

## Your response

Question	Your response
<p><b>Question 1: Do you agree with the planning principles and methodologies that we will use in our work to refine the coverage area plan for small-scale DAB?</b></p>	<p>I agree in principal as long as in areas where more than 1 Small Scale DAB is needed to replicate the geographical area of the local commercial station then it has automatic retune when moving from one SSDAB area to the next.</p>
<p><b>Question 2: Do you agree with our proposed approach to the required technical licence conditions for small-scale radio multiplex services, and the proposed amendments to the Digital Radio Technical Code?</b></p>	<p>I am concerned that as it is a requirement that all SSDAB use DAB+ and as it is only been available since 2014 and only standard in cars since 2019 then this could limit the access to listeners in each broadcast area. I think this should be left to the discretion of the mux owners</p>
<p><b>Question 3: Do you agree with Ofcom's proposed approach to setting the level of reserved capacity for C-DSP services on small-scale radio multiplex services?</b></p>	<p>I agree with the provision of reserved capacity for C-DSP providers.</p>
<p><b>Question 4: Do you agree with the factors we are proposing to take into account of in deciding the order and timescale in which Ofcom will advertise small-scale radio multiplex licences?</b></p>	<p>Yes</p>
<p><b>Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?</b></p>	<p>Yes as long as commercial station ownership opportunities are not restricted when multiple SSDAB polygon areas are required to replicate their FM transmission areas</p>
<p><b>Question 6: Do you agree with our proposed approach for assessing the ability of applicants to establish their proposed small-scale radio multiplex service?</b></p>	<p>No. We have to disagree. We feel that priority should be given to those in the market place who are currently radio owners. In the past we feel when FM licenses have come available there appears to be a lack of due diligence on the ability and deliverability of the individuals who stand behind these licence applications. The most recent example in Scotland being Ofcom's decision to award the West Central Scotland licence to what we and many others considered to be the weakest applicant with</p>

	<p>the least experience of operating a commercial station and the knowledge to launch or sustain it. This was then sold on to the highest bidder who is not delivering a true local service.</p>
<p><b>Question 7: Should Ofcom require that the studio of a C-DSP licensee be located within the coverage area of the small-scale radio multiplex service it plans to broadcast on? Please explain the reasons for your view.</b></p>	<p>Yes. These are community based services to provide something unique to that area so we feel that they must be based in the local broadcast area. These are mainly staffed by volunteers with strong local knowledge</p>
<p><b>Question 8: We propose that holders of corresponding analogue community radio and DSP licences apportion their income equally across their licences, unless there are compelling reasons why a different apportionment is reasonable. Do you agree with our suggested approach?</b></p>	<p>Yes</p>
<p><b>Question 9: Do you agree with our proposal that a prospective C-DSP service provider will be able to apply for a C-DSP licence once we have invited applications for the small-scale radio multiplex licence upon which their proposed C-DSP service is intended to be provided?</b></p>	<p>Yes</p>