
Small-scale radio multiplex licence

Application form – Part A (public)

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

MK DIGITAL MEDIA LTD

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

MILTON KEYNES POLYGON

APPLICATION FORM:

Publication date: 28 January 2022

1. Overview

MK Digital Media's coverage extends to 86% of the polygon population

Our field strength reaches the principal population centres in the area

The know-how of our team ranges from in-depth and unrivalled local knowledge to SFN operational expertise through our technical partner and shareholder - Digris

Proven business expertise of our board members has allowed us to take a pragmatic view towards balancing coverage aspirations with essential cost control

Three C-DSP services are participants in MK Digital Media

Eleven radio services will apply for C-DSP licences – the mandated reserve capacity is for five – we shall extend this

We have engaged extensively with 61 potential service providers

Our developed policy will allow us to trade fairly and inclusively in a competitive environment

2. Extent of proposed coverage area

- 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):

The extent of MK Digital Media's proposed coverage, equates to 86% of the Ofcom licence area polygon population

Population covered

The principal population centres in the Milton Keynes polygon are Milton Keynes (139,100 adults) Bletchley (29,600) Newport Pagnell (12,500) and separately to the south of the polygon Leighton Buzzard (30,700). The localities around Milton Keynes lie on a ground level within the range of 60m a.o.d. and 115m a.o.d., a deviation of 55m. Towards Woburn, south west of Milton Keynes, the land level steadily rises, but beyond this, the most usable areas of higher ground necessary to achieve good propagation, are either on the edge of, or outside the polygon.

Propagation challenges overcome

Built in the 1960s, planners of the new town of Milton Keynes stipulated that no building should stand taller than a tall tree. In the years that followed this constraint has been progressively relaxed. Today, there are a number of buildings of ten storeys or greater and it is on one of these that MK Digital media plans to site its principal transmitter.

Leighton Buzzard relay

To serve Leighton Buzzard and Linslade a relay transmitter is necessary. The nature of the nearby surrounding terrain presented a number of problems but a site on the immediate outside edge of the polygon perimeter line will deliver good reception into the town. This is the most realistic and practical option. For this site we propose low power and significant directionality in order to keep overspill of unwanted signals to the south and east to an absolute minimum.

Sustainability

The economic pressures placed on this area (see business plan for more information) conspire against further relay transmitters at this stage. The cost of procurement and installation together

with additional operating costs, including site rental makes serving other areas an unwise expansion during the early years in the life of this new company.

Western area not served by any polygon

Towcester and Silverstone (population circa 9,000) form an area contiguous to the Milton Keynes licensed area but outside the polygon and not served by any other Ofcom polygon area. We plan to work with Radio Silverstone (long term RSL covering the F1 British Grand Prix each year). The radio service is keen to develop the UK's first full-time motorsport radio station (the Silverstone circuit holding a large number events between March and October each year). By incorporating this internationally renowned venue which is already closely aligned on a number of different levels with Milton Keynes, the prospect of a unique funding model emerges which would support innovative and fresh radio programming. If awarded the Milton Keynes radio multiplex licence, and should alternative funding options prevail, we would seek to cover this area should the opportunity arise to do so.

To the north

In the northern part of the Milton Keynes polygon a 63dB μ V/m signal reaches beyond the town of Olney (population 8,000) but terrain limited coverage affects much of the Olney town centre area. Here it is noted that a receivable signal (in the order of 57dB μ V/m) occurs and so we are satisfied that residents in this area would not be totally alienated from our proposed coverage. Indeed, terrain shielding is likely to afford some protection from incoming interference. However, for the purposes of this licence application the total population covered relates only to those areas where a field strength of 63dB μ V/m or greater occurs.

The table below summarises the extent of our predicted coverage:

Milton Keynes	Adults 15+	Percentage
Licence area population:	260,397	100.0%
Predicted coverage inside polygon:	223,301	85.8%
Predicted coverage outside polygon:	5,583	2.1%
Local DAB service 1. LRMS: Herts, Beds & Bucks	2,008,567	100.0%
Total predicted coverage:	228,224	11.4%

Overlap with Local DAB service 2. LRMS Northamptonshire is minimal.

Co-block protected areas

Leicester; Corby & Kettering; Cambridge; South Hertfordshire; South Buckinghamshire; Berkshire North & South Oxfordshire; Witney; Leamington Spa & Stratford-upon-Avon, & Coventry are shown as possible co-block protected areas.

Seeking to maintain outgoing interference below specified levels

As part of the application assessment for small-scale radio multiplex licencing, we note that the prevailing legislation 51(2)(a) of the 1996 Act, requires Ofcom to consider the extent of the coverage area proposed in this competitive award process. The implication being - greater and even coverage is preferred to limited and patchy coverage.

However, in the licence advertisement for Milton Keynes we note that Ofcom has stipulated that possibly nine small-scale DAB licence areas will require protection in accordance with terms specified in the Guidance Notes 4.51 d). The implication being that a 63dBuV/m signal up to the edge of the Milton Keynes polygon line should not exceed 38dBuV/m (at 10m height) into 'possibly' nine individual licence areas.

Our analysis and predictions have suggested that due to the close proximity of these co-block areas, there is a likelihood that in a limited number of cases, unwanted signals in excess of 38dB from the proposed Milton Keynes multiplex, may be received in some of these areas.

