

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.	Confidential? – N We broadly support Ofcom’s proposed priorities, in particular the continued focus on small-scale DAB and the intention to support coverage improvements and extensions for existing SSDAB multiplexes. However, we do not believe that the current proposals go far enough to address what is now a clear and systemic issue affecting SSDAB delivery. In particular, the continued application of the 40% overlap rule is significantly limiting the ability of multiplex operators to provide effective and reliable coverage within their intended service areas. While we welcome Ofcom’s recognition that a more flexible approach may be required, we consider that the proposed level of flexibility is too limited and risks failing to resolve well-established issues in practice. Our experience in Aberdeen demonstrates that the current framework can produce outcomes that are contrary to the objectives of the SSDAB programme, restricting access to community radio services and undermining their sustainability.
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 SSDAB has been highly effective in enabling a wide range of new services, particularly community and locally focused stations, to access digital broadcasting. However, the current restrictions on coverage mean that these services are often not reliably available to the communities they are intended to serve. In Aberdeen, the application of the 40% rule has resulted in only partial coverage of the city. This means that audiences are unable to access local community radio services consistently, particularly indoors. This is compounded by the fact that current planning assumptions do not reflect real-world listening conditions in dense urban environments, where indoor reception requires a more robust signal than is currently achievable under existing constraints. As a result, citizens and consumers are not adequately served by services that they cannot reliably receive in their homes. Unless the 40% rule is reformed in a more meaningful way, the proposed priorities will not deliver sufficient provision for audiences, particularly in urban areas within larger regional multiplex footprints.

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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 welcome Ofcom’s recognition that the current strict application of the 40% rule can lead to perverse outcomes, and we support the intention to introduce greater flexibility. However, we do not agree that the proposed approach is sufficient. The consultation suggests that flexibility would be applied only in exceptional circumstances and would generally be limited to minimal exceedance of the 40% threshold. In practice, this will not address the scale of the issue faced by many SSDAB operators. In Aberdeen, the 40% rule has led to a perverse outcome. Because the majority of the population within the local DAB multiplex area is concentrated within the city, the restriction required the area to be divided into two SSDAB multiplexes. This has proven commercially unviable, resulting in only one multiplex being licensed and launched. The consequence is that community radio services are only available via DAB across part of the city, rather than the community they are intended to serve. This directly undermines the objectives of the SSDAB programme. Enabling full coverage of Aberdeen city would represent a significant public benefit. It would ensure equitable access to community radio services, improve listener experience, and support the sustainability of local broadcasting. However, achieving this would require a level of overlap that goes beyond minimal exceedance. A case-by-case approach limited to marginal adjustments will not resolve this issue. In effect, the current proposal risks preserving the very outcomes that Ofcom has identified as problematic. We therefore recommend that Ofcom adopts a more flexible and proportionate interpretation of the 40% rule, allowing greater exceedance where there is clear evidence of public benefit and where it enables effective service delivery within the intended coverage area.
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 We broadly agree with Ofcom’s analysis, particularly in recognising the importance of digital platforms and the continued role of SSDAB in supporting community and local services. However, we believe the analysis underestimates the extent to which SSDAB coverage limitations are constraining the effectiveness of the platform. While SSDAB is positioned as a key mechanism for delivering local and community services, its ability to fulfil this role is significantly impacted by regulatory constraints, particularly the 40% rule and associated power limitations.

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	Without addressing these constraints, the benefits identified in Ofcom's analysis cannot be fully realised.
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 We broadly agree with the direction of the impact assessment, but we believe it does not fully capture the negative impact of current SSDAB coverage constraints on audiences and service providers. In particular, the assessment does not adequately reflect: - the reduced accessibility of services due to incomplete or unreliable coverage - the impact on community radio stations that rely on SSDAB as an affordable route to digital broadcasting - the risk to the sustainability of SSDAB multiplexes where coverage limitations reduce their attractiveness and viability Addressing these issues through more meaningful reform of the 40% rule would significantly improve outcomes for both audiences and providers.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – N SSDAB has been a highly successful policy intervention, enabling a significant expansion in the number and diversity of radio services available to UK audiences. The core model is working. However, the current coverage limitations are preventing it from delivering its full potential. Our experience, alongside that of other operators across the UK, indicates that the primary barrier is not demand or viability, but the constraints imposed by the current regulatory framework, particularly the 40% overlap rule. We would encourage Ofcom to prioritise: - enabling meaningful coverage improvements for existing SSDAB multiplexes - adopting a more flexible and outcome-focused approach to the 40% rule - ensuring that regulatory decisions are guided by the principle of delivering reliable, real-world coverage to the communities being served A more ambitious approach in this area is not simply desirable but necessary. Without meaningful reform, SSDAB will remain structurally constrained at the point it should be expanding its contribution to

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	community media and digital radio. Addressing this now would unlock significant public value and ensure that the platform can fulfil the role it was designed to play.

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