
Small-scale radio multiplex licence

Application form – Part A (public)

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

East Sussex Digital Radio Ltd.

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

Eastbourne, Newhaven and Lewes

APPLICATION FORM:

Publication date: 30 March 2023

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1. Overview

This application by East Sussex Digital Radio Ltd has core representation from the local Community Radio Stations along with the local Commercial Radio Station. All have proven expertise in providing programme services.

Those involved have a history of providing benefits to the local communities, engaging local charities and community organisations, and gaining the loyalty of local business advertisers.

East Sussex Digital Radio Ltd includes additional support and participation from neighbouring radio stations in Sussex and technical expertise from leaders in the field of small-scale radio multiplexes.

The applicant is formed of local experts with passion to provide local radio and it is making this robust application with a strong technical solution and the resources to establish the service for programme providers, our local communities and the local economy.

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):

Population Covered

The Eastbourne, Newhaven and Lewes area (610km²) forms part of the county of East Sussex surrounding the beautiful landscape of the South Downs and the chalk cliffs which form the spectacular edge of the English Channel. In the east of the area there is the coastal plain of Eastbourne and Pevensey, where the forces of William the Conqueror landed in 1066. To the North is the lowland forests and marshes of The Sussex Weald.

The area has additional towns - Seaford, Hailsham, Peacehaven and Polegate - as well as surrounding villages. The total population represents some 40% of the county.

Several primary roads run through the area, both East-West (the A27 and A259) and North-South (the A22 and A26). Public transport provision includes the 'Coastway East' railway line (connecting the area with London, Brighton and Hastings), several local bus companies and a regular passenger and freight service from the ferry port of Newhaven to France (Dieppe).

There is a range of retail and commercial business, including a strong tourist and holiday trade. The 'Sunshine Coast' and the 'Ouse Valley' have much to offer residents and visitors alike. The area attracts an above-average proportion of retired people.

All the Ofcom licenced radio stations based in the advertised area and many of those based in the neighbouring four advertised areas (Brighton and Hove, Haywards Heath & Uckfield and Hastings) have been involved in the discussions which have informed this application.

To serve this interesting and variable landscape two existing transmitter sites will be utilised:

- Butts Brow on the downs above Eastbourne
- The MCA mast on the coastal edge of the downs above Newhaven

These will provide substantial coverage of the area within the polygon including the principal towns and the major roads.

Unserved Areas

The nature of the South Downs and the multiple river valleys means that providing uniform coverage across this polygon would be particularly difficult. Given the challenging terrain, a large number of relay transmitters would be required. This can be seen from the existing non-contiguous VHF (FM) coverage of Seahaven FM between their Eastbourne and Newhaven transmitters. This is especially apparent at 64dBuV/m at 10m - the planning level used for 'interference limited' FM community radio coverage. Given this precedent, we believe it is better to provide DAB coverage which largely mimics the existing FM community radio coverage.

The applicant also proposes a third transmitter:

- Lewes Town

The county town is thought to be a priority case. Nestled on a tidal inlet (the River Ouse) and beside steep cliffs, the town already has a radio and TV relay and this low power transmitter will provide similar coverage.

If awarded the Eastbourne, Newhaven and Lewes radio multiplex licence, East Sussex Digital Radio Ltd would aim to explore additional fillers once established with appropriate reserves accumulated or alternative routes to funding opened. These would address the unserved areas on the fringes of the polygon and/or give additional coverage in the villages in the Cuckmere Valley such as Alfriston.

Sustainability

Whilst the proposed population coverage is sustainable, in the present circumstances, the economic pressures placed on this area (see business plan for more information) support the three-transmitter solution but conspire against further relay transmitters at this stage. The additional operating cost burden, including site rentals, would make attempting a thicker network build-out an unwise proposition during the early years of this new company.

We have therefore concentrated on providing coverage to the areas served on FM by existing community radio within the polygon.

Predicted Coverage

The following table summarises the extent of our predicted coverage:

Adults 15+	Percentage	
Advertised area population:	205,046	100%
Predicted coverage inside polygon:	162,661	79%
Predicted coverage outside polygon:	13,385	6.5%
Local DAB Multiplex: LRMS Sussex:	1,344,906	100%
Predicted coverage inside LRMS:	176,046	13%

Co-block protected areas

This proposed service would be compliant because it would not cause any significant interference above 38 dBµV/m to small-scale DAB areas outside of the macro area.