As an applicant, we face an almost impossible dilemma. Demonstrate the extent that we can deliver a robust signal throughout the advertised area or lower our predicted field strength to reduce potential overspill into 'possible' protected areas. The outcome of which being, limited and patchy coverage within the advertised area – a situation that would weaken our application when being assessed in regard to the extent of coverage proposed.

With overspill (outside the polygon) already limited to 2.1% of total adult population, to demonstrate the degree to which we have gone to resolve this challenge, we can share that we have conducted detailed analysis in three specific areas:

- the directionality in the HRP where practicable,
- combinations of possible sites and power levels, and
- liaison with UK manufacturers capable of producing antenna with a customised VRP

If required, we can provide Ofcom with our 38dB coverage plot. Our assessment has been carried out assuming a 'worst case' (isotropic) radiator. i.e - with no VRP restrictions applied.

We also believe the interference would not appear as severe with more detailed clutter data, and Digiris are in the process of procuring this to improve accuracy.

The table overleaf summarises the current position and likely impact into the listed polygon areas.

As may be seen from the table below, four out of nine areas are unaffected by our predicted coverage while a further three, will possibly receive minor levels of interference on high ground in sparsely populated areas.

Summary of interference into possible co-block protected areas				
Description of coverage:	No noticeable interference	Minor pick-up on high ground on edge of polygon. Sparsely populated area	Slightly more pronounced pick-up on edge of polygon. Sparsely populated area	High ground but across polygon.
Impact:	No discernible impact	Very low impact	Low/medium impact	Substantial impact
Polygon:				
Leicester	X			
Corby & Kettering				X
Cambridge	X			
South Hertfordshire		X		
South Buckinghamshire			X	
Berkshire, North Oxfordshire		X		
Witney		X		
Leamington Spa & Stratford upon Avon	X			
Coventry	X			

Our solution

We have proposed to reach 86% of the population inside the polygon area employing two low power sites at 100 watts and 35 watts e.r.p. respectively. Should MK Digital Media be awarded the Milton Keynes small-scale radio multiplex licence, we would willingly work with Ofcom to tailor our technical plan, applying necessary remedies and approaches, once there is certainty regarding which co-block areas require protection. In short, our aim is to serve an appropriately sized population in the Milton Keynes advertised area, while developing a final technical plan that will keep outgoing interference within acceptable levels, once we are in a position of greater clarity.

Potential for hole-punching

Finally, we have conducted an assessment into the likelihood of A.C.I. and this is set out in answer to Q5.2 (O-R) in Part B of this application.

Small-scale radio multiplex licence: Application form (Part A)

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

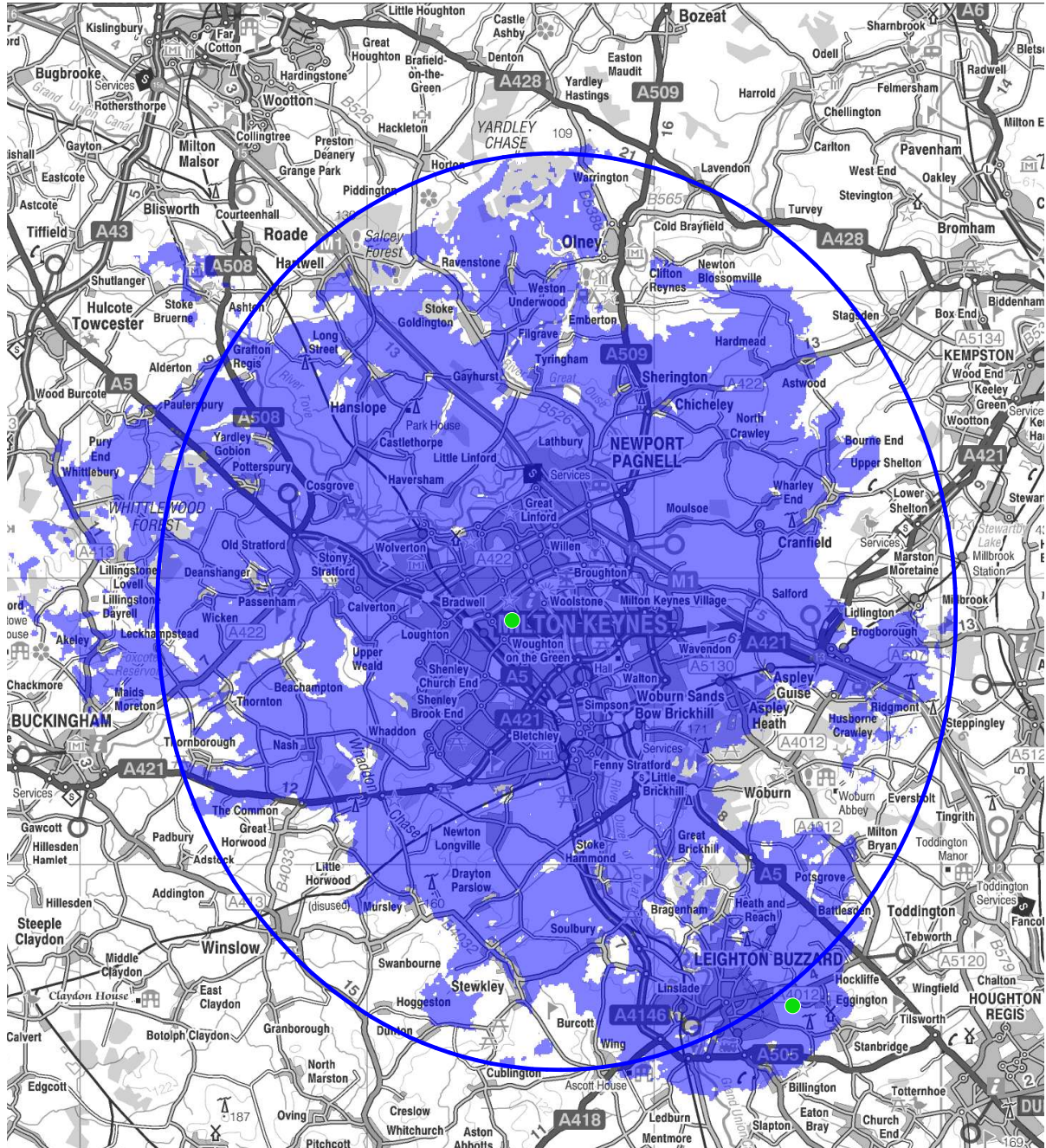
Site name	NGR	Antenna height (m agl)	Antenna type proposed with bearing	New or existing antenna	ERP (W)
Milton Keynes	SP8509038470	60m	Co-linear (omni HPR with custom VRP to reduce overspill as required)	New	100W
Leighton Buzzard	SP9485925036	10m	3-element uda-yagi 300 degrees ETN	New	35W

