
Small-scale radio multiplex licence

Application form – Part A (public)

Name of applicant (i.e. the body corporate that will hold the licence):

BRIGHTON & HOVE DIGITAL RADIO CIC

Multiplex licence area being applied for (note this must be a small-scale multiplex area *currently being advertised* by Ofcom):

BRIGHTON - SOUTH EAST ENGLAND MACRO AREA

APPLICATION FORM:

Publication date: 30 March 2023

1. Overview

Low-cost digital radio broadcasting technology was pioneered in Brighton & Hove over the last decade. The Co-founders of Brighton & Hove Digital Radio CIC, operating the 'Trial Brighton' multiplex, intend to apply for the advertised small-scale multiplex for Brighton and Hove. The plan is to upgrade the coverage across our unique city after consultation with key stakeholders and enhance reception for citizens and consumers within our unique city.

Brighton & Hove Digital Radio CIC proposes to offer radio transmission for up to 26 existing and new radio services. The company is asset locked to ensure that it will never be sold out to corporate media operators - and cost oriented to ensure that prices remain affordable and sustainable, with any surplus reinvested into maintaining and improving digital radio in the city.

The proposed service will offer enhanced coverage to the surrounding East and West of the city and is expected to be on air within ten months of a successful application and licence award. The existing 'trial' service has been running since 2015, broadcasting up to 25 local radio services to Brighton & Hove. An allocation of free carriage will be made available to qualifying C-DSP licenced community radio services expected to also include: Platform B, Gaydio, 1BTN, Radio Reverb, Slack City Radio & University Radio Falmer - all of whom are participating in the new venture.

Brighton & Hove Digital Radio CIC, a not-for-profit Community Interest Company, will be financed with loans from OpenDAB Brighton & Hove CIC, Total Sense Media - who operate commercial local radio stations across the Sussex region and also community broadcasters Platform B Ltd and Gaydio Brighton Ltd.



Brighton & Hove
Digital Radio

2. Extent of proposed coverage area

About this section

Under section 51(2)(a) of the 1996 Act, we are required to consider the extent of the coverage area an applicant proposes to achieve within the area which has been advertised. This section therefore asks you to describe the coverage you are proposing to achieve. Further questions on the detailed technical arrangements for the proposed service, including questions on the transmission site(s) that you intend to use and your plans for how the multiplexing and distribution of your service will be arranged are contained in Part B of the application form.

Before completing this section of the form, you should read carefully the notes on 'Extent of proposed coverage area' in Section 4 of Ofcom's [guidance notes for licence applicants and licensees](#).

Applicants should note there are confidential questions relating to extent of coverage area in Part B of the application form.

- 2.1 Please provide a summary, fully consistent with the more detailed information about transmission sites supplied separately in Part B, of the coverage area proposed to be achieved by your technical plan. This should include a description of the target area you are seeking to serve within the advertised licence area, and also any areas you are aiming to serve outside the advertised licence area for this small-scale radio multiplex service. (You may refer to your coverage prediction in the response you provide):

Brighton & Hove is a diverse city on the South Coast that is home to around 277,000 people. It is situated on the southern edge of the South Downs, a range of chalk hills that stretch across Sussex and Hampshire and encompasses an area of approximately 82 square kilometres.

The current trial service operated by the co-founders of Brighton & Hove Digital Radio CIC for over 8 years was designed to serve central Brighton while the advertised area encompasses the whole city of Brighton & Hove.

The Brighton polygon is surrounded by three neighbouring polygon areas; South West Sussex, Haywards Heath & Uckfield and Eastbourne, Newhaven & Lewes. Brighton & Hove Digital Radio CIC proposes to deliver DAB digital radio to 89.4% of the population with a financially viable and sustainable network of with three transmitters as follows:

Sussex Heights, a residential tower block at St. Margaret's Place Brighton BN1 2FQ
- to serve the city centre and surrounding areas.

Brighton Race Course at Freshfield Rd, Brighton, Brighton and Hove, Brighton BN2 9XZ
- to serve the east and north east of the city.

Milford Court, a residential tower block at Brighton Rd, Lancing BN15 8RN
- enhancing coverage to the west including the A27, a major road that rings the city.

The proposed SFN will offer robust coverage to a much wider area than the existing trial including Lancing, Shoreham and Portslade to the west, Kemptown and Whitehawk to the east, Preston Park and Moulsecoomb to the north east. If awarded the Brighton radio multiplex licence, Brighton & Hove Digital Radio CIC would aim to explore additional fillers once established with appropriate reserves accumulated or alternative routes to funding opened to address the unserved areas on the fringes of the polygon. A number of television relays scattered across the polygon area are an indication of the undulating terrain from east to west and to the north east of the city. To this end, potential future sites at Falmer and Hollingbury have already been identified.

The following table summarises the extent of the predicted coverage in the current plan:

	Adults 15+	Percentage
Advertised area population:	302,227	100%
Predicted coverage inside polygon:	270,376	89.4%
Predicted coverage outside polygon:	1,270	0.4%
Local DAB Multiplex: LRMS Sussex:	1,344,906	100%
Predicted coverage inside LRMS:	271,646	20.2%

Co-block protected areas

This service would be compliant because it would not cause interference above 38 dB μ V/m to small-scale DAB areas outside of the macro area.

If required, Ofcom can be provided with a 38 dB μ V/m coverage prediction.

International

The project technical partner (digris Ltd) has carried out an assessment of the cumulative interfering field strength from our proposed network, into other administrations. This was conducted with the power sum method using ITU-R Rec P.1546-2 with a terrain model at 50% locations, 1% time, 10m above ground level.

Digris Ltd has selected directional antennas for all sites, which can further mitigate outgoing interference. Brighton & Hove Digital Radio CIC is in a strong position to revise the details of the technical plan should more stringent restrictions result from the international coordination process.

Potential for hole-punching

The Brighton polygon is within the London and the South East macro area. As frequency separation from other multiplexes is not yet known, caution has been exercised in the choice of site locations, antenna designs and power levels.

digris Ltd has produced a new 'dual sector' antenna design for the Sussex Heights site to improve upon the Trial Brighton coverage without increasing the ERP. This site has been used for the first trial multiplex for the past eight years at the same power that is being applied for. The proposed modification to the existing antenna beamwidth is highly unlikely to result in any ACI.

The first of two low-power micro-sites, Brighton Race Course, is itself intended to repair ACI caused to the coverage of Trial Brighton from Arqiva's DAB transmitters at Whitehawk Hill. The other micro-site in Lancing would employ a careful antenna design and a cautiously low power level. The 'gap-filler' equipment provided by digris is also multi-block capable and can also provide ACI repair of any affected services in the highly unlikely event of any significant blocking problem.