If required, Ofcom can be provided with a 38 dBµV/m coverage prediction.

International

Our 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.

Our technical partners have the capability to deploy custom antennas which can further mitigate outgoing interference should more stringent restrictions result from the international coordination process.

Potential for hole-punching

Finally, we conducted an assessment into the likelihood of ACI and our investigations concluded that there is no risk from the two main sites.

As shown above, a third (and novel, multi-block capable) filler is proposed to serve Lewes - subject to an in-depth ACI investigation by our technical partner. This work would take place should East Sussex Digital Radio be awarded a licence as the initial assessment suggested there could be a significant risk.

East Sussex Digital Radio may propose to drop this site from the coverage plan if it proves impractical to operate from this site and would propose that Lewes remain unserved if another suitable 'cost neutral' replacement cannot be found.

The loss of the relatively small population would not materially affect the East Sussex Digital Radio business plan.

Conclusion

Our predicted coverage reaches 162,661 adults (79%) inside the Eastbourne, Newhaven & Lewes polygon. Overspill has been constrained to 6.5%.

The plan affords some 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):

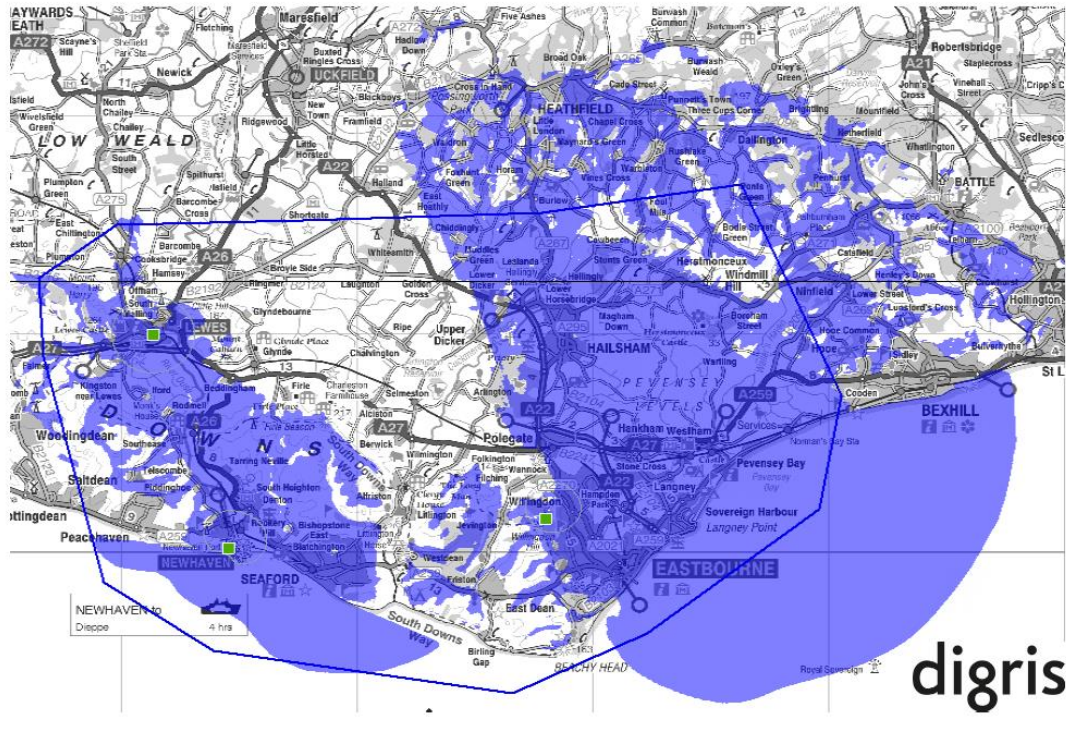
Site name	NGR	Antenna height (m agl)	Antenna type proposed with bearing	New or existing antenna	ERP (W)
Eastbourne	TQ 5800 0152	13m	3-element uda-yagi on 30 degrees ETN	New	100W
Newhaven	TQ 4460 0008	25m	Cardioid on 30 degrees ETN	New	100W
Lewes	TQ 41358 09952	13m	Co-linear	New	15W

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 dBµV/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).