2.3 Please provide 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.

Please see coverage map overleaf

MK Digital Media Coverage Prediction Map

Whole transmitter network showing 63 dB μ V/m field strength



digiris

Small-scale radio multiplex licence: Application form (Part A)

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 V23.0 release 1456
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 Frensel Zone fraction 0.8
Where multiple sites are proposed, describe what methodology has been used to assess the network (SFN) gain	Power sum
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?	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):

MK DIGITAL MEDIA LTD

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

13705276

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:

Sunrise House
140 East Parade, Bradford BD1 5BP

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
Christopher Robert Gregg	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<u>Director:</u> Taz Leisure Ltd <i>Entertainment</i> <u>Director:</u> Horizon Radio Ltd <i>Broadcasting</i>	Senior Corporate Fundraiser Willen Hospice

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

Small-scale radio multiplex licence: Application form (Part A)

			<p><u>Director:</u> Bedford Digital Ltd <i>Broadcasting</i></p>	
Michael Sylvester Johnson	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<p><u>CEO:</u> Life Radio UK <i>Charity</i></p>	Self Employed
Narinder Kaur Memon aka Jessica Memon	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<p><u>CEO:</u> Roq Group Ltd <i>Broadcasting</i></p>	<u>Co-ordinator</u> Cirtus Relocation Global
Rashid Mustapha	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<p><u>Director:</u> Digris Ltd <i>DAB Transmission</i></p> <p><u>Director:</u> Opendab C.I.C. <i>Radio Broadcasting</i></p>	Chief Technology Officer Digris Ltd
Rajan Parmar	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<p><u>Director:</u> Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) <i>Broadcasting</i></p> <p><u>Director:</u> Spice Entertainment Ltd <i>Hospitality</i></p> <p><u>Director:</u> Infocus Digital Media Ltd <i>Media</i></p> <p><u>Director:</u> Leeds Digital Media Ltd <i>Media</i></p> <p><u>Director:</u> Bradford Digital Media Ltd <i>Media</i></p> <p><u>Director:</u> Credible Focus Ltd <i>Media</i></p> <p><u>Director:</u> Bolton and Bury DAB Ltd <i>Media</i></p>	<u>Executive Director</u> Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) <i>Broadcasting</i>

Small-scale radio multiplex licence: Application form (Part A)

			<p><u>Director:</u> BBD Digital Media Ltd <i>Media</i></p> <p><u>Trustee:</u> Alan Foster Trust <i>Charity</i></p>	
Matthew Paul Ramsbottom	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<p><u>Director:</u> Oldham FM Ltd <i>Broadcasting</i></p> <p><u>Director:</u> Oldham Chronicle Ltd <i>Publishing</i></p> <p><u>Director:</u> Credible Media Ltd <i>Media</i></p> <p><u>Director:</u> Bolton and Bury DAB Ltd <i>Media</i></p> <p><u>Director:</u> Credible Focus Ltd <i>Media</i></p> <p><u>Director:</u> Sound Kitchen Manchester Ltd <i>Hospitality</i></p>	<p><u>MD</u> Oldham FM Ltd <i>Broadcasting</i></p>
Paul Boon	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<p><u>Director:</u> M&S Digital CIC <i>Radio applicant group – dormant</i></p> <p><u>Director:</u> Opendab CIC <i>Radio broadcasting</i></p> <p><u>Director:</u> City West Digital CIC <i>Radio applicant group – dormant</i></p>	

Small-scale radio multiplex licence: Application form (Part A)