A desktop assessment suggests that the likelihood of ACI is very low, but a further, more detailed assessment will be carried out once the frequency relationship is known.

Population covered

Technical partner (digris Ltd) has also made it financially viable to improve the coverage to the west of the polygon through the proposal of a new low-cost 'micro-site' solution. The Lancing low-power site backfills the coverage towards the city and contributes service to just under 40,000 adults.

Brighton Race Course is chosen for one micro-site (which is used for FM by three of the community radio participants) as it will repair incoming 'hole punching' which the current trial multiplex suffers from in the area around the Whitehawk Hill Arqiva transmitter site, which has a total DAB power output of 4.5kW. This would enable coverage for the first time to Whitehawk (in East Brighton), an area where 72% of households were considered to be deprived in at least one dimension (education, employment, health or housing) according to the 2021 census.

It is a core technical objective to minimise overspill outside the polygon area and any interference with the neighbouring multiplexes in the surrounding areas. With the experience of providing the UK's first licenced trial small scale DAB service in Brighton since 2015 and technical partner digris' well documented expertise, there is a high degree of confidence that the proposed SFN can deliver the outlined technical plan.

Conclusion

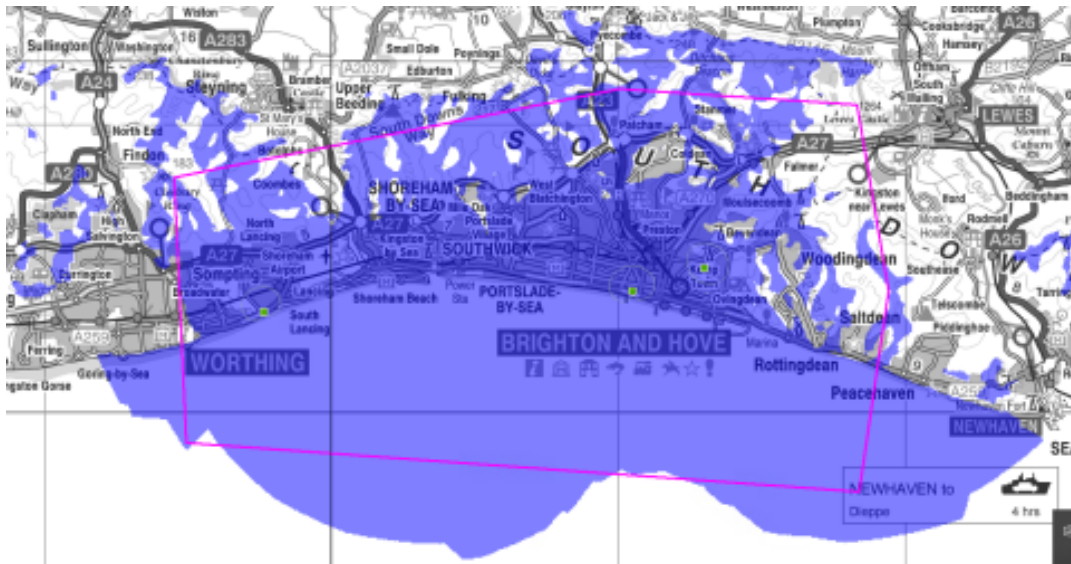
Predicted coverage reaches 270,376 adults (89.4%) inside the Brighton polygon. Overspill has been constrained to just 0.4%.

The plan affords flexibility in case of any necessary ACI mitigation or restrictions required by Ofcom due to spectrum re-use or international clearance matters.

2.2 Please provide summary details of the sites required to achieve this coverage by completing the table below (add additional rows as required):

Site name	NGR	Antenna height (m agl)	Antenna type proposed with bearing	New or existing antenna	ERP (W)
Sussex Heights	TQ3049104194	106	2 x cardioid on 330 degrees and 20 degrees ETN	New	100
Lancing	TQ1764303457	35	2 tiers, cardioid on 340 degrees ETN	New	20
Brighton Race Course	TQ33000499	20	Dipole with pole reflector on 40 degrees ETN	New	15

- 2.3 Please provide below a coverage prediction map for the whole transmitter network you are proposing to build within 18 months if you are awarded a licence. The map should show the 63 dB μ V/m field strength and the advertised small-scale DAB licence area contour. [Small-scale DAB licence areas in GIS format](#) are available on the [Ofcom website](#). In the interests of transparency, you **must** embed an inline map image within this form (even if you also submit a map as a separate supporting file).



Predicted Coverage (63dBuV/m) - OpenDAB Brighton & Hove C.I.C

digris

2.4 Please provide the following details of the prediction software used for your coverage assessments:

Provide the name and version of the prediction tool used.	HTZ Communications Version 23.3 release 1488
Detail the terrain model used by the software and its resolution.	ATDI SRTM 2003 30 x 30 spatial sampling
Detail the ground cover (clutter) data used by the software and its resolution.	ATDI 50m precision Extracted from satellite photography 1999-2001
What propagation algorithm has been used?	Deygout 94-2 with coarse integration Fresnel Zone fraction 0.8 Rec P.1546-2 at 50% locations, 1% time, 10m above ground level.
Where multiple sites are proposed, describe what methodology has been used to assess the network (SFN) gain	Power sum and the Simple Multiplication Method (SMM) for international considerations
If these predictions have not used Ofcom-provided population data, state what population data has been used and its source.	2011 Census
Have your predictions been generated by a commercial organisation? If so, by whom?	Rash Mustapha digris Ltd

3. Ability to establish the proposed service

Applicant's details

3.1 Name of applicant (i.e. the body corporate that will hold the licence):

BRIGHTON & HOVE DIGITAL RADIO CIC

3.2 Company registration number stated on Companies House (if applicable):

14823245

3.3 For UK registered companies, the address of the applicant's registered office stated on Companies House. For non-UK registered companies, the principal office address:

11 Old Steine
Brighton
BN1 1EJ

3.4 If a UK registered company, is the **current** Memorandum and Articles of Association document available on the Companies House website?

Yes

If no, please submit the up-to-date document and indicate you have done so in the checklist in Section 7 of Part B of the application form.

Ownership and control of company which will hold the licence

Details of officers

3.5 Please complete the following table, expanding it if necessary, to provide the following details for each director or designated member of the applicant (i.e. the body corporate that will hold the licence):

Full name of individual	Correspondence address ¹	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Daniel Nathan	11 Old Steine, Brighton BN1 1EJ	UK	Directorships: Brighton & Hove Radio Ltd; Festival Online Ltd; Festival Productions Ltd; Platform B Ltd; OpenDAB Brighton & Hove CIC; OpenDAB CIC (Radio broadcasting)	none

¹ This should be the same address as is held and published by Companies House.