East-Sussex-Digital-
Radio-Coverage-Ma

East Sussex Digital Radio - Coverage (63dBuV/m)



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 ITU-R Rec P.1546-2 (Coordination)

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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):

East Sussex Digital Radio Ltd.

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

14371874

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:

Sussex Media Centre
Unit 4 Regent Business Centre,
Jubilee Road,
Burgess Hill,
West Sussex,
RH15 9TL

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

Yes (delete as appropriate)

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):

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Full name of individual	Correspondence address ¹	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Daniel Alexander Julian Nathan	11 Old Steine, Brighton BN1 1EJ	United Kingdom	<p>Brighton & Hove Radio Ltd; Festival Online Ltd; Festival Productions Ltd; OpenDAB Brighton & Hove CIC; OpenDAB C.I.C.; Platform B Ltd (Radio broadcasting)</p> <p>Brighton & Hove Digital Radio CIC; Digital Radio West Sussex Ltd; Hastings Digital Radio CIC; South of the River Digital Radio Ltd (SSDAB Multiplex Applicants)</p> <p>Old Court House Residents Ltd; Parochial Mews & Flats Courtyard Ltd (Residents property management)</p> <p>Valley Gardens Forum CIC (Professional membership activities)</p> <p>Hopshire Investments (Real estate lettings)</p> <p>Langham Trading Ltd (Textile agents)</p>	-
Allan Moulds	Unit 4, Regent Business Centre, Jubilee Road, Burgess Hill, RH15 9TL	United Kingdom	<p>Directorships:</p> <p>Sussex Living Ltd; Beacon Media Ltd (Magazine Publishers)</p> <p>EJA Property Limited; Hexad Property Limited; EJA Holiday Property Limited (Property development)</p> <p>Old Wesleyan Chapel Freehold Ltd (Freehold Management Company)</p> <p>Total Sense Media Ltd; Isle Of Wight Radio (Media holding companies)</p> <p>Isle Of Wight Radio Ltd (Radio station Isle of Wight)</p> <p>Sovereign Radio Ltd (Radio Station Eastbourne)</p> <p>Arrow Fm Ltd (Radio Station Hastings)</p> <p>Splash FM Ltd (Radio Station Worthing))</p>	Chief Executive - Total Sense Media

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

			<p>The Letting People Ltd (Letting Agency)</p> <p>Media Sound Ltd (Radio Station Mid Sussex)</p> <p>Ability Promotions 2022 Ltd (Magazine publisher: Living with Disability Magazine)</p> <p>Digital Radio West Sussex Ltd; Central Sussex Digital Radio Ltd; Hastings Digital Radio CIC (SSDAB application companies)</p>	
Rashid Mustapha	Address 1A Bath Street, Brighton, Sussex BN1 3TB	United Kingdom	<p>Directorships:</p> <p>Brighton & Hove Digital Radio CIC; Hastings Digital Radio CIC; East Sussex Digital Radio Ltd; Derby Dab Ltd; Mk Digital Media Ltd; North London Digital Ltd (SSDAB application companies)</p> <p>OPENDAB C.I.C.</p> <p>OPENDAB BRIGHTON & HOVE C.I.C.</p> <p>DIGRIS LTD</p>	Chief Technology Officer – Digris Ltd.
Nicholas John Mallinson	Unit 3 The Courtyard, Saxon Lane, Seaford East Sussex BN25 1QL	United Kingdom	<p>Directorships:</p> <p>Seahaven FM Broadcasting Ltd. (Radio Station)</p> <p>Hastings Digital Radio CIC (SSDAB application company)</p>	Managing Director – Seahaven FM Broadcasting Ltd.

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
Total Sense Media Limited	64	*	*	32
Saratoga Realisations Ltd	50	*	*	25
OpenDAB Brighton & Hove CIC	36	*	*	18
Seahaven FM Broadcasting Ltd	30	*	*	15
Hailsham FM Limited	10	*	*	5
Platform B Ltd	10	*	*	5
Comments				
<p>This bid is constructed in isolation in relation to company structure and share allocations. *Share value is nominal.</p> <p>If our consortium is awarded the multiplex licence and also one covering a contiguous area, it is understood that the ownership structure may need to be adjusted in order to comply with regulations.</p> <p>Total Sense Media Ltd (TSM) broadcasts two services (More Radio and More Radio Retro) on the Sussex LRMS in 56k mono DAB. TSM sees value in delivering their services via small-scale to population centres in DAB+ stereo, while maintaining their wide area coverage to legacy DAB receivers via the LRMS. The granular coverage of small-scale multiplexes presents a useful business case though enabling localised splits, in a similar manner to those performed with the existing FM networks.</p>				

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)
N/A		

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	
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	
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	

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.