			<p><u>Director:</u> South of the River Digital CIC <i>Radio applicant group - dormant</i></p>	
Usha Parmar	Sunrise House 140 East Parade, Bradford BD1 5BP	UK	<p><u>Director:</u> Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) <i>Broadcasting</i></p> <p><u>Director:</u> Spice Entertainment Ltd <i>Hospitality</i></p> <p><u>Director:</u> Infocus Digital Media Ltd <i>Media</i></p> <p><u>Director:</u> Leeds Digital Media Ltd <i>Media</i></p> <p><u>Director:</u> Bradford Digital Media Ltd <i>Media</i></p> <p><u>Director:</u> BBD Digital Ltd <i>Media</i></p> <p><u>Director:</u> Credible Focus Ltd <i>Media</i></p> <p><u>Trustee:</u> Rishi's Vision <i>Charity</i></p> <p><u>Trustee:</u> Jai Maa Bhameshwari Kali Mandir <i>Charity</i></p>	<p><u>CEO</u> Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire)</p>

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
Horizon Radio Ltd	122	£12,200	24.4%	24.4%
Life Radio UK	5	£500	1.0%	1.0%
Roq Group Ltd	5	£500	1.0%	1.0%
Paul Boon	2	£200	0.4%	0.4%
Digris Ltd	122	£12,200	24.4%	24.4%
Infocus Digital Media Ltd	122	£12,200	24.4%	24.4%
Oldham FM Ltd	122	£12,200	24.4%	24.4%

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, 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)
Infocus Digital Media Ltd	Sunrise House 140 East Parade Bradford BD1 5BP	Rajan Parmar
Oldham FM Ltd Oldham Chronicle Ltd Credible Media Ltd	Sunrise House 140 East Parade Bradford BD1 5BP	Matthew Ramsbottom

Small-scale radio multiplex licence: Application form (Part A)

Sound Kitchen Manchester Ltd		
Bradford Digital Media Ltd	Sunrise House 140 East Parade Bradford BD1 5BP	Infocus Digital Media Ltd
Credible Focus Ltd Bolton and Bury DAB Ltd	Sunrise House 140 East Parade Bradford BD1 5BP	Oldham FM Ltd
Bradford City Radio Ltd	Sunrise House 140 East Parade Bradford BD1 5BP	Usha Parmar

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)
N/A		

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
N/A	

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
N/A	

- 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	N/A
A body whose objects are wholly or mainly of a political nature, or which is affiliated to such a body	No	N/A

A body whose objects are wholly or mainly of a religious nature; ²	YES	Usha Parmar is a Trustee of Rishi's Vision (Charity) and a Trustee of Jai Maa Bhameshwari Kali Mandir (Charity) This information has been provided in order to be consistent with information provided in the Declaration for Sunrise Radio (Yorkshire) licence AL000037BA/2 (Bradford City Radio Ltd). Although both charities are founded through the work of religious bodies, we believe Ofcom will regard their objects as being neither of a 'wholly or mainly' religious nature.
An individual who is an officer of a body falling within (b) or (c);	No	N/A
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	N/A
An advertising agency or an associate of an advertising agency	No	N/A

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

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.

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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”)?

No

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)	N/A	
(b)	N/A	
(c)	CR10077BA/1	MKFM from September 2015 to October 2016
	CR103405BA/1	Revolution Radio from June 2020 to date
	DP000163BA/1	TheBeat Ltd from January 2013 to October 2016 Licenced DAB Service for MKFM

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	CR100777BA/1	Secklow Sounds from June 2017 to September 2020
	RSL	Adventist Radio every year from 1996 to 2004 and in 2006
	RSL	Splash FM September 2002 and June 2007
	RSL	Light FM every year from 2008 to 2011
	RSL	Secklow Sounds in January 2012
	RSL	Mela FM (RSL in Manchester) June 2001
	AL000037BA/2	Bradford City Radio T/A Sunrise Radio (Yorkshire) 1989 to date
	DP000061BA	Bradford City Radio T/A Sunrise Radio (Yorkshire) (Bradford & Huddersfield Multiplex) - 2004 to date
	DP000061BA	Masti Radio (Bradford & Huddersfield Multiplex) 2004 – 2013
	DP000061BA	Glasgow Small-scale Multiplex Trial service 2016 – 2020
	DP000061BA	Manchester Small-scale Multiplex Trial service since May 2016
	RSL	Tower FM (Bolton/Bury), 1994, 1995
	AL100192BA/2	Imagine FM 1994-2005, 2012-2018
	AL100918BA/2	Tower FM, 1999-2007
	AL000073BA/5	The Pulse, 2001-2003
	AL000077BA/6	BRMB (Free Radio), 2006-2007
	BBC000022WT/2	BBC Local Radio, 2007-2012
	AL000061BA/5	Free Radio (Beacon Black Country, Wyvern FM and Beacon Shropshire), 2007-2012
	AL000119BA/6	Revolution 96.2, 2014-2020
	AL101134BA/2	Revolution 96.2 from 2015 to Nov 2020
	DP101091BA/1	Mom's Spaghetti from Nov 2020 – present
(d)	N/A	

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(e)	N/A	
(f)	N/A	
(g)	N/A	
(h)	N/A	
(i)	CR103405BA/1	Breach of licence. No sanction imposed.
	AL101134BA/1	Breach of licence. No sanction imposed.

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		

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.

Agreed and confirmed funding together with a clear expenditure plan and capital costs tailored to deliver coverage to the majority of potential listeners in the area, means that MK Digital Media can establish the proposed service

Milton Keynes is on the most northern edge of the south east region, the most prosperous part of the UK, but with much attention being focussed on London there are factors at play that have the effect of depressing the propensity to carry a full inventory of services on the multiplex, and with that the potential for successful trading.