			Old Court House Residents Ltd; Parochial Mews & Flats Courtyard Ltd <i>(Residents property management)</i> Valley Gardens Forum CIC <i>(Professional membership activities)</i> Hopshire Investments <i>(Real estate lettings)</i> Langham Trading Ltd <i>(Textile agents)</i> East Sussex Digital Radio Ltd; Hastings Digital Radio CIC; Digital Radio West Sussex Ltd; South Of The River Digital Radio Ltd <i>(SSDAB Multiplex Applicants)</i>	
Ian Wallace	1a Manchester One, 53 Portland Street, Manchester M1 3LF	UK	Directorships: Gaydio Digital Ltd; Gaydio Brighton Ltd; Gaydio Community Interest Company <i>(Radio broadcasting)</i> St Wilfrids Management Company Ltd <i>(Residents property management)</i> Derby DAB Ltd; North London Digital Ltd <i>(SSDAB Multiplex Applicants)</i>	none
Allan Moulds	11 Old Steine, Brighton BN1 1EJ	UK	Directorships: Arrow FM Ltd; Bright FM Ltd; Isle Of Wight Radio Ltd; Media Sound Ltd; Sovereign FM Ltd; Splash FM Ltd; Total Sense Media Ltd <i>(Radio Broadcasting)</i> Sussex Living Ltd <i>(Printing not elsewhere classified)</i> The Letting People Ltd <i>(Real Estate Agencies)</i>	none

			Beacon Media Ltd <i>(Other business support service not classified)</i> Hexad Property Ltd; Old Wesleyan Chapel Freehold Ltd <i>(Development of building projects)</i> EJA Holiday Property Ltd <i>(Other holiday & collective accommodation)</i> East Sussex Digital Radio Ltd; Hastings Digital Radio CIC; Digital Radio West Sussex Ltd <i>(SSDAB Multiplex Applicants)</i>	
Rash Mustapha	11 Old Steine, Brighton BN1 1EJ	UK	<u>Directorships:</u> digris Ltd <i>(DAB Transmission)</i> OpenDAB CIC; OpenDAB Brighton & Hove CIC <i>(Radio Broadcasting)</i> East Sussex Digital Radio Ltd; Hastings Digital Radio CIC; Derby DAB Ltd; MK Digital Media Ltd <i>(SSDAB Multiplex Applicants)</i>	CTO of digris Ltd
Natalie Spada	11 Old Steine, Brighton BN1 1EJ	UK	<u>Directorships</u> Platform B Ltd <i>(Radio Broadcasting)</i>	Project director

Details of participants

3.6 Please complete the table overleaf, expanding it if necessary, to list all bodies or individuals which hold or are beneficially entitled to shares, or who possess voting powers, in the applicant (i.e. the “participants”). If you are unable to provide a complete answer to this question in relation to beneficial owners, please state whether you have any reason to suspect the existence of any beneficial owners.

(If parts of this question are not applicable to the applicant – for example, because the applicant does not have shareholders – please respond “N/A” in the relevant parts of the table.)

Full name of participant (existing and proposed)	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Alias Music & Community Projects CIC	5	£5.00	5	5
Gaydio Brighton Ltd	10	£10.00	10	10
OpenDAB Brighton & Hove CIC	51	£51.00	51	51
Platform B Ltd	10	£10.00	10	10
Radioreverb Ltd	5	£5.00	5	5
Total Sense Media Ltd	14	£14.00	14	14
University Of Sussex Students' Union	5	£5.00	5	5
<u>Comments:</u> 86% of shares are held by not-for-profit community radio broadcasters or community interest companies based in the coverage area. This bid is constructed in isolation in relation to company structure and share allocations. If our consortium is awarded the multiplex licence and any participants in this bid also involved in one covering a contiguous area, it is understood that the ownership structure may need to be adjusted in order to comply with legislation.				

Details of relationships of control

- 3.7 Complete the following table, expanding it if necessary, to list any bodies corporate which are controlled *by* the applicant (or any director of the applicant, any person/body corporate with control over the applicant, or any body corporate controlled by a person/body corporate controlling the applicant). Please include bodies corporate under joint control – i.e. which are controlled acting together in concert with third parties (e.g. because of a shareholder's agreement):

(If this question is not applicable to the applicant please respond "N/A" in the table.)

Full name of body corporate	Address	Person/body controlling the entity (i.e. the applicant itself or its associate)
Brighton & Hove Radio Ltd (All shares owned by OpenDAB Brighton & Hove CIC)	11 Old Steine Brighton, BN1 1EJ	OpenDAB Brighton & Hove CIC (No PSC)

Details of persons who control the applicant

- 3.8 Complete the table overleaf, expanding it if necessary, to list all persons/bodies corporate who control the applicant, or control any person/body corporate with control over the applicant. Please include persons or bodies that control the applicant (or body corporate with control over the applicant) jointly i.e. acting together in concert with third parties (e.g. because of a shareholder's agreement). Please note that some of this information may repeat information provided above on shareholders and other participants in the applicant:
- (If this question is not applicable to the applicant please respond "N/A" in the table.)

Full name of person/body corporate	Address	Person/body controlled by the entity (i.e. the applicant itself or its associate)
OpenDAB Brighton & Hove CIC (No PSC)	11 Old Steine Brighton, BN1 1EJ	Brighton & Hove Digital Radio CIC

- 3.9 Complete the following table, expanding it if necessary, to list other bodies in which any individual listed in response to question 3.8 is a director or designated member:
- (If this question is not applicable to the applicant please respond "N/A" in the table.)

Full name of individual	Name of body in which individual is a director or designated member
Daniel Nathan - Director	OpenDAB Brighton & Hove CIC
Rashid Mustapha - Director	OpenDAB Brighton & Hove CIC

- 3.10 Complete the following table, expanding it if necessary, to list all bodies corporate which are controlled (including jointly controlled) by any body corporate listed in response to question 3.8:
- (If this question is not applicable to the applicant please respond "N/A" in the table.)

Full name of body corporate listed in 3.8	Body corporate controlled
OpenDAB Brighton & Hove CIC	Brighton & Hove Radio Ltd
OpenDAB Brighton & Hove CIC	Brighton & Hove Digital Radio CIC

- 3.11 In relation to each body corporate identified in response to question 3.8, complete the table overleaf, expanding it if necessary, to list all bodies which hold or are beneficially entitled to shares, or who possess voting powers, in the body corporate concerned (i.e. “participants”). You may, but are not required to, exclude from this table any bodies listed in response to question 3.8. If you are unable to provide a complete answer to this question in relation to beneficial owners, please state whether you have any reason to suspect the existence of any beneficial owners.

(If this question is not applicable to the applicant please respond “N/A” in the table.)