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 (delete as appropriate).
- b) Has the applicant ever held an Ofcom broadcasting licence before?
No (delete as appropriate).
- c) Has anyone involved in the proposed service held an Ofcom broadcasting licence or been involved in an Ofcom-licensed broadcast service before?
Yes (delete as appropriate).
- d) Does the applicant control an existing Ofcom licensee?
No (delete as appropriate).
- 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 (delete as appropriate).
- 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 (delete as appropriate).
- 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 (delete as appropriate).
- 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 (delete as appropriate).
- 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 (delete as appropriate).

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)	CR101283BA/1	Gaydio Brighton
	DSP000067	Gaydio (London, Manchester, Brighton)
	CR000186BA/2	Gaydio Manchester
	AL000211BA/6	Juice 107.2 Brighton
	CR101275BA/1, DP102703BA/1	Platform B
	DP101070BA/1	Slack City Brighton (formerly totallyradio)
	SSDABWT012	Trial of Brighton DAB Multiplex
	DP 102388BA/1	More Radio
	AL100286BA/4	More Radio Worthing
	AL000278BA/1	More Radio Eastbourne
	AL100761BA/1	More Radio Hastings
	DP 102388BA/1	More Radio Retro DSP licence
	AL000263BA/1	More Radio Mid Sussex
	AL00044BA/2	Isle of Wight Radio
	CR000211WT/6	Seahaven FM
	CR101277BA/2	Hailsham FM
	DP000075BA/7	10-fi.com (aka Test MCR)
(d)		N/A
(e)		N/A
(f)		N/A
(g)		N/A
(h)		N/A
(i)		N/A

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 (delete as appropriate).

If yes, please provide the following details:

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

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.

Our 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.

East Sussex Digital Radio Limited proposes to reach a predicted 79% of the population within the polygon. This will be achieved by matching the areas served on FM by the two existing community radio stations and is supported by the mapping in section 2.3, above.

The plans include a relay site to enhance coverage in the county town of Lewes. Should this not, in the event, be viable a very small proportion of the population will be impacted.

Whilst there will be some overlap, the terrain of the South Downs between the two transmitters will leave some sparsely populated areas in the Cuckmere valley with patchy coverage. To provide filler transmitters at this stage, each only covering a small population, is not financially viable at this stage.

Resilience is provided by our technical partner *digris* Ltd. which holds spares at its UK Operations Centre which is only 25 miles from the furthest transmitter,

The largest set up cost relates to the purchase and installation of equipment by contracted qualified engineers.

Capital costs have been informed by our technical partner's experience in the Brighton trial. 16% has been added to this estimate as working capital.

High Level Estimate of Capital Expenditure

Core and ancillary equipment (x2)	£22,848
1x relay core and ancillary equipment	£4,000
Installation commissioning etc	£4,000
Planning network sites and equipment	£5,000
Rigging	<u>£2,800</u> +
Total Cap ex	£38,648
Working capital	<u>£6,352</u> +
Total Loan	<u>£45,000</u>

Annual operating/running costs have been informed by our technical partner's experience in the Brighton trial and the known costs already incurred by one of the community stations at both the main two sites.

High Level Estimate of Annual Running Costs

Total	£20,740
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3.18 Please indicate how the costs outlined in 3.17 (above) will be met, under the following headings:

- a) Share capital *(Nominal share capital)*
- b) Loan stock
- c) Leasing/HP facilities (capital value)
- d) Bank overdraft
- e) Grants and donations
- f) Other (please specify) *Capital will be 100% funded by loans from shareholder organisations, two of which have also agreed to pay their first year's carriage costs in advance. Running costs will be met by charges to service providers.*

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 (£)
Total Sense Media	32%	£20,000
OpenDAB Brighton & Hove	18%	£10,000
Saratoga Realisation LTD	25%	£15,000

- 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 signed Memoranda of Understanding between East Sussex Digital Radio Ltd and each lender.

