

A7. Consultation questions

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Page | 1

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Consultation question 1:

Do you agree with the proposed broadcast licensing priorities for the short to medium term? Please give reasons for your answer.

Yes, I agree with the proposed broadcasting licensing priorities in the short to medium term. My reasons are that DAB local multiplexes (which mainly cover one or more counties) and SSDAB multiplexes bring the most services to people across the UK, thus giving greater listener choice.

I would, however, reorganise the priorities so that the need for further FM community licences has a higher priority than more DAB local multiplex licences. My list would therefore be as follows:

- requests to advertise new SSDAB multiplex areas;
- applications from existing SSDAB multiplex licensees to improve or extend the coverage of the multiplex;
- a more flexible approach, where appropriate, in our application of the '40% ceiling' regarding SSDAB;
- consideration of application rounds for new FM community radio licences
- applications for renewals and extensions for commercial and community analogue licences;
- requests to advertise further local DAB multiplex licences in areas where there is both obvious demand and frequencies are available;
- applications from existing commercial and community analogue licensees for technical changes;
- support for ongoing licensing programmes which are already being undertaken; and
- continuing to provide ongoing support for incumbent licensed services.

Consultation 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.

Page | 2

Yes, but only if FM community licences are made available in areas where SSDAB multiplexes were not offered or were handed back to Ofcom as being unviable, but where community groups wish to operate an FM community radio station for and with the involvement of their local community in small towns and villages in coastal and rural areas.

Consultation 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.

I believe that Ofcom needs flexibility in applying the ‘40% Rule’, to provide an SSDAB operator to fully cover their licence area, even if the coverage improvement is above the 40%. The difference between an SSDAB licence and a Local DAB licence is in the wording – SSDAB is Small-scale and not local, which in the case of a Local DAB licence means it covers one local government county or more.

Consultation 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.

Overall, I agree with Ofcom’s assessment as the radio listener now has a much wider selection of radio and other audio options, mainly due to the expansion of DAB services and the convenience of listening to podcasts, music streaming services, and other online content, including over 70,000 online radio stations. All this means that local community radio requires low-cost ways of reaching their local audience, which in many rural and coastal parts of the country, especially where SSDAB is not available, means that low-powered FM is the only option, as often, there are FM frequencies available. These community stations can tailor their programmes to their local audiences in ways that networked stations are

unable to and are not required to do under current regulation and legislation.

Consultation 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.

Page | 3

I agree that, where financially viable, SSDAB has been beneficial in those cities and large towns, giving listeners a wider choice. But as stated in A3.12, there is often a need for new community FM licences where this is not the case, and so Ofcom has stated that they will be inviting applications to apply (ITA) for community FM licences, which is a positive move to increase listener choice.

Consultation question 6:

Do you have any other comments to make on the proposals?

In some parts of the country, there were no applicants for an SSDAB multiplex licence in the 2010s, or the issued licence was handed back to Ofcom, thus leaving those areas without any community radio at all, either on FM or DAB. It is therefore vital that community organisations in those areas, which are mainly rural or coastal, have the opportunity to respond to an Invitation to Apply (ITA) for

M band is available in the majority of radios, either older AM (LW/MW)/FM radios and on current DAB/DAB+/FM radios at home, in the office and in cars of all ages, thus allowing an FM community station to reach local audiences regardless of income category.