

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.	Confidential? –N We welcome the proposal for new FM community licences as an immediate priority, whilst there is still appetite from listeners, particularly in hard to reach rural areas. Local DAB being converted to DAB+ will allow more stations – this is only recently happening, and may mean further local multiplexes aren't necessary. Coverage improvements for existing SSDAB is a sensible move, as is new SSDAB areas on demand, subject to frequencies being available, and this not causing increased interference and hole punching to existing operators.
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 We believe the plans are audience focused, and if some FM community, and to some extent further SSDAB and even local DAB is licenced, this can only be to the benefit of audiences. There are few other viable options under OFCOM's remit, other than ensuring broadcasters are given an easy pathway onto smart speakers
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 We agree some flexibility in the 40 per cent rule will be of benefit to audiences and operators – coverage should be allowed to follow sensible geographic boundaries, whilst maintaining a distinction between local DAB and SSDAB areas.
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 Yes, although we would suggest FM listening is showing a larger apparent decline due to an increase of stations on DAB only taking some market share from stations also on FM– in reality listeners car radios may be switching to FM in some areas for better signal, so FM may be taking more of a share without listeners knowing.

Question	Your response
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 Yes, while we agree that SSDAB allows more stations, we are pleased to see it noted that further FM licencing may still provide a viable alternative to reach communities in rural areas, where providing SSDAB is more challenging both technically and financially due to a lower number of services carried on the multiplex, and more transmitters needed to cover sparse areas of population, where mobile connectivity is also often problematic. This has certainly been our experience as a full service local community radio station, where our local SSDAB multiplex operator cannot viably serve all of our intended broadcast area due to the amount of transmitters needed versus the small number of stations carried. We also find the penetration of the service in the car suffers in our town centres due to nearby buildings – areas where traffic queues so listeners can lose the signal for an unacceptably long time due to being stationary. We have also kept in touch with our local electrical retailers, who tell us half of the radios they sell don't have DAB, only FM, and hundreds of our listeners have now signed our petition calling to hear us on FM, which we've not been able to apply for since we launched in March 2021 as no licence has been offered.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – N No further comments to make.

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