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 6.

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.)

Nick Mallinson - director

Nick has been responsible for the day-to-day general management and station management of a community radio station and its transmission system for more than a dozen years. The system currently includes transmitters at two of the sites selected by East Sussex Digital Radio Ltd.

Since 2006, Nick has been the driving force behind the station and oversaw its expansion into Eastbourne during the pandemic, following a successful application to Ofcom for a licence extension.

His experience of building an organisation from its inception to maturity will be invaluable.

Nick will manage the day-to-day service, including liaison with the technical partner (*digris* Ltd.) which will be contracted to deliver the multiplex service (please also see section 3.2.2, below) and with the programme service providers, many of whom are already known to him through his community radio networking.

Rash Mustapha - director

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 over a quarter of a century.

Involved with internet technology since 1994, Rash was a pioneer of Content Distribution Network design for streaming media. He initiated the Content Delivery Network which now delivers around 1/3rd of UK commercial radio to online listeners.

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 the design, 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 in radio broadcasting when he was awarded an MBE in 2019.

digris Ltd a subsidiary of *digris* AG is a Swiss broadcast radio engineering company which specialises in digital broadcasting 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. Among *digris* small-scale DAB projects (complete and current) are Leeds, Bradford and Manchester multi-site radio multiplexes.

Daniel Nathan - director

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.

Allan Moulds - director

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

He founded the company following a successful corporate career as Production Director for international fashion brands Jaeger and Viyella.

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 in-to 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.

Allan is also Founder & CEO of The Letting People Limited which has several branches in Sussex, as well as several companies that specialise in property development. Allan has recently acquired a stake in and become a Director of Burgess Hill Town Football Club.

- 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	<i>digris Ltd</i> , 1A Bath Street, Brighton BN1 3TB	<i>digris</i> , our technical partner, has a decade of experience operating DAB Single Frequency Networks. Their proprietary intelligent router platform (located at each transmitter site) continuously monitors ensemble multiplexer timestamps and network parameters. It establishes a secure Virtual Private Circuit back to the ensemble multiplexer headend and is able to compensate for conditions such as severe network jitter. It also provides automatic switching to backup infrastructure in the event of a fault, or maintenance. <i>digris</i> has invested in specialist DAB test equipment which is required to accurately measure all parameters needed to optimise the single transmitter site. RF probes can be installed in the network so that these essential parameters can be monitored 'off-air' remotely.
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)		

	<p><i>digris Ltd.</i> is able to offer this comprehensive service due to the operational maturity and economy of scale established by highly experienced personnel in Switzerland. New DAB networks are simply added to the existing Ensemble Multiplexing and Network Monitoring Systems that have been established in the UK, and with full backup and engineering support provided from the Network Operation Centre in Switzerland, to provide constant cover.</p>
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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:

East Sussex Digital Radio Ltd plans for its multiplex service to become operational within twelve months of the licence award.

The timetable is underpinned by several key positive factors:

- The experience of our technical partner *digris Ltd* in delivering this type of service.
- Our success in already negotiating Heads of terms with a significant number of providers.
- Our existing working relationship (through Seahaven FM) with two of the three site owners; and control (through one of our directors) of the site of the third (relay) site.
- The absence of a need for building works or planning permission/consent at any of the sites

The activities in our plan are broadly grouped into five areas:

1. Open communication with the public
2. Fair dealings with prospective service providers
3. Constructive relationships with site owners
4. High quality technical activities by an experienced partner
5. Supply of timely and accurate information to Ofcom
6. Liaison with those running other DAB systems

N.B. Our outline implementation plan (see Annex 10) will be subject to its own first activity:

“Project management to meet with key players (including technical partner) to develop the detail of this plan, dependences, critical path and milestone dates.”

- 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 10.*

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 (please delete accordingly)

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):

Seahaven FM Broadcasting Ltd is entitled to 30 shares and 15% of the voting rights.

It has an analogue licence. (CR000211BA/3). It intends to apply for a C-DSP licence.

Hailsham FM Ltd is entitled to 10 shares and 5% of the voting rights.

It has an analogue licence. (CR101277BA/2). It intends 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.

