

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.	We broadly agree with the proposed licensing priorities set out in the consultation at section 4.12. We have been helping local groups apply for and build SSDAB multiplexes since the 2021, and our involvement in the principles and concepts of low-cost DAB using innovative technologies and techniques goes back a decade before that. We believe strongly that Small Scale DAB should be the licensing priority. It has proven capable of delivering a high quality experience to listeners, opening up significantly more variety of radio (and data) services, and crucially, supporting local media providers at a time when many larger groups are withdrawing from the market. As audiences migrate from analogue to digital listening, SSDAB is preventing the disenfranchisement of many listeners from their radio services. Many SSDAB multiplexes provide additional services, such as DAB SPI, which are not provided by existing multiplexes, and have been identified as being important in keeping DAB present and prominent in vehicles. Ofcom should remove the obstacles that maintain any perception that Small Scale DAB is a lesser technology. It should be a priority to allow existing multiplex operators to propose coverage improvements, using a more nuanced coverage model that is more realistic about clutter losses and similar coverage affecting parameters. When considering allocating spectrum to new “local” DAB multiplexes, the assessment must consider the impact on existing/future SSDAB multiplexes, and what specifically that a new “local” DAB multiplex would do that couldn’t be done through improvements/changes to existing SSDAB multiplexes. Given the ability for car radios to seamlessly follow a service across adjacent multiplexes, effective contiguous coverage of a wider area does not require a single multiplex on a single frequency.
Question 2: Do you consider that the proposed broadcast licensing priorities for the short to medium term	Yes As noted in the consultation document, audiences are choosing to listen to radio digitally. Whilst we recognise

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will provide sufficient provision for audiences? Please give reasons for your answer.	that this is not universally possible for all audiences, the combination of streaming (and “smart speakers”) and DAB offers the best 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, with qualifications. Whilst the legislative intent of the “40% ceiling” rule is understood, the practical implementation is far more complex, relying on many assumptions and inputs to models that aren’t consistently accurate in real life. In particular, the use of a blanket field strength level to define coverage is not in line with international planning strategies which recognise that urban and dense urban areas need significantly more signal. Ofcom should allow those assumptions to be challenged, with evidence, when considering requests to improve coverage beyond the currently defined “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? Please give reasons for your answer.	Yes We agree that, in general, digital licensing provides the opportunity to offer radio services to a wider spectrum of interests and audiences.
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.