

Your response

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<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>Broadly yes, as long as flexibility exists within the framework to cater for individual coverage areas.</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>I disagree that Small-scale DAB operators should be restricted to using DAB+. A common issue with community stations is poor coverage, particularly indoors, the recent power increases are welcome but not available to all. SS-DAB is seen as a potential way of improving coverage within a community stations service area (as well as potentially serving new areas, by broadcasting on multiple SS-DAB muxs)</p> <p>DAB+ is not available on all radios right now, a quick survey around our office reveals out of 8 receivers available (including 3 in-car) only 1 car radio (mfg 2018) can receive DAB+. Potentially Ofcom are giving community stations a boost on one hand by bringing the DAB platform within reach, but then crippling them by forcing listeners to upgrade to newer equipment. Perhaps Ofcom should survey themselves percentage of listeners with access to DAB+ receivers as this seems to me to be a key point. There is talk of equipment upgrade but many modern cars have the radio built in, there is no way to simply 'upgrade' it. I propose to allow SS-DAB operators to choose for themselves which standard to use.</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>Broadly I have no objections to the requirement of capacity reservation for C-DSP services. However I would reiterate that these services should be allowed to operate in either DAB or DAB+ rather than being forced to adopt the latter. If Ofcom will not consider allowing a SS-DAB operator control over whether to use DAB or DAB+ perhaps Ofcom would allow this choice for the minimum C-DSP services, so that community stations get the best coverage and compatibility possible.</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>I agree that the process should be as efficient and quick as possible.</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>yes, however I think the requirement to work with the other multiplex operators needs some flexibility as this could introduce significant delays particularly points like "evidence of agreement on ACI issues with other radio multiplex licensees" this could be managed by a deadline system where by information etc is passed to other licensees to comment or object within a reasonable time frame. If no response is received, then the presumption would be no objection. I think this is required as other licensees could significantly delay the launch of any SS-DAB services by ignoring, refusing to reply or co-operate.</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>broadly yes. I think the financial viability of the operator is key to ensure that the small scale multiplex is able to maintain a stable and reliable service during the license term.</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>I don't think Ofcom should stipulate that C-DSP licensee should be in the coverage area of the SS-DAB mux. Due to local coverage constraints and the method of carving up areas a community station may need (or desire) to broadcast on more than one SS-DAB mux in order to provide coverage equal to their FM coverage. If the SS-DAB mux was low on capacity an additional element could be priority for a C-DSP licensee located within the coverage area of their chosen SS-DAB mux over a C-DSP licensee who is not located within the coverage area.</p>
<p>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?</p>	<p>No comment</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</p>	<p>Yes this approach seems reasonable.</p>

have invited applications for the small-scale radio multiplex licence upon which their proposed C-DSP service is intended to be provided?