Name of service provider and station name (if known)	Proposed C-DSP or DSP	Nature of evidence of support provided
Seahaven FM Broadcasting Ltd	C-DSP	Heads of Terms and Memorandum of Understanding
Hailsham FM Ltd	C-DSP	Heads of Terms and Memorandum of Understanding
More Radio	DSP	Heads of Terms
More Radio Retro	DSP	Heads of Terms
Radio DGH	DSP	Heads of Terms
V2 Radio	DSP	Heads of Terms and Memorandum of Understanding
Ashdown Radio	DSP	Heads of Terms
Platform B	DSP	Heads of Terms and Memorandum of Understanding
Cheesy FM	DSP	Heads of Terms
Care Radio	DSP	Heads of Terms
Gaydio	DSP	Heads of Terms
Sussex Student Radio	DSP	Heads of Terms
80s Rhythm	DSP	Heads of Terms
Living With Disability	DSP	Heads of Terms
Open DAB	DSP	Memorandum of Understanding
Regency Radio	DSP	Heads of Terms
Sentimental Radio	DSP	Heads of Terms
Slack City	DSP	Heads of Terms
Total Sense Media	DSP	Memorandum of Understanding
Zest 60s	DSP	Heads of Terms

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

Confidential (service provider details disclosed to Ofcom) Electronic Music	DSP	Heads of Terms
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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?

Measures Taken to Date:

Significant general awareness has been raised in the UK radio industry through the publicity surrounding the Small-scale radio multiplex trials and roll out thus far.

In the Eastbourne, Newhaven and Lewes area, the local Community Stations (Seahaven FM and Hailsham FM) and the Commercial Station (More Radio) came together with others, particularly those in Sussex having relevant experience, to form a company to make this application.

Support has been received from the local MP (Eastbourne) in the form of a letter.



East Sussex Digital Radio Ltd has announced its intention to bid for the new DAB radio multiplex licence covering Eastbourne, Newhaven, Hailsham and Lewes. The licence is being advertised by Ofcom with any new services likely to be on-air in 2024.

East Sussex Digital Radio is made up of OpenDAB Brighton & Hove, who pioneered low cost digital radio transmission in the UK - and since 2015 have run the Brighton DAB trial licence, Total Sense Media, operator of local radio stations across Sussex (More Radio/More Radio Retro) for over twenty years and well-established community stations Seahaven FM and Hailsham FM.

The application is also being supported by other established digital radio stations including Gaydio and V2 Radio.

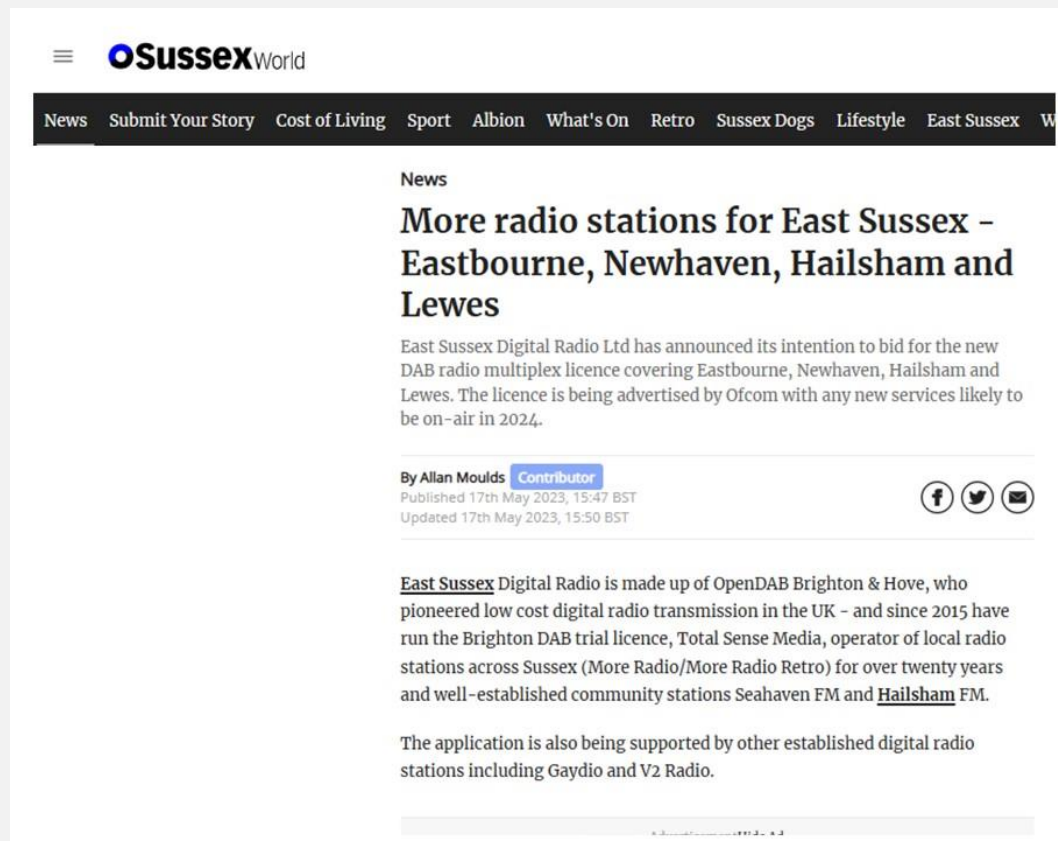
A spokesperson for East Sussex Digital Radio commented, "We believe we have the ingredients to run a successful DAB radio multiplex for the area: our group has the community connection, the commercial track record across the region and the deepest knowledge of digital radio technology. The proposed service could carry more than twenty new and existing radio stations, significantly and innovatively increasing listener choice."