Name of body corporate identified in response to question 3.8				
Full name of participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
N/A				

Involvement of the applicant in specified activities

- 3.12 Please state below whether the applicant, or any individual or body corporate identified in questions 3.5 to 3.11 is, or is involved in, any of the below, and the extent of that interest.

Activity/involvement	Yes or No	Please state who is involved; the name of the body/individual/agency they are involved with; and the extent of their involvement
A local authority	No	
A body whose objects are wholly or mainly of a political nature, or which is affiliated to such a body	No	
A body whose objects are wholly or mainly of a religious nature; ²	No	

² Please refer to sections 3 to 5 of Ofcom’s [religious guidance note](#) for details on how we determine the eligibility of religious bodies to hold certain broadcasting licences.

An individual who is an officer of a body falling within (b) or (c);	No	
A body corporate which is an associate (as defined in paragraphs 1(1) and 1(1A) of Part I of Schedule 2 to the Broadcasting Act 1990) of a body falling within (b) or (c);	No	
An advertising agency or an associate of an advertising agency	No	

Details of applications, licences and sanctions

3.13 Please answer 'yes' or 'no' to the following questions about the applicant (i.e. the body corporate that will hold the licence):

a) Is the applicant a current licensee of Ofcom?

No

b) Has the applicant ever held an Ofcom broadcasting licence before?

No

c) Has anyone involved in the proposed service held an Ofcom broadcasting licence or been involved in an Ofcom-licensed broadcast service before?

Yes

d) Does the applicant control an existing Ofcom licensee?

No

e) Is the applicant controlled by an existing licensee or by any person who is connected (within the meaning of Schedule 2 to the Broadcasting Act 1990) with an existing licensee (i.e. as a "participant")?

Yes

f) Has the applicant – or any person(s) controlling the applicant - made any other application to Ofcom (or its predecessor broadcast regulators – the Independent Television Commission and the Radio Authority) for any licence which has since been surrendered by the licensee or revoked by Ofcom (or one of its predecessor regulators)?

No

- g) Has the applicant – or any person(s) controlling the applicant - made any other application to Ofcom (or its predecessor broadcast regulators – the Independent Television Commission and the Radio Authority) for any licence which has since been surrendered by the licensee or revoked by Ofcom (or one of its predecessor regulators)?

No

- h) Is the applicant – or any person(s) controlling the applicant – subject to any current or pending investigation by any statutory regulatory or government body in the United Kingdom or abroad in respect of any broadcast-related matter?

No

- i) Has the applicant – or any person(s) controlling the applicant – ever been subject to a statutory sanction for contravening a condition of a broadcasting licence in the UK or any other jurisdiction?

No

- 3.14 If the response to any of the questions (a) to (i) in 3.13 above is 'yes', please provide the details, expanding the table where necessary:

	Licence number(s) (if known)	Details
(a)		
(b)		
(c)	DP000075BA/7 CR101283BA/1 DSP000067 CR000186BA/2 AL100104BA/2 AL103882BA/1 AL000211BA/6 DP102388BA/1 AL100708BA/2 AL100761BA/3 AL000263BA/3 DP102388BA/1 AL100286BA/4 CR101275BA/1	10-fi.com (aka Test MCR) Gaydio Brighton Gaydio (London, Manchester, Brighton) Gaydio Manchester Isle Of Wight Radio Isle Of Wight Radio Juice 107.2 Brighton More Radio More Radio Eastbourne More Radio Hastings More Radio Mid-Sussex More Radio Retro More Radio Worthing Platform B

	DP102703BA/1 DP101070BA/1 SSDABWT012 DP101318BA/1	Platform B DAB Slack City Radio (formerly totallyradio) 'Trial Brighton' Multiplex University Radio Falmer
(d)		
(e)	Manchester MUX DS104327 (shareholder, lender and director from July 2023) 10-fi.com (aka Test MCR) DP000075BA/7 (owned by Brighton & Hove Radio Ltd)	OpenDAB Brighton & Hove CIC
(f)		
(g)		
(h)		
(i)		

- 3.15 Please provide any further information you hold, relating to the past conduct of the applicant or those individuals listed, in regulatory matters or in matters going to honesty and/or compliance, which may be relevant to Ofcom's consideration of whether or not the applicant is fit and proper to hold a broadcast licence. If the applicant or the form signatory fails without reasonable excuse at this point to declare any matter of which Ofcom subsequently becomes aware, and which we consider to be relevant to the applicant's eligibility to hold a licence, we will take it into account in determining the question of whether the applicant/licensee remains fit and proper to hold a licence.

If you have no information to provide, please respond "N/A".

N/A

- 3.16 Has the applicant – or any person(s) controlling the applicant – ever been convicted of an unlicensed broadcasting offence?

No

If yes, please provide the following details:

Full name	Date of conviction/action (dd/mm/yy)	Penalty
N/A	N/A	N/A

Financial and business plan

- 3.17 Please provide a high-level estimate of the costs you believe will be required to establish the multiplex service.

Costs assessment

The proposed coverage is to serve 89.4% of the city's population and as far as possible to replicate the coverage achieved by four existing Ofcom community radio services broadcasting on FM to Brighton & Hove. This will be achieved with a three-transmitter network with a single principal city centre site as successfully deployed during the trial licence period. In addition, two filler transmitters will be sited to ensure enhanced coverage to the north and east of the city, where topography compromises the main site. Each transmitter overlaps to a small extent with the other two. In the event of a failure at one site, the multiplex can continue to broadcast with reduced coverage until full service is restored. Our technical partner, digris, holds spares at its UK operations centre in Hove, which is located within the coverage area.

The largest set up cost relates to the purchase and installation of equipment by contracted qualified engineers and riggers. The assessment begins with the coverage objective and what is required to achieve this. The approach taken with multiplex operation and maintenance also has a bearing on costs.

Capital costs

Network planning and procurement of core equipment including, uninterruptible power supply, fully integrated transmitter, RF mask filter, antennas, feeder cables, mountings, other ancillary equipment and other costs such as rack cabinets, router/firewalls, monitoring and wireless links together with installation at an existing single primary and two new filler sites.

- Estimated pre-operational capital costs: £35,000

Other costs

Pre-operational costs will also include legal and professional advice drawing up contracts with site owners and service providers as well as decommissioning the existing Trial Brighton equipment as it nears end-of-life. Pre-existing contractual relationships with two out of three proposed site providers and the majority of proposed DSP and C-DSP broadcast radio services on the proposed new Brighton multiplex developed during the operation of the Trial Brighton multiplex since 2015 are expected to lessen the administrative burden required in setting up new contracts with Brighton & Hove Digital Radio CIC.

