

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.	I welcome the proposal to prioritise extensions and license new community stations on FM, as this offers high standards of access and accountability. An interesting change is the move to an ad-hoc, case-by-case basis for new SSDAB multiplexes. This approach would also be beneficial for further analogue community radio licences and be more inclusive for communities facing challenges around common issues such as volunteer capacity and grant funding, rather than time limited rounds. Any move to reduce bureaucracy is likely to have a positive impact on enabling marginalised communities to have access to the media they need My recommendation is that AM, FM and SSDAB should all remain open and licensed on an ad-hoc basis.
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.	Though it is good to increase the number of services overall, especially in poorly served rural areas, it is quality rather than quantity that matters. In community radio <i>audience</i> is quite a problematic concept, as it is associated with a passive mode of audition. It is more helpful to talk about the needs of communities, in which people move freely between modes of listening, producing, and other forms of active engagement. The processes of collaborative production foster media literacy, and a healthy democracy, underpinned by healthy media, needs to facilitate access at all levels. So though these proposals will increase the number of services, it is not clear that they will provide for the needs of audiences to access participation. And an increase in services that rely heavily on automation, and are similar in content to existing stations will not improve choice for listeners.
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	I understand from discussions with colleagues at other stations that there have been genuine frustrations with the lack of coverage on SSDAB, and that this may need revisiting. However I would urge caution on lessening any restrictions on SSDAB without sufficient evidence that it

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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.	is providing genuine choice and plurality of content and good quality access to participation. As the restrictions applied to analogue community radio were not fully transferred over to SSDAB, the 40% rule stands as a protection against a commercially driven SSDAB that competes with the larger multiplexes. SSDAB has however benefitted from a background culture of analogue community radio which has inspired good practice. This has relied on the balance of services available and the continuation of a thriving, evidence based community radio culture. If SSDAB is to increase will this still be the case? If multiplexes wish to extend their range they should be able to demonstrate the potential for positive impact. The lack of clarity around pricing for DSP and CDSP services has meant that in some areas CDSPs are free of charge and in others more expensive than an FM licence. Another issue is that multiplex owners hold several licences in a region, and thus their pricing is not competitive. In some instances the same individuals involved also operate several services on their own mux. Mux owners requesting extension should be scrutinised for their pricing policies; the quality of accountability to the target community of both the mux and the broadcasters, for example: transparency of governance and public AGMs; diversity of services using the mux; quantity and quality of access to those services for citizens. If the removal of the 40% rule is accompanied by these considerations it may then be able to support better media and avoid competition with the larger DAB operators.
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.	As there is spectrum availability there is little advantage in closing applications for AM services. The low demand implies that Ofcom would not be overwhelmed by applications but that the occasional licence where required could be issued ad-hoc. AM should be seen as a medium, materially different to FM and DAB, and restricting access equivalent to restricting access to oil paints, for example. It benefits culture to have plurality of media, and the artistic

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	potential of different parts of the spectrum should not be overlooked, even if they are niche. In some countries, eg the Netherlands and Finland there has been a revival of interest in AM and the opportunity for community broadcasters to access licences. The context of global instability is a factor in the rise of interest in analogue media of all kinds, for example the "Shortwave Collective"; Meshtastic; Πnode; and ham radio enthusiasts and transmission artists in general. This revival can be likened to the revival of vinyl records once the differences between MP3 and other formats were fully appreciated. Unlike FM, AM receivers can be built from scrap by a child and powered by radio waves in the atmosphere. Such experiences connect us deeply to the wonder of our media infrastructures, their nature and culture and are integral to a resilient society.
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.	These proposals are quantity rather than quality focused, but in an era of abundance of media choice and misinformation, more does not always mean better. An increase in services must come hand in hand with quality control and support for communities to make wonderful radio together.
Question 6: Do you have any other comments to make on the proposals?	More research is needed on the benefits of SSDAB so far before it is increased, as the quality of governance and management of multiplexes appears to vary greatly.

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