

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>Yes</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>Yes</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>No, as we believe capacity reservation should also be extended to small local independent commercial stations irrespective of whether it is on a Local Dab Multiplex or not.</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>Yes</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, as this does not make it a fair playing field for Small local independent commercial stations. When considering the desirability of awarding the licence, Small local Independent commercial stations should also be accorded the same preference as the community stations.</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</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 multiplex service it plans to broadcast on? Please explain the reasons for your view.</p>	<p>1) How does Ofcom intend to monitor community stations to see whether they actually broadcast to the community and are not commercially oriented as most of the current Ethnic stations act as a commercial station?</p>

- 2) Community stations should NOT be allowed to hold both CDSP and DSP licenses in addition to their analogue licence for the same or different locations. Once a community station requests a DSP licence it should have to surrender its analogue licence. A DSP licence should only be awarded to commercial organisations.
- 3) Ofcom should require that the studio of a C-DSP licensee be located within the coverage area because:
 - Having acquired multiple C-DSP licenses the community station can simulcast its feed and thus end up having a larger coverage area than a small local Independent commercial station
 - Can make religion/ culture/faith etc the general argument to acquire C- DSP licenses
 - It is too easy to make up particular interests or characteristics in common between different locations

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?

NO. In reality this approach will never be practical as OFCOM has NO way of verifying the data provided to them. A community Station should hold either a Community analogue licence and a C-DSP licence or just a DSP licence. Having a C-DSP and DSP should not be allowed as this suggests they are both community and commercial at the same time. A community station could easily simulcast its analogue service on a C-DSP and a DSP licence making it unfair for the small Local independent commercial stations both financially and coverage area. A small local commercial station would not be allowed to have a C-DSP and a DSP license, so why discriminate against the small local Independent commercial stations.

We have been broadcasting on a Local DAB platform since its inception and to date have not managed to get any revenue from it so

	<p>why would you expect community stations to apportion their income equally across their licences when all of the income would be from the analogue station?</p>
<p>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?</p>	<p>Yes</p>