

Your response

Question	Your response
<p>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?</p>	<p>No – Your plan was very well compiled – but apart from that you appear to be taking far too cautious an approach for a pro-active and potentially ground-breaking Government regulator.</p>
<p>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?</p>	<p>No – Again you are assuming too many hazards instead of ruling to eliminate them. The restrictive influence of the big groups is very clear in this process.</p>
<p>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?</p>	<p>The basic principle is good – but there are far too many loopholes which in effect heavily dilute it to the point of it losing its effectiveness.</p>
<p>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?</p>	<p>No - because taking Applications on a random geographic system penalises those who at no fault of their own find themselves at the bottom of the list. You need to take on staff or farm out parts of the process as is done on any modern business.</p>
<p>Question 5: Do you agree with our proposed approach for assessing the technical plans submitted in small-scale radio multiplex licence applications?</p>	<p>No. The proposal illustrates a number of popularly-held misconceptions of the practical aspects of RF propagation. We have submitted a separate detailed document on this matter.</p>
<p>Question 6: Do you agree with our proposed approach for assessing the ability of applicants to establish their proposed small-scale radio multiplex service?</p>	<p>Yes – but the proposal does not go far enough to protect bona fide NFP Applicants from being overwhelmed by much larger established broadcast groups.</p>
<p>Question 7: Should Ofcom require that the studio of a C-DSP licensee be located within the coverage area of the small-scale radio</p>	<p>Yes – unless the Applicant can show a good reason why Ofcom should consider an alternative. This will avoid corruption of the</p>

multiplex service it plans to broadcast on? Please explain the reasons for your view.	basic principle of localness.
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?	This precaution is unnecessary because there will be many routes to avoid such a restriction which in itself appears unwarranted.
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?	No. Because there are no time-operational requirements for a C-DSP Licence Holder this restriction is not required and results in a self-defeating circle.