DAB multiplex, thereby supporting the development and long-term sustainability of digital transmission infrastructure and actively incentivising digital migration. In addition, we believe that FM Restricted Service Licences (RSLs) should only be granted in areas where no SSDAB multiplex is available. Allowing RSLs to operate in areas already served by SSDAB risks diverting services away from digital platforms and weakening the economic viability of existing multiplexes. Aligning RSL policy

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	in this way would further support the long-term sustainability and relevance of SSDAB. Such an approach would: • Strengthen the long-term viability of SSDAB multiplexes • Support local and community broadcasters through stable, accessible digital platforms • Reduce market distortion caused by competing platforms within the same area • Encourage consistent use of digital infrastructure • Ensure a more balanced and sustainable radio ecosystem In summary, we urge Ofcom to prioritise the protection and development of SSDAB services as a key part of the UK's radio landscape, and to avoid regulatory decisions that could unintentionally destabilise a platform that is already delivering clear local and public value.
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.	Infocus Digital Media Ltd welcomes Ofcom's review of the 40% overlap restriction. However, we do not believe that the proposed move to a "clear minority" threshold is sufficient to address the underlying issues. The current policy was introduced to protect existing multiplex operators, but experience has shown that these concerns have not materialised. The wider DAB market is now well-established and resilient, and there is no clear evidence that SSDAB growth has caused harm. In its current form, the overlap restriction is limiting the ability of SSDAB operators to improve coverage,

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	address reception gaps, and fully serve their li- censed areas. This ultimately impacts listener expe- rience and restricts innovation. We believe Ofcom has the discretion to take a more flexible, case-by-case approach. Doing so would better support its wider objectives, including promot- ing competition, encouraging investment, and im- proving choice for audiences. Infocus Digital Media Ltd therefore recommends a more pragmatic framework that allows greater over- lap where justified—particularly where it enhances coverage, benefits listeners, and does not create technical issues within the spectrum.
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.	
Question 5: Do you agree with our assessment on the impact of our proposed broadcast licensing priori- ties 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.