- Estimated pre-operational costs: £2,000

- Estimated total establishment cost: £37,000

Annual operating/running costs include - site rent, power consumed, connectivity, technical and other support, encoder and multiplexer management, contract maintenance, ongoing legal & professional services, licencing and insurance:

- Estimated total operating cost: £ 28,500 per annum

The business model

The business plan, including the development of a rate card has been informed by real life trading conditions during the Brighton Trial. Over the course of developing small scale DAB with the Brighton Experiment in 2012 and the subsequent Trial Brighton multiplex from July 2015 and currently operated by OpenDAB Brighton and Hove CIC, a cost oriented pricing policy has been set by that project's co-directors.

This approach has delivered sufficient revenue to meet all costs of operation and a surplus to set aside for periodic upgrades plus the replacement of equipment. Affordability has had the direct and positive outcome of enabling the consistent participation of community and local commercial radio services on the Brighton Trial. In tandem with the efficient use of capacity - for example, by being the first multiplex in the UK to fully transition to DAB+ encoding, the Brighton Trial has remained consistently full with the largest number of licenced community radio services and widest program offer of any of the twelve trials awarded. This is a proven successful approach that will be replicated with the enhanced DAB service for Brighton & Hove proposed in this application.

Rather than extrapolate an abstract 'cost per thousand' potential listeners, there is real world experience of successfully 'selling' multiplex capacity to upwards of 25 services. In planning this application, the incremental costs of adding two filler relays, suitable connectivity and factored in the substantial increase in the cost of electricity to account for three sites have been considered. Regular contact and discussion with present and prospective service providers informed a proposed rate card culminating in signed Heads of Terms with 25 potential service providers and Memorandum of Understanding with 8 further stakeholder services. This gives the Directors of Brighton & Hove Digital Radio CIC the confidence to project likely operating revenues.

3.18 Please indicate how the costs outlined in 3.17 (above) will be met, under the following headings:

a) Share capital

The share capital in Brighton & Hove Digital CIC is nominal

b) Loan stock

N/A

c) Leasing/HP facilities (capital value)

N/A

d) Bank overdraft

N/A

e) Grants and donations

N/A

f) Other (please specify)

Brighton & Hove Digital Radio CIC's founding partners have agreed a funding and expenditure plan. The company can clearly demonstrate its ability to establish the proposed service.

Loans from Shareholders

Loans are committed to Brighton and Hove Digital Radio CIC by its shareholders.

The Loan schedule as per 3.19 below.

Shareholders OpenDAB Brighton & Hove CIC currently holds cash reserves of around £20,000, which has accumulated over the eight years of operating the Trial Brighton multiplex (through wholly owned subsidiary Brighton & Hove Radio Ltd) since July 2015 and is set to continue accumulating until the Trial service comes to an end.

Further, with the working assumption that Ofcom intends to manage a seamless transition from Trial Brighton to its successor, and that with contracts in place, Brighton & Hove Digital Radio CIC is projected to generate monthly cash flow of circa £3,635 pcm from day one against monthly recurrent costs of £2,375.

It is understood that with the proliferation of small scale DAB, there is likely to be some downward pressure on pricing - with syndicated services spread more thinly across new areas coming on stream. Our experience suggests that Brighton will remain one of the more attractive areas for networked services. However, in the event of the market cooling sharply - either as a result of wider market conditions or something more radio sector specific, Brighton & Hove Digital Radio CIC shareholders are committed to increase their loan commitments if required to meet an increased budget - as shown below.

OpenDAB Brighton & Hove CIC is committed to providing a loan to the company of up to £30,000. Total Sense Media Ltd has additionally agreed to provide loans of up to £10,000 and C-DSP providers Gaydio Brighton Ltd and Platform B Ltd have agreed to provide loans of up to £3,000 each.

Lender	Shareholding	Amount
Gaydio Brighton Ltd	10%	£3,000
OpenDAB Brighton & Hove CIC	51%	£30,000
Platform B Ltd	10%	£3,000
Total Sense Media Ltd	14%	£10,000

- 3.19 Expanding the table if necessary, please list the providers of the funding which will be used to establish the service, and the amount of funding that each will provide. For incorporated investing shareholders, please provide a copy of the most recent statutory accounts if they are not currently available on Companies House.

Name of shareholder or investor	Percentage of shares held (if applicable)	Amount of funding provided (£)
Gaydio Brighton Ltd	10%	£3,000
OpenDAB Brighton & Hove CIC	51%	£30,000
Platform B Ltd	10%	£3,000
Total Sense Media Ltd	14%	£10,000

- 3.20 All of the funding identified above should be confirmed. If any funding has not been confirmed, or if there are any pre-conditions before the funding is released which have not yet been met, provide an explanation of what needs to be done, the dates by which it needs to be carried out, and any steps the applicant needs to take to ensure the funding is confirmed and/or released.

All funding identified above is confirmed and agreed with a signed Memorandum of Understanding between Brighton & Hove Digital Radio CIC and each partner.

Each lender has agreed to provide to Ofcom, as required, evidence that they have adequate funds to lend the amounts set out above. **Please refer to Annex 10.**

Each lender has agreed to lend the prescribed amounts in the event of receipt of formal notice of award of licence from Ofcom.

Relevant expertise and experience

- 3.21 Please provide details of who will be responsible for the day-to-day general management of the multiplex service (for example, dealing with programme service providers and contractual matters). Please also briefly state their previous relevant experience.

(Note that any individuals or contractors who cannot be identified at this stage can instead be included in the confidential section (Part B) of the application form.)

Five directors, four based in Brighton & Hove, bring together a unique combined skill set with demonstrable know-how and capabilities to oversee the successful launch and operation of this proposed service - underpinned by technical partner digris.

Daniel Nathan

Daniel is a radio entrepreneur, producer and pioneer of new radio formats and platforms. Co-founder of the UK's first licenced 'alternative' format station, Festival Radio, with an initial trial licence issued by the Home office, Daniel subsequently founded Festival Productions, becoming one of the first independent radio producers at the BBC. A launch consultant for Kiss 100 in London, Daniel was subsequently co-founder of Kiss 102 in Manchester and Kiss 105 in Yorkshire. He was the founder of Juice 107.2 in Brighton, launched in 1998. He is co-founder of Platform B, a not for profit 'next generation' youth community radio project in Brighton from 2018, broadcasting to the city on FM & DAB radio and its older digital only sibling Slack City Radio.

Daniel was a key contributor to the launch of UK Radioplayer in 2011 and served on their Technical Steering Group.

He led 'Radio Connected', a Technology Strategy Board funded development project examining radio metadata and connected device technology working with Imagination Technologies PLC, Radioplayer/University of Westminster and Mixcloud. This led to the development of 'Radio Exchange', a production tool to 'upload once and distribute everywhere' in partnership with the Community Media Association. In 2014, he co-authored a National Radio Archive feasibility study for the British Library.

