

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 On the whole we agree with the priorities as set out, however, we believe there is still much yet to be done if SSDAB is to reach its full potential. For this reason, we would propose that requests for additional SSDAB licences and coverage extensions are prioritised ahead of new local DAB licences. Since available spectrum is limited, if a frequency block were to be allocated to a new local multiplex it cannot be used to improve SSDAB coverage and we are concerned that the approval of new local DAB licences might constrain or reduce the ability to improve SSDAB coverage.
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 Yes
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 would propose that greater flexibility is applied to the ‘40% rule’. The application of this constraint results in restrictions to coverage in some areas resulting in low signal strength delivering poor or no reception. There are some licensed areas where the coverage ‘boundary’ appears to be illogical and there are other areas where at present there is poor or no SSDAB coverage, however, the option to request an extension of an existing SSDAB mux to remedy this is not available due to this constraint. While we appreciate the sensible intention behind the 40% limit, it has sometimes produced perverse decisions damaging to the development of SSDAB. In some rural areas or where the original local DAB areas were relatively small this resulted in the advertisement of impractical or illogical licence areas. A simple example in our region was the ability to sensibly offer a combined Newcastle & Gateshead polygon while just to the south it was not deemed possible to offer a combined Stockton & Darlington licence - because this

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	would exceed the much lower 40% population limit in the "Teesside" local MUX area. In each case the technical, economic, social and editorial arguments for the combined community were the same but the historically smaller FM TSA forced new SSDAB areas to be restricted in the, already economically challenged, Teesside area. We feel that recognition of this effect should be reflected in Ofcom policy going forward. Finally, there are a number of areas that have been previously advertised but are as yet unlicensed. It is likely that some of these areas will not be commercially viable, or it may be that interested parties lack the resources or experience to operate a mux. It is likely, however, that there will be examples where SSDAB coverage to these areas could be provided in a cost-effective way through extending coverage of an existing mux, however, the overlap constraint may prevent this. Another way of looking at this issue might be for Ofcom to review the current methodology for calculating 'in-door' coverage and, hence, the extent of an SSDAB licensed area. In many cases the prediction is not reflected in real-world experience. As a result, we suggest that Ofcom considers carrying out a review of the current criteria in the light of experience.
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 have no comments
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 have no comments
Question 6: Do you have any other comments to make on the proposals?	Confidential? – N No further comments

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