

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 support Ofcom's review of its licensing priorities. We support an opportunity for new Local DAB multiplexes to serve large urban areas (in particular where numerous small-scale multiplexes are advertised to cover a city, where one new multiplex would provide efficient coverage using less transmitters).
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.	Yes As noted in the consultation document, audiences are choosing to listen to radio digitally. Whilst we recognise that this is not universally possible for all audiences, the combination of streaming (including smart speakers) and DAB offers a good combination of accessibility and variety of services for listeners in a wide variety of listening scenarios.
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 believe that, where needed, small-scale multiplexes should be able to review opportunities to enhance coverage, say through power increases, where this eliminates gaps in coverage between transmitters (where they operate more than one). However, enhancements should not lead to any significant breaches of the 40% ceiling.
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.	Yes We agree with the assessment that digital radio is aligned with changing listening habits, and that FM licensing should be used tactically where digital is not viable.
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?	Yes We agree that, in general, digital licensing provides the opportunity to offer radio services to a wider spectrum of interests and audiences.

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Question 6: Do you have any other comments to make on the proposals?	Yes Although not mentioned directly in the consultation, we would like to highlight issues arising from the constraint that a C-DSP licence may only be used on a single SSDAB multiplex. We understand the legislative and regulatory basis for this policy, but think some flexibility would be appropriate especially where community radio services have FM coverage that doesn't align with SSDAB coverage and so a community station needs both a C-DSP and DSP licences to broadcast on contiguous small-scale multiplexes. Whilst we recognise that allowance can be made for stations that are <i>based</i> in the overlap between two multiplex areas, we think this should be broadened to allow the case where a service (or its analogue footprint) can reasonably be said to <i>span</i> two SSDAB multiplexes.

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