We point this out because at an early stage we discovered a balance needed to be struck between the cost of operating a number of transmission sites to achieve widespread coverage and the necessity to demonstrate our ability to establish this multiplex service on a sound economic footing.

Our income will come from the fees charged for carriage and so our objective is to pitch carriage costs at affordable rates not only for C-DSP community radio services but also for DSP service providers. This way we can adopt inclusivity into our trading model, making access to the Milton Keynes radio multiplex, available to a wide range of prospective carriage customers. This can only be achieved if the company can manage to contain operating costs.

MK Digital Media has set expenditure levels (capital expenditure and annual operating expenditure) at levels below the expected level of income, allowing for a modest operating margin.

The company benefits from four principal investing shareholders who are well placed to ensure adequate resources are available to deliver this service well within the fixed 18 month timescale. Infocus Digital Media, Oldham FM, Horizon Radio and DAB transmission specialists Digris comprise our four principal investors. Together they will invest in excess of 95% of the required capital in order that the company may plan, purchase, and build-out the radio multiplex service over a ten-month start-up period.

To determine the scale of this required expenditure, a detailed budget has been produced. The costs have been taken from a line-by-line listing of components and other areas of cost. This in turn has been validated against a detailed quotation from Digris, business knowledge and operational experience, and applied to this Milton Keynes radio multiplex licence application.

A similar approach has been taken in assessing the revenue potential from this radio multiplex service. Supporting information can be provided to Ofcom on request.

High-level estimation of costs:

<u>Item</u>	<u>Cost £s</u>
Transmitters	11,000
Core equipment	9,600
Ancillary equipment	4,200
Network design	5,000
Installation	7,000
Total:	36,800

Expenditure:

Pre-operational costs	7,000
Annual operating expenditure	47,000

As may be seen from the figures set out above, with the company being capitalised at £50,000 and initial costs of £43,800 (£36,800 + £7,000) the radio multiplex service would launch with a surplus of £6,200. This gives our company confidence in being able to establish the proposed service.

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

a) Share capital:

MK Digital Media will be funded by share capital of £50,000

- 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): N/A

Small-scale radio multiplex licence: Application form (Part A)

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 (£)
Horizon Radio Ltd	24.4%	£12,200
Life Radio UK	1.0%	£500
Roq Group Ltd	1.0%	£500
Paul Boon	0.4%	£200
Digris Ltd	24.4%	£12,200
Infocus Digital Media Ltd	24.4%	£12,200
Oldham FM Ltd	24.4%	£12,200

**An organisational chart showing the ownership structure is submitted as Annex 1.
Horizon Radio Ltd, Roq Group Ltd and Digris Ltd are all new start-up companies.
Life Radio UK, a registered Charity, would normally submit their accounts to the Charities Commission. Their first-year accounts are due at the end of April 2022.
The most recent accounts for Infocus Digital Media Ltd and Oldham FM Ltd are available at Companies House.**

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 required funding is confirmed and available.

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.)

The MK Digital Media team of directors and associated specialists have between them, more than adequate skills and experience to demonstrate to Ofcom that they have the ability to establish the proposed service

From this team, six experienced directors will share responsibility for both overseeing and managing first-hand the day-to-day operation of the Milton Keynes radio multiplex. In particular using their thorough first-hand understanding of the requirements of programme service providers they will take the lead in ensuring that the multiplex will carry a full range of programme services and that the mux continues to be run on an operationally sound basis.

Importantly, their previous relevant experience outlined briefly below will be supplemented by the support of Digris, a transmission partner and shareholder who will plan, implement, build-out, test and maintain the transmission aspects of the service going forward.

Chris Gregg

Chris is a radio programmer with over 30 years' experience having worked for GCap Media, Global Radio, UKRD and Chrysalis Radio and holds a Bachelor of Broadcasting degree from Leeds University.

As Programme Controller of Milton Keynes' Horizon Radio, he oversaw the rebrand to Heart before going on to found MKFM as a community radio station for Milton Keynes in 2011 starting with 6 RSL broadcasts before taking carriage on the regional DAB multiplex from 2013, and then being awarded a Community Radio FM licence in 2015.

He has worked as a marketing consultant in the Milton Keynes area with some of the largest brands in the town including Milton Keynes College, MK Marathon and the MK50 celebrations. Since 2018 he has been employed by Willen Hospice, the largest charity in Milton Keynes as a Senior Corporate Fundraiser with responsibility for arranging partnerships with key local businesses.

Chris has a strong network of connections in the local business community and third sector from these roles. He also runs a successful events company and is regularly

involved with some of the most popular events in Milton Keynes such as the Fenny Poppers music festival, MK Play Day, Newport Pagnell Carnival and the Milton Keynes Food and Leisure Awards.

Alongside these roles, he has continued to be involved with community radio and founded Revolution Radio in Northampton in 2020 which was awarded an FM licence and has been on air since Summer 2021.

Usha and Raj Parmar

Usha and Raj spearhead the Executive team at Sunrise Radio (Yorkshire) where as director/shareholders they utilise on a daily basis, a wide range of governance, compliance, broadcasting, general managerial and leadership skills.