Daniel launched the UK's first Trial Small Scale DAB 'multiplex' in July 2015 following an experimental project three years earlier. He is a founder director of OpenDAB, a Community Interest Company that has at its heart the development of small-scale DAB for community and local radio. In June 2022, Ofcom, awarded a full time digital radio multiplex licence for Greater Manchester to a community lead consortium co-ordinated by the OpenDAB CIC initiative - which will launch with twenty six programme services in June 2023. An industry visionary, Daniel's skills of applying technology, project management, creative content production and managing day-to-day operations are honed over four decades working in radio.

Ian Wallace

A founding partner in Gaydio Community Interest Company, Ian as business director has played a key role in the creation, development, establishment and growth of the radio brand, in Manchester initially, and later throughout large parts of the UK. Today Gaydio can be heard on the London III multiplex as well as six of the ten small-scale DAB trials, including Manchester and Brighton.

Ian's field of responsibility extends throughout the operational and business side of the organisation. He has experience in resolving engineering issues, putting necessary contingencies in place and is skilled in managing the use of software, ensuring systems remain secure. Having led a sales team for eleven years, Ian is also an expert in contract negotiation. In addition to this work, Ian oversees the development of the Gaydio Academy, an activity that maintains a close connection between the radio station and the communities it serves.

Allan Moulds

Allan Moulds is the Chief Executive Officer of Total Sense Media Limited, a group that has been delivering local radio to Sussex for over twenty years.

Total Sense Media's origins date back to 2001 when its first radio station Bright FM went on-air. Following that successful launch, Allan oversaw a series of acquisitions that transformed the business into the small group it is today. Those acquisitions included: Splash FM, Sovereign Radio, Arrow FM, Isle of Wight Radio, The Beacon Magazine, Sussex Living Magazine, Magnet Magazine and Living with Disability Magazine.

Nearly all of those businesses were loss making at acquisition, and it's Allan's financial and commercial skill that is credited with merging and transforming those companies into the consistently profitable and debt free group that exists today.

Allan's entrepreneurial skills have also been key to the group developing a multimedia offering. Total Sense Media has launched several new digital and events brands, giving the group a unique and clear USP locally.

Rash Mustapha

Rash Mustapha is director and Chief Technology Officer of the UK arm of European transmission specialist digris. His work has been in two key areas - in broadcast radio engineering and in telecoms as a senior technologist and cyber security specialist. Rash has designed, installed and operated AM, FM and DAB transmission systems for a quarter of a century.

More recently he has worked in applying and integrating software design and low-cost computer technology with DAB transmission systems – commonly known in the UK as small-scale DAB. This work included extensive testing and management of a government funded trial. Recipient of a Digital Radio UK award for his contribution to the radio sector, Rash was formally recognised for his work when he was made an MBE in 2019.

digris Ltd a subsidiary of digris AG is a Swiss broadcast radio engineering company which specialises in DAB technology. digris would be contracted to manage, design, build, install and oversee the day-to-day technical operation and monitoring of the encoding, multiplexing and transmission system.

Nats Spada

Nats is a radio, digital and creative producer & musician with over 12 years' of industry experience. In 2016, she co-founded Platform B, Brighton & Hove's only youth-led radio station broadcasting on FM, DAB and online. The station is directed by a new wave of DJs, producers and presenters who are re-imagining and diversifying the medium with an eclectic mix of music and youth programming. In 2021, Nats co-founded PLatform B Next Gen VR, which with the support of Arts Council England created Brighton's first Virtual Reality music event. From 2012-2015, Nats project managed three Technology Strategy Board backed totallyradio music & radio tech research projects with industry partners including the BBC, University of Westminster, Imagination Technologies PLC and radio tech start up Mixcloud.

digris Ltd – transmission partner

The level of specialism required in SFN transmission management is fully appreciated by Brighton & Hove Digital Radio. To this end we propose to contract-out this specialism. Our preferred partner in this field is the UK arm of digris AG. digris is a newly formed UK organisation but in mainland Europe digris AG, a Swiss company, is unique in its experience in the establishment and operation of what is known in the UK as 'small-scale DAB'. Founded in 2012 digris specialises in DAB, operating networks of transmitters in Switzerland, France and the UK. It operates 40 Single Frequency Networks and over 70 DAB transmitters ranging in power from 6 Watts to 50 kW ERP (MFNs and SFNs).

digris is also a full member of WorldDAB.

- 3.22 Please provide details of who will be carrying out the installation and on-going maintenance of your multiplexing / transmitter equipment (or the name of your proposed transmission and multiplex provider if you intend to use a third-party organisation for these services). Please also briefly state their previous relevant experience. (Note that any individuals or contractors who cannot be identified at this stage can instead be included in the confidential section [Part B] of the application form.)

Function	Responsible party	Previous experience
Installation of transmission equipment	digris Ltd	digris Ltd is a UK organisation but in mainland Europe digris AG, a Swiss company, is the market leader in the establishment and operation of what is known in the UK as 'small-scale' DAB. Founded in 2012 digris specialises in DAB, operating transmitter networks in Switzerland, France and the UK. The company currently operates more than 40 multiplexes with over 70 DAB transmitters ranging in power from 6 Watts to 50 kW ERP (MFNs and SFNs) carrying more than 400 radio services.
Ongoing maintenance of the transmission equipment		
Installation of the Multiplexing equipment		
Day-to-day technical management and maintenance of the multiplexing equipment (if different from response to question 3.28 above)		

Timetable for coverage roll-out

- 3.23 Please tell us how soon after licence award you expect your multiplex service to become operational and achieve the coverage you are proposing:

Brighton & Hove Digital Radio CIC would aim to transition from the trial to full service within 10 months of award, and intends to make sure there is minimal interruption to broadcast services previously carried by Trial Brighton.

- 3.24 In addition, please provide, as an annex to be submitted with this application, an outline project plan with a timeline (e.g. a Gantt chart or similar) showing the high level activities and tasks leading up to the launch of your multiplex service.

Please see Gantt Chart **Annex 3**.

4. Involvement of C-DSP providers; demand or support from programme providers

Involvement of C-DSP providers

- 4.1 Is the applicant body proposing to provide its own C-DSP service on the multiplex?

