

## 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>Yes, the planning principles and methodologies appear sensible.</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>Yes, the proposed approach to the technical conditions for Small-Scale DAB licensing appears sensible.</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>The proposed approach to setting the level of capacity reserved for C-DSP services appears generally sensible. However, as is stated in paragraph 4.24 of the consultation, "the results of the 2018 call for expressions of interest may be a little outdated by the time we are able to invite applications". As one of the smaller polygon areas, invitations to apply for the Winchester multiplex might well be issued later, rather than sooner, in which case it is more likely that additional interest in C-DSP licences might have arisen, as a result of increased publicity about Small-Scale DAB.</p> <p>In paragraph 4.25 of the consultation document, it states that "Ofcom propose to take into account [...] any additional information we have on the likely demand from such services". It would appear sensible that Ofcom provide an opportunity for further expressions of interest in C-DSP licences on specific multiplexes to be registered from the time they respond to this consultation, or shortly thereafter. Contrary to the statement in paragraph 4.24, it does not appear to be "administratively burdensome" to open a specific email address to which such expressions of interest could be sent. All that would then be needed would be for the additional expressions of interest sent to this email address to be taken into account at the</p>

	<p>same time as the existing expressions of interest and other factors when Ofcom set the reservation level prior to advertising the multiplex licence.</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, the factors proposed seem reasonable.</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, the proposed approach for assessing technical plans seems reasonable. However, we have some concerns about the viability of expecting community radio stations to produce such a detailed technical plan prior to being awarded the licence. The level of information required (which is much more detailed than in the case of FM community radio licensing), and the strong implication that spectrum planning is to be undertaken using a specific commercial tool, is likely to mean that many existing or prospective community radio stations are unable to submit an application to operate a licence, despite the Community Radio Order stating the desirability of awarding multiplex licences to prospective C-DSP licensees, or consortia including a C-DSP licensee.</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>Yes, this approach seems sensible.</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>In general, yes, because of the requirement for a C-DSP licensee to deliver social gain to the community it serves, including involvement in the service by members of that community. It is difficult to see how these objectives can be achieved if the studio is remote from the intended audience.</p> <p>That said, where the target community straddles adjacent multiplexes, there might be legitimate reasons for a community radio service to be simulcast on adjacent multiplexes from a single studio that is located in one of those multiplex areas.</p>
<p><b>Question 8: We propose that holders of corresponding analogue community radio and DSP licences apportion their income equally</b></p>	<p>This approach seems appropriate.</p>

across their licences, unless there are compelling reasons why a different apportionment is reasonable. Do you agree with our suggested approach?

**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?**

As a C-DSP licence states the multiplex on which it is to be used, the benefit of obtaining such a licence prior to that multiplex licence being awarded is far from obvious.

The wording of paragraphs 7.3 to 7.9 of the consultation implies that Ofcom is concerned about its ability to process applications for C-DSP licences in a timely fashion if it waits until a multiplex has been awarded before inviting applications for C-DSP licences to broadcast on it; these paragraphs could almost be read as an encouragement to prospective D-DSP licensees to get their applications in quickly to avoid being locked out.

There is an application fee of £250 and an annual licence fee of £100, payable irrespective of whether the service is being broadcast. Ofcom (or perhaps the Treasury) would, therefore, appear to benefit financially from early applications for C-DSP licences, whilst the licensee could end up with a licence that is not usable.

It would appear more sensible to only allow applications for C-DSP licences AFTER the corresponding multiplex has been awarded. This would allow applicants to be certain that there was a multiplex on which they could use their licence and, at the same time, allow Ofcom to focus its C-DSP licensing activities on applicants that stand a chance of making it to air.

Given that it will take a number of months to launch the multiplex (with operators being given 18 months to launch their service), it does not seem unreasonable to expect Ofcom to have been able to award the appropriate C-DSP licences that were submitted reasonably promptly after the award of the multiplex licence before said multiplex is launched.

Exceptions might need to be made in the case of the existing trial multiplexes where, clearly, the launch timescales will be much shorter.