These range from management and administration of sales contracts to overseeing programming and presenter direction, studio management, project management, accounting, sponsorship and airtime sales, marketing, website design and maintenance, creating social media initiatives and through other businesses – project, event and logistics management.

Usha and Raj have made their mark over a number of years as highly successful radio station operators and their proven track record shows that they are more than capable of contributing to the management and establishment of the multiplex and are able to conduct successful relationships with those seeking carriage.

Together they have led Sunrise Radio (Yorkshire) as early adopters of DAB radio broadcasting. In 2004 two Sunrise services were carried on the Bradford and Huddersfield multiplex. Today the company holds a DSP licence and in addition to broadcasting on the 'relevant' local DAB multiplex, Sunrise was one of the first radio companies to reach audiences via the Manchester and Glasgow small-scale DAB trial multiplexes.

In 2020 Usha and Raj founded Infocus Digital Media, a company that is the digital arm of the Sunrise Radio (Yorkshire) analogue radio service. They were awarded the Bradford small-scale radio multiplex licence in July 2021 and are members of the consortium that was awarded the small-scale radio multiplex licence for Leeds the same year.

Matt Ramsbottom

Matt Ramsbottom has substantial experience in both business and broadcasting and is a former Managing Director at Revolution 96.2 FM, recently sold to Bauer, and at Orion Media, having previously worked in a senior role at The Wireless Group.

He is an accomplished radio professional and entrepreneur with experience at working with clients at all levels. More recently, he has jointly overseen the launch of the new

“Mom’s Spaghetti” and “Madchester Radio” services, along with managing the re-launch of the local newspaper, The Oldham Evening Chronicle both online and in print.

He also works on large outdoor events, including contract management, artist liaison, strategy & planning, and logistics. His team were one of the original service providers for the Manchester small-scale radio trial multiplex, committing to the service before launch, and one of the few original services to remain on board throughout its tenure. Matt is comfortable working in business management at all levels, such as his own business’ clients which include local authorities, as well as engaging with larger radio groups, industry groups, community projects and regulatory bodies. He is a member of the Radio Academy.

Rash Mustapha

Rashid 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. 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.

Paul Boon

Paul is an independent radio specialist. Up until 2017, he worked in radio broadcasting policy and regulation where his work programme included a number projects such as the Ofcom response to the Government’s Digital Britain report and the Local Radio Multiplex licence award for Suffolk. He dealt with Arqiva (Digital One & BBC) Bauer, Global, MuxCo and Wireless/UTV on multiplex variation requests and other licencing and compliance matters. Paul was also editor of the radio and audio chapter of Ofcom’s annual Communications Market Report.

A former managing editor of the radio industry’s weekly trade publication the Radio Magazine, Paul has been radio station managing director, project manager, sales manager, marketing manager, journalist, broadcaster, consultant and broadcasting lobbyist over a period of three decades.

Paul brings a combined skill set of operational management and business know-how, UK radio market intelligence, policy implementation, creative flair, regulatory compliance and technical project management.

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	Established in 2012 Digris specialises in DAB installing, operating and maintaining transmitters throughout Switzerland, France and now in the UK for small-scale radio multiplex licensees in Leeds and Bradford.
Ongoing maintenance of the transmission equipment	Digris Ltd	
Installation of the Multiplexing equipment	Digris Ltd	
Day-to-day technical management and maintenance of the multiplexing equipment (if different from response to question 3.28 above)	Digris Ltd	

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:

MK Digital Media: award to operationally live in 10 months

In creating our project plan timeline, we recognise the potential for disruption caused by the UK hardware supply chain facing stress, and the availability of suitably qualified staff (caused in-part by the Round two awardees all working within a similar launch window time frame). This is not helped by the electronic component supply shortage from East Asian countries.

The plan adopted by MK Digital Media mitigates these issues to a large extent, through support from Digris (a shareholder in our company). The DAB transmission specialist can draw upon long-term partnerships founded in mainland Europe and the UK so as to ensure access to essential components.

With these factors in mind, and allowing adequate time for finalising and receiving approval of our technical plan, we anticipate our service being operational within 10 months from award.

Our high-level Gantt chart lists 26 key activities grouped together as seven facets.

While many individual activities (shown in blue) will be resolved within four to eight weeks, certain activities will take longer to conclude. For example, we have adopted a worst-case scenario in terms of time spent resolving any potential risk of undue interference. Although we note Ofcom's new process may be fully implemented by this date, we have still allowed up to 5 months. Additionally for frequency clearance we have allowed up to 7 months. We have shown any such overruns in yellow on the plan.

Supported by the Gantt chart, submitted as **Annex 2**, which illustrates those activities, dependant upon predecessor activities being concluded, we are led to our assessment that without overruns, we can expect to be operationally live in 10 months from award.

- 3.24 In addition, please provide, as an annex to be submitted with this application, an outline project plan with 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 Annex 2 the MK Digital Media timeline.

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 licensed 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 licensed 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):

Three C-DSP services are participants in the application body MK Digital Media Ltd

Horizon Radio – 24.4% shareholding and Chris Gregg the nominated director

Life Radio UK – Licence number DP103640BA/1 – 1% shareholding and Michael Johnson the nominated director

Roq Raw Radio – 1% shareholding and Narinder Kaur Memon the nominated director

Each of these three radio services intend to apply for a C-DSP licence.