Other commercial and community radio services keen to reach Eastbourne, Newhaven and Lewes are encouraged to support the bid and apply for carriage on this exciting new broadcast platform, registering their interest at eastsussexdab.org.uk

For more information contact Allan Moulds allan.moulds@eastsussexdab.org.uk

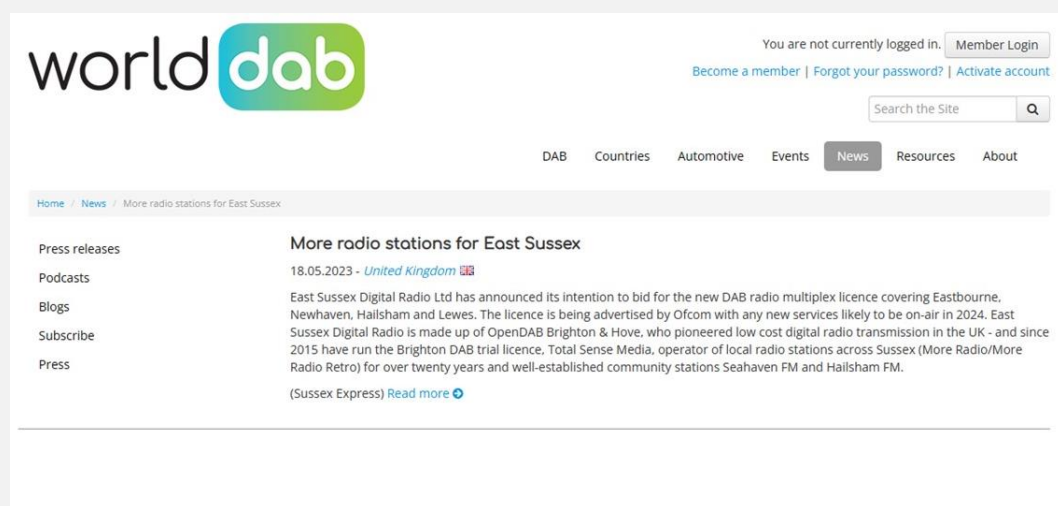
East Sussex Digital Radio Ltd publicised its intention to make an application through a website and a press release. It also contacted potential programme service providers across this and the surrounding areas which is best demonstrated by the 19 signed Heads of Terms agreements from providers.

The Heads of Agreement document (and in some cases the Memoranda of Understanding document) which have been used with all prospective programme service providers have common terms for all users and show indicative charges. These are substantially discounted for the community radio (C-DSPs) and discounted for locally-based DSPs.



The screenshot shows a news article on the SussexWorld website. The page has a dark navigation bar with the following links: News, Submit Your Story, Cost of Living, Sport, Albion, What's On, Retro, Sussex Dogs, Lifestyle, East Sussex, and W. The article title is "More radio stations for East Sussex – