

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.	Confidential? – N Yes, broadly. We support the proposed priorities and welcome in particular the commitment to continue FM community radio licensing and to support SSDAB coverage improvements. However, we wish to draw attention to a structural issue that the proposed priorities do not yet address: the position of minority-language community stations operating on SSDAB. Radio Utsav broadcasts in Gujarati and serves the South Asian communities of the East of England. We are representative of a wider group of community stations broadcasting in languages including Punjabi, Urdu, Bengali, and Tamil. These stations serve audiences that commercial radio does not reach, and that are often digitally excluded or reliant on radio as their primary means of cultural connection. SSDAB carriage fees represent a significant and disproportionate burden for stations of this type. Our revenue is structurally constrained - not as a result of poor management, but because local businesses frequently do not understand the value of specialist-language audiences, national advertisers rarely target niche linguistic communities, and existing audience measurement tools consistently undercount minority-language listeners. We are therefore expected to pay carriage costs set at commercial-equivalent levels whilst operating in a market that does not support commercial-equivalent revenue. We would ask Ofcom to consider, as part of finalising these licensing priorities, whether the current approach to SSDAB carriage treats minority-language community stations equitably. Welsh-language broadcasters receive subsidised or free carriage on the basis that their language is culturally essential. The same principle applies with equal force to the languages of the UK's South Asian communities. There is a further and related problem that the proposed priorities do not address: SSDAB transmitter power limits are preventing community stations from providing meaningful coverage to the communities they are licensed to serve. Radio Utsav holds carriage on the

	Rugby, Leicester, and Loughborough SSDAB multiplexes, but there are significant gaps in coverage across Birstall, Syston, Anstey, Oadby, Wigston, and Blaby - all areas with substantial South Asian communities that we exist to serve. We have been advised by the multiplex operators that these coverage gaps result directly from power limits imposed by Ofcom. The alternative - carriage on Leicestershire DAB - would cost approximately £72,000 per year, which is wholly unaffordable for a volunteer-run community station, and we understand there is in any case no capacity currently available on that multiplex. We ask Ofcom to review whether the power limits applied to SSDAB transmitters remain appropriate, and to consider whether there is a route by which stations in our position can achieve adequate coverage of their intended service area without bearing costs that are commercially unrealistic.
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.	Confidential? – N Only partially. The proposals provide a reasonable framework for the majority of licensed services, but they do not adequately address the sustainability of minority-language community radio stations on SSDAB. These stations deliver content that fulfils Ofcom's statutory social gain criteria directly - cultural preservation, civic participation, health messaging for underserved communities, support for new arrivals and older residents, and volunteer development. They are not incidental contributors to these outcomes; they are often the only broadcast service doing this work for their communities. Without some form of financial support mechanism for SSDAB carriage, a number of minority-language stations face an unsustainable position. We would urge Ofcom to consider introducing a Public Value Carriage Scheme - a subsidised or free SSDAB carriage tier available to minority-language stations, hyperlocal community stations, and stations delivering cultural, religious, or social cohesion content. This would mirror the existing Welsh model and align directly with Ofcom's duties in relation to media plurality, cultural representation, localness, and social gain. The affordability problem is compounded by a coverage problem. Even where a minority-language station has

	secured SSDAB carriage, Ofcom's transmitter power limits can prevent it from reaching the communities it exists to serve. Radio Utsav is carried on the Rugby, Leicester, and Loughborough SSDAB multiplexes, yet faces significant coverage gaps across communities including Birstall, Syston, Anstey, Oadby, Wigston, and Blaby. Moving to Leicestershire DAB would address coverage but at a cost of approximately £72,000 per year - an impossible sum for a volunteer-run station - and there is no available capacity in any event. The proposed priorities do not address either of these barriers. A station that can neither afford adequate carriage nor achieve adequate coverage through the carriage it can afford is not being adequately served by the current framework. We also support the proposal to maintain FM access. Many of our older listeners rely on FM and do not use apps or smart speakers. FM remains the most accessible and affordable platform for this audience and should be preserved for as long as there is demonstrable need.
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.	Confidential? – N Yes. A more flexible approach to the 40% ceiling is sensible where significant public benefit can be achieved through minimal exceedance. We support the principle of proportionality in its application, and agree that the presumption against greater overlap should remain while allowing for exceptional circumstances to be considered on their merits. For minority-language stations in particular, coverage improvements can be critical to reaching geographically dispersed communities. We would ask that community and cultural benefit be given appropriate weight when assessing any applications where the 40% threshold is in question.
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.	Confidential? – N Broadly yes, though we note that the analysis table at Annex A1 does not specifically reflect the position of minority-language community stations, which face distinct challenges that do not map neatly onto the general categories presented.

	In particular, the table's treatment of AM as having limited audience demand except for rural locations and minority communities is noted - and we would emphasise that for those minority communities, this is not a marginal consideration but a primary one. AM continues to provide coverage to geographically dispersed diaspora communities that DAB and FM do not serve as effectively. Any decisions regarding AM licensing should take this into account. We also note that the analysis does not address the financial viability of SSDAB for community stations in any detail. The demand for SSDAB is real, but demand does not translate into sustainability where carriage costs exceed what the available revenue model can support.
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.	Confidential? – N Partially. We welcome the acknowledgement at paragraphs A3.10 to A3.12 that community radio serves underrepresented groups and that analogue licensing can benefit specific minority communities. These observations are accurate and important. However, the impact assessment does not specifically address the position of minority-language SSDAB stations, and therefore does not fully account for the risk that the proposed priorities - taken as a whole - could have a negative impact on this group if carriage costs remain at current levels without any support mechanism. We would ask Ofcom to consider whether a fuller equality impact assessment, specifically addressing linguistic minority communities served by SSDAB stations, would be appropriate before the final statement is published.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – N We wish to make four further points. First, on the question of a Public Value Carriage Scheme: we ask Ofcom to consider recommending to government that such a scheme be explored, even where it falls outside Ofcom's own powers to implement directly. The Welsh model demonstrates that subsidised carriage for

	culturally essential language services is both workable and consistent with good regulatory practice. There is no principled reason why it should not extend to other UK community languages. Second, on licensing stability: community stations need long-term certainty in order to plan effectively and raise funds. We would welcome a commitment from Ofcom to simplify licensing processes where possible and to ensure that carriage costs and licence conditions are predictable over meaningful time horizons. Third, on SSDAB coverage and transmitter power limits: we ask Ofcom to review whether the power limits currently applied to SSDAB transmitters are appropriate, having regard to the coverage needs of community stations serving geographically dispersed minority communities. Where those limits prevent a station from reaching its intended service area, and where the alternatives (such as local DAB carriage) are unaffordable or unavailable, Ofcom should consider what regulatory flexibility or relief is available. A licensing framework that allows a station to hold a licence but not to serve its community is not delivering the public value it was designed to provide. Fourth, on audience measurement: RAJAR data consistently undercounts minority-language listeners. This affects not only the commercial case for advertising on our stations but also Ofcom's own evidence base for decisions about community radio. We would ask Ofcom to engage with RAJAR about whether measurement methodology can be improved for this audience segment, and to take the limitations of current data into account when assessing the impact of its proposals on minority communities.
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