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.

Eleven services in the MK Digital Media line-up will apply for C-DSP licences		
Name of service provider and station name (if known)	Proposed C-DSP or DSP	Nature of evidence of support provided
Horizon Radio Ltd	C-DSP	Signed Heads of Agreement - Participant
Life Radio UK	C-DSP	Signed Heads of Agreement - Participant
Roq Raw Radio	C-DSP	Signed Heads of Agreement - Participant
45 Radio	DSP	Signed Heads of Agreement
Aakash Radio	DSP	Signed Heads of Agreement
Angel Radio	DSP	Signed Heads of Agreement
Arena Radio	DSP	Signed Heads of Agreement
Asian Radio Live	DSP	Signed Heads of Agreement
Bedford Radio	DSP	EOI
Bengali Radio Live	DSP	Signed Heads of Agreement
CRMK	C-DSP	Signed Heads of Agreement
Dance Radio Network	DSP	Signed Heads of Agreement
Diverse Radio	DSP	Signed Heads of Agreement
Gorgeous Radio	DSP	Signed Heads of Agreement
I Told You So	DSP	Signed Heads of Agreement
Leighton Buzz Radio	C-DSP	Signed Heads of Agreement
Luton Urban Radio	DSP	EOI
Madchester Radio	DSP	Signed Heads of Agreement

Small-scale radio multiplex licence: Application form (Part A)

Marefa Radio	DSP	Signed Heads of Agreement
Mom's Spaghetti	DSP	Signed Heads of Agreement
N Live	DSP	EOI
Olney Radio	C-DSP	Signed Heads of Agreement
R360	C-DSP	Signed Heads of Agreement
Radio Lab	DSP	Signed Heads of Agreement
Radio MK	C-DSP	Signed Heads of Agreement
Radio Silverstone	DSP	EOI Email
Real City Radio	C-DSP	Signed Heads of Agreement
Revolution Radio	DSP	Signed Heads of Agreement
Secklow Sounds	C-DSP	EOI Email
Spectrum on-air	C-DSP	EOI
Stoney Radio	DSP	EOI
Sunrise Radio	DSP	Signed Heads of Agreement
The Groove	DSP	Signed Heads of Agreement
The Voice of Islam	DSP	Signed Heads of Agreement
Ultra Vegas Radio	DSP	Signed Heads of Agreement
<p>Evidence of the demand or support, including signed heads of terms and emails, please see <u>Annex 7.</u></p>		

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:

Our website, industry press and proactive engagement have led us to initiate relationships with 61 potential service providers.

MK Digital Media's dealings and transactions have been transparent and our proposed implementation of a detailed trading policy, common to all services, will serve us well during the licence period.

Measures taken prior to Ofcom's advertisement announcement

In October 2021 we commenced reaching out to locally based programme service providers.

We discovered that in the wake of Global Radio's withdrawal from local radio (a result of its reduced commitment to, and presence in, Milton Keynes) that the impact of this destructive approach on employment in the local radio sector, was separately further fuelled by financial pressures and compliance issues linked to community radio operators in the area. The net result being, that a significant degree of churn was evident among personnel who work or had worked in the wider Milton Keynes radio sector.

This presented MK Digital Media with a very fragmented radio landscape where trust and empathy was in short supply and where various rival factions thrived.

Taking all these factors on board, our decision was to adopt an inclusive approach to all radio operators through a company overseen by three experienced radio operators from outside the area, who didn't 'have an axe to grind'.

One aspect of the fallout from the occurrences described above was that there was a relatively high number of online and digital radio stations based in the area, underpinned by legacy analogue community radio services.

This meant that while we approached the two community radio stations MKFM and Secklow Sounds, we also made approaches to the online radio services. In the case of the latter, we were able to explain our plans through virtual meetings in November and December 2021, following-up this initiative with phone calls and an in-person meetings in February 2022. Following this, eight online and one digital radio service signed up seeking carriage with MK Digital Media, two of which became participants in the group.

Approaching potential programme service providers following Ofcom's advertisement announcement

In February we once again made contact with the two analogue community radio services MKFM and Secklow Sounds with a view to encouraging them as participants in MK Digital Media and adding their radio stations to our bouquet of services.