No

- 4.2 If the answer to the above question is 'yes', please provide a name and brief details of this proposed service. If the service is already licenced by Ofcom, the licence number should be provided:

N/A

- 4.3 If the answer to the above question is 'no', please provide details of any participant in the applicant body that is proposing to provide a C-DSP service on the multiplex. In this context, a "participant" refers to a person who holds or is beneficially entitled to shares in the applicant or possesses voting power in the applicant. If the service is already licenced by Ofcom, the licence number should be provided. Please refer to the nature of the participation (e.g. shareholding or agreement in relation to voting power):

1BTN

Alias Music & Community Projects CIC (1BTN) is entitled to 5% of the company's shareholding. This service already holds a DSP licence but qualifies and intends to apply for a C-DSP licence. 1BTN's analogue service is already licenced by Ofcom: [CR101282BA/1](#)

Gaydio Brighton

Gaydio Brighton Ltd (Gaydio Brighton) is entitled to 10% of the company's shareholding. This service already holds a DSP licence but qualifies and intends to apply for a C-DSP licence. Gaydio Brighton's analogue service is already licenced by Ofcom: [CR101283BA/1](#)

Platform B + Slack City Radio

Platform B Ltd (Platform B) is entitled to 10% of the company's shareholding. This service already holds a DSP licence but qualifies and intends to apply for a C-DSP licence. Platform B's analogue and digital service is already licenced by Ofcom: [CR101275BA/1](#) + [DP102703BA/1](#)

A second service, Slack City Radio already holds a DSP licence [DP101070BA/1](#) but qualifies and intends to apply for a C-DSP licence.

Radio Reverb

Radioreverb Ltd (Radio Reverb) is entitled to 5% of the company's shareholding. Radio Reverb already holds a DSP licence but qualifies and intends to apply for a C-DSP licence. Radio Reverb's analogue service is already licenced by Ofcom: [CR000057BA/2](#)

URF

University of Sussex Students' Union (URF) is entitled to hold 5% of the company's shareholding. URF already holds a DSP licence but qualifies and intends to apply for a C-DSP licence. URF is licenced by Ofcom: [DP101318BA/1](#)

Demand or support from programme providers

- 4.4 Please provide in the table below (expanding the table if necessary) the names of providers (or prospective providers) of community or local digital sound programme services who have expressed their demand or support for the provision of the proposed multiplex service in the area to be served by the multiplex service. For reasons of transparency, the response to this question *must be answered below and should not be provided as a separate annex*. The evidence of the demand or support, such as signed heads of terms or emails, should be provided as a confidential annex, and relate only to the specific multiplex being applied for.

Service providers are either incumbent or present on the current DAB trial or have sent in their expression of interest for their service to be on the multiplex at launch or in the future. All services are either based within or around the Brighton polygon service area.

Six of these services intend to apply for C-DSP licences.

As requested, evidence of expressions of interest, heads of terms and communication with services have been provided as a separate annex. Please see **Annex 11**.

Name of service provider and station name (if known)	Proposed C-DSP or DSP	Nature of evidence of support provided
Alias Music & Community Projects CIC: 1BTN	C-DSP	MoU
Gaydio Brighton Ltd: Gaydio Brighton	C-DSP	MoU
Platform B Ltd: Platform B	C-DSP	MoU
Platform B Ltd: Slack City Radio	C-DSP	MoU
RadioReverb Ltd: Radio Reverb	C-DSP	MoU
University Radio Falmer	C-DSP	MoU

Total Sense Media Ltd: More Radio	DSP	MoU
Total Sense Media Ltd: More Radio Retro	DSP	MoU
10-fi.com	DSP	Heads of Terms
1AU Classic Hits	DSP	Heads of Terms
80s Rhythm	DSP	Heads of Terms
Angel Vintage	DSP	Heads of Terms
Atmosphere.Radio	DSP	Heads of Terms
bigbeatbrighton	DSP	Heads of Terms
Care Radio	DSP	Heads of Terms
Cosoro Radio	DSP	Heads of Terms
Decadance Brighton	DSP	Heads of Terms
Defection Radio	DSP	Expression of Interest
GlitterBeam Radio	DSP	Heads of Terms
Mi-Soul	DSP	Heads of Terms
Open Broadcast Radio	DSP	Heads of Terms
Passion Radio	DSP	Heads of Terms
Radio Caroline	DSP	Heads of Terms
Regency Radio	DSP	Heads of Terms
Resonance	DSP	Heads of Terms
Select Radio	DSP	Heads of Terms
Solar Radio	DSP	Heads of Terms
Southdown Radio	DSP	Heads of Terms
Starpoint Soul	DSP	Heads of Terms
TLC	DSP	Heads of Terms
XTRA HOT	DSP	Heads of Terms

5. Fair and effective competition

- 5.1 Please detail the measures that have already been taken, and will be taken before and during the licence period, to demonstrate that, in contracting or offering to contract with programme services providers, the applicant has acted in a manner calculated to ensure fair and effective competition in the provision of such services.

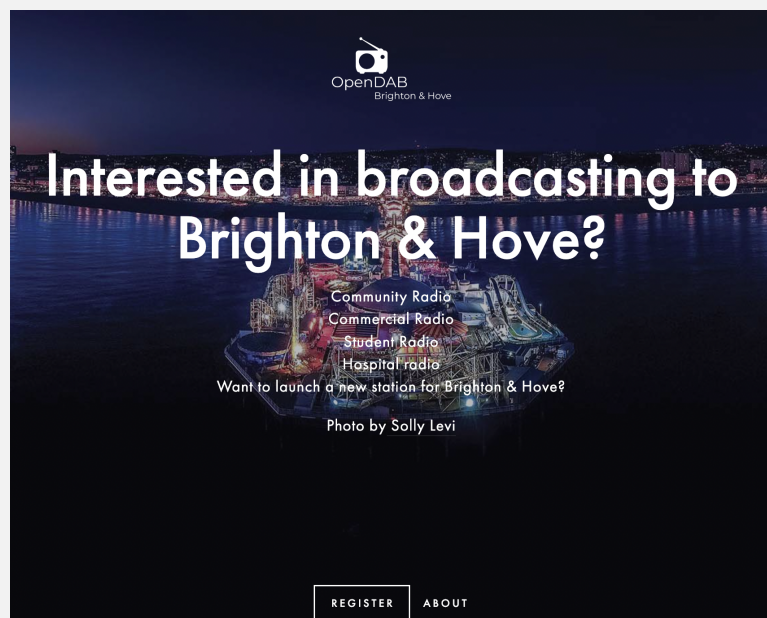
For example, how have you sought to engage a broad range of prospective service providers including those not directly involved as participants in the application and those who have decided not to proceed to express an interest or agree heads of terms at this stage, and how have you sought to make prospective service providers aware of your proposals and potential terms for carriage?

