

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.	Broadly, yes. A comment: The highest priority appears to be given to requests to advertise new SSDAB multiplex areas on an ad-hoc basis. The experience to date with even quite populated and wealthy areas being advertised and competed for, but the successful group subsequently choosing not to proceed; and the existence of several smallscale multiplexes only hosting one or two services – should be borne in carefully mind . Criteria for financial viability, and proposer's statements of demand and services to be carried, should all be judged critically. Near-empty multiplexes reduce available coverage and financial viability of multiplexes in adjacent and second-adjacent areas just as much as if their capacity was actually used. Of course this may be technically unavoidable, but judgements regarding the most beneficial and appropriate use of broadcast spectrum need to be made realistically and with the benefit of real-world SSDAB experience to date.
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.	Yes. While SSDAB is clearly the focus, analogue transmission may still have a useful role to play particularly in sparsely populated and larger areas.
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.	Yes. Frequency planning for the smallscale DAB rollout to date has, for understandable reasons of simplicity, uniformity, familiarity and comparability, relied on multi-decades-old industry standard computer modelling techniques and calculated field strength limits. These were designed for circumstances very different to those faced by small scale DAB operators. They certainly serve a useful wide-area planning purpose, but in some cases the reality of the detail is quite different, especially in heavily built up areas. The highly simplified modelling is deficient in various ways, for example by completely ignoring the screening effect of clustered skyscrapers in some city areas. Also, there is a discrepancy in the minimum

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	field strength stated to provide usable coverage in urban areas (NB, the standard figure calculated for suburban environments has been used universally up to now for SSDAB, even in the biggest cities e.g. London). Further, no allowance for manmade electrical noise is included in the usable field strengths, and this can also cause significant coverage shortfalls in modern city areas where LED lighting and numerous other devices with external power supplies (which are prone to radiate interference) are densely deployed. Now that the baseline of demand and viable multiplexes has become clear, and the reuse pattern for DAB frequency blocks is established, a degree of flexibility on the 40% limit is welcome, particularly in situations where small scale multiplexes may not actually be audible in places where the current modelling indicates that they should be. In our opinion it is highly likely that even minor changes to the interpretation of the 40% limit as predicted by the standard modelling procedures, could enable very worthwhile coverage gains within the existing coverage 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.	
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.	Yes. It is worth reiterating that radio is a very low cost medium, one that is highly trusted, and readily accessible to all. Community radio certainly has a role to play in this respect.
Question 6: Do you have any other comments to make on the proposals?	

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