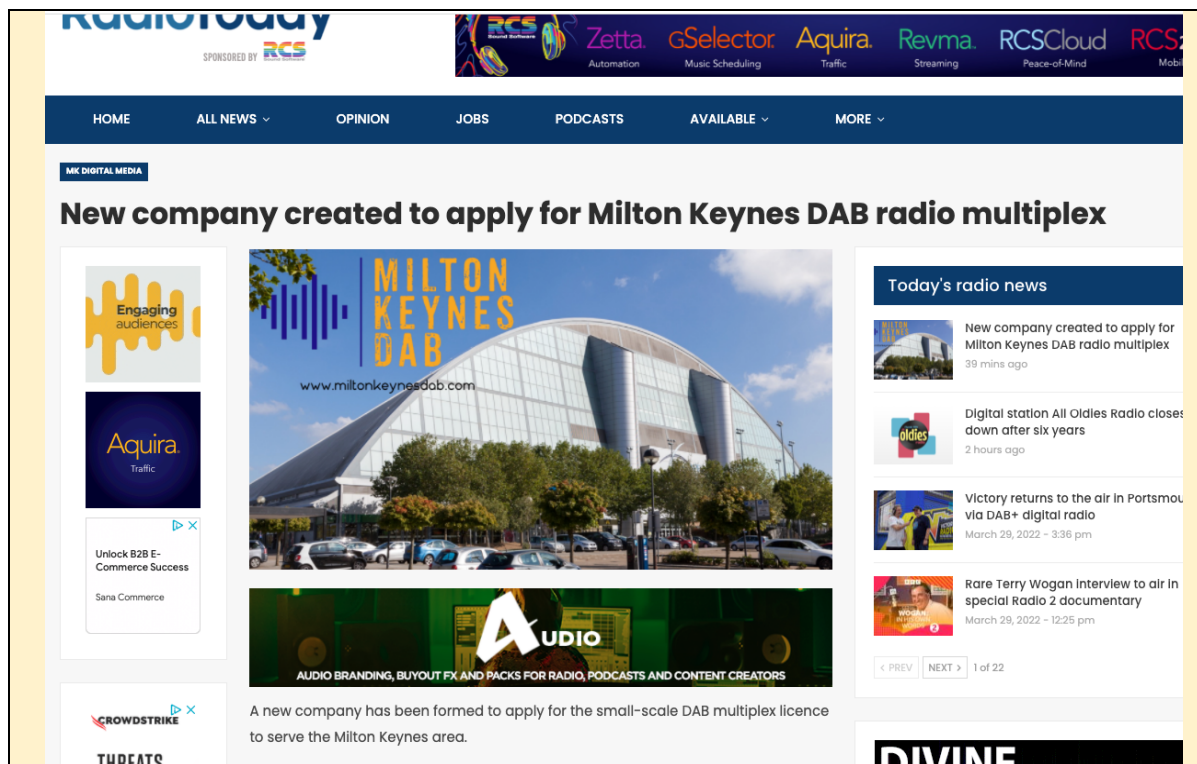
Both services expressed enthusiastic interest in joining our applicant group as participants and as programme service providers and took great interest in how we proposed to take this application forward. A second virtual meeting was established where detailed proposals were set out with MKFM who were also contemplating investing in MK Digital Media as well as suggesting two additional programme services which our radio multiplex could carry.

In the closing weeks of the submission of this application, MKFM decided to withdraw its co-operation, its support and its services, citing an overwhelming reluctance to work with other operators in the Milton Keynes radio landscape, who had already joined our applicant group.

Having deliberately chosen an inclusive policy, a cornerstone of our approach to fair and effective competition, our hands were tied as we stood by the appropriate stance, namely to allow all properly licenced entities to be permitted to be involved in, and broadcast on, the Milton Keynes radio multiplex.

Following this divergence with MKFM, going forward should MK Digital Media be awarded this radio multiplex licence, we will implement our policy of inclusivity and welcome this radio service onto the multiplex, subject to capacity constraints. In short, we would treat this entity in a manner consistent with other programme service providers and not as a rival.

Continues..



Finally, as part of our sequence of activities following Ofcom’s advertisement announcement, we obtained prominent coverage in Radio Today (see above) which led directly to our connection with Horizon Radio, led by Chris Gregg. Our inclusive approach to carriage and indeed, participation in the MK Digital Media applicant group, led to Horizon/Chris ceasing to be a rival applicant for this radio multiplex licence and become a full participant instead.

In addition, our Radio Today coverage led to an Expression of Interest from neighbouring radio service Radio Bedford.

Overall, 35 (11 C-DSPs and 24 DSPs) programme service providers have registered expressions of interest or signed Heads of Agreement to be carried on the MK Digital Media radio multiplex, should we be awarded this licence.

Measures taken in our dealings with C-DSPs and DSPs

Moving on to the negotiation process, our dealings with all prospective digital sound programme providers have been level, open and transparent. Our Heads of Agreement form is standardised with common terms. It shows indicative prices for carriage whether these are heavily discounted carriage costs for community radio (C-DSPs) or showing the full standard indicative price.

Measures we will take during the licence period

Our website will showcase our finalised carriage charges and the process of applying for carriage. We will pledge on the website that we will not charge more than the rate-card rate shown.

To promote competitive entry, applications for carriage will not be assessed purely on economic grounds.

To this end we have developed a trading policy. Our policy for trading in a fair and competitive environment embodies four overarching thresholds and our application procedure will be a three-stage process. Our thresholds include aspects such as 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. Our process includes sifting and reviewing applications and placement on a waiting list. Upon conclusion, uniform carriage agreements with shared basic terms will be issued to service providers.

A full copy of our policy can be made available to Ofcom on request.

We believe that in adopting this structured approach we will demonstrate fairness in a manner that will stand up to scrutiny.

Overall, by embodying all the elements above, in particular our role in encouraging inclusivity, MK Digital Media can be seen to have developed a rigorous framework with defined areas of activity. This framework when taken as a whole, should, we trust, be seen to have been constructed in a manner calculated to ensure fair and effective competition in the selection and engagement of programme services for carriage on the MK Digital Media small-scale DAB radio multiplex.

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:

PAUL BOON

Date of application:

22 April 2022

I am authorised to make this application on behalf of the applicant in my capacity as (delete as appropriate):

Company director

You now need to complete the **confidential section (Part B)** of the application form.