Contact before Ofcom's advertisement announcement

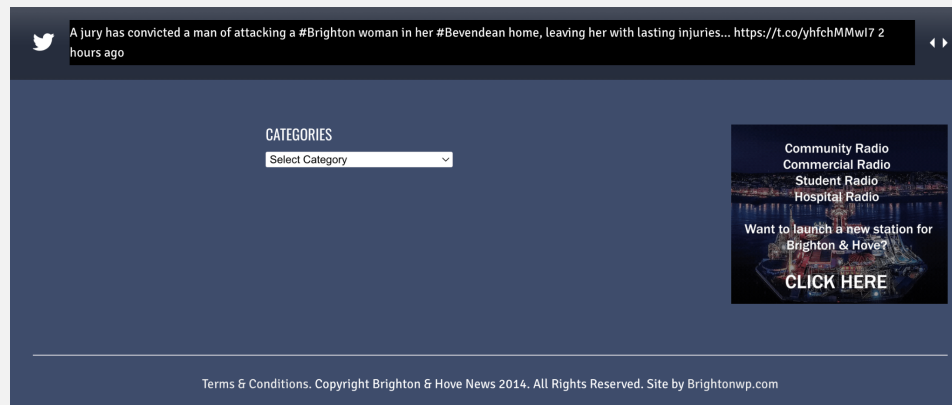
The Trial Brighton multiplex has been on air since 2015 with 25 services as at March 2023 - prospective service providers for the proposed Brighton & Hove DAB polygon area had already been advised and were anticipating the Ofcom announcement in March. The detail of our proposed trading policy and rate card was developed in consultation with all existing service providers in an open and transparent way.

Media promotion/coverage

A website was launched in early April with a press campaign and advertising to increase awareness of the bid plans for incumbents and to attract new services. brightondab.org.uk also included a registration form to compose expressions of interest.



Advertising the bid was also carried out on local publications based in the local area which led interested parties to the [brightondab.org.uk](https://www.brightondab.org.uk) website.



A press release was sent out to industry and local news publications within the polygon ahead of our intention to apply for the multiplex licence and was published online. Articles directed readers to our website to find more information on the service we aim to apply.

Prominent coverage in Radio Today on 17 April 2023 prompted further communication from existing services as well as two new prospective services.



Brighton and Hove DAB operator confirms permanent licence bid



Written By **Roy Martin**

updated on **April 17, 2023 - 9:12 pm**



The current trial small-scale DAB licence holder in Brighton and Hove has teamed up with local radio services to apply for the full-time licence.

Brighton & Hove Digital Radio, a not-for-profit Community Interest Company, will be funded by OpenDAB Brighton & Hove together with Platform B, Brighton's only youth-led radio station, Gaydio Brighton, and local commercial radio operator Total Sense Media.

Prospective services including incumbents on Trial Brighton

Trial Brighton's operator OpenDAB Brighton & Hove has invited all six qualifying prospective C-DSP community services to become participants in Brighton & Hove Digital Radio CIC with a nominal 5% equity allocated to each at no cost though a founders' Memorandum of Understanding. Additionally regional commercial radio operator Total Sense Media and two of the six prospective C-DSPs Gaydio Brighton & Platform B agreed to nominate company Directors and to lend capital in order to establish the proposed. A further 19 prospective DSP services including incumbents were approached and signed up to 'Heads of Terms' for carriage on the proposed Brighton & Hove multiplex.

Transparent trading policy

Dealings with all prospective DSP providers have been open and transparent. The Heads of Terms form is standardised with common terms and shows indicative prices for carriage whether these are free carriage costs for qualifying community radio (C-DSPs) or more modestly discounted charges for locally-based DSPs.

Following award and during the licence period

Brighton & Hove Digital Radio CIC's website will indicate transparent carriage charges and the process for applying for carriage - setting out the maximum amount chargeable to any radio station for the prescribed data rate. As set out on a Rate Card, the company will have clear objectives that relate to encouraging the transmission of services that are considered to be of relevance to members of the local community and which provide a diversity of programme content across the multiplex as a whole - with a priority given to local and not-for-profit organisations.

A trading policy for trading in a fair and competitive environment embodies four overarching thresholds and the application process will be a three-stage process.

The threshold considers localness, extent of appeal and robustness of the proposal. Applicants will be encouraged to make their case in the submission of their expressions of interest. The process includes a review of applications and a waiting list.

By adopting this structured approach, Brighton & Hove Digital Radio CIC will demonstrate fairness in a manner that will stand up to scrutiny.

Incumbent DSP services

As this application is in response to Ofcom's multiplex licence advertisement for an area already partially covered by a trial multiplex, 25 DSP services currently being carried by that trial were contacted throughout the application process. This began with calls and a standard letter to representatives of each one. The objective was to offer an early and open opportunity to consider the proposal and to discuss potential carriage in the event of a successful application by Brighton & Hove Digital Radio CIC.

Post licence award

All services that express an interest in being carried on the proposed Brighton & Hove multiplex will have access to a public rate card available at brightondab.org.uk. This is intended to ensure that everyone will have access to the same information regarding pricing and available services. A public rate card will provide transparency, fairness, and equal opportunities to all prospective service providers.

6. Declaration

- a) I hereby apply to Ofcom for the grant of a licence for the small-scale radio multiplex licence described above and declare that the information given in this application form is, to the best of my knowledge and belief, correct.
- b) I further declare and warrant:
- i) that the applicant is not a disqualified person within the meaning of that expression as defined in Part 2 of Schedule 2 to the Broadcasting Act 1990, as amended, or as a result of a disqualification order under section 145 of the Broadcasting Act 1996;
 - ii) that having made all reasonable enquiries neither the applicant nor any person controlling the applicant, as result of the grant to me of the licence, breach any requirement of Schedule 14 to the Communications Act 2003 with regard to the accumulation of interests in broadcasting services or to the restrictions on cross-media interests;
 - iii) that the applicant is not disqualified by virtue of the provisions of section 143 (5) of the Broadcasting Act 1996 in relation to political objects and the provisions of section 144 (3) of the Broadcasting Act 1996 in relation to the provision of false information or through the withholding of information with the intention of misleading Ofcom; and
 - iv) that no director or person concerned directly or indirectly in the management of the Licensee is the subject to a disqualification order as defined by section 145 (1) of the Broadcasting Act 1996.
- c) I understand that Ofcom reserves the right to revoke the licence (if granted) if at any time any material statement made to Ofcom is found to be false and to have been by the applicant or any member or officer thereof knowing it to be false. I also understand that under sections 144 and 145 of the Broadcasting Act 1996, the provision of false information could incur a criminal conviction and a disqualification from the holding of a Broadcasting Act licence. I further certify that, to the best of my knowledge, any matters which might influence Ofcom's judgement as to whether the directors and substantial shareholders involved in this application are fit and proper persons to participate in a radio licence, have been made known to Ofcom.

Full name (BLOCK CAPITALS) of the person authorised to make the application of behalf of the applicant:



DANIEL NATHAN - DIRECTOR BRIGHTON & HOVE DIGITAL RADIO CIC

Date of application:

29 JUNE 2023

I am authorised to make this application on behalf of the applicant in my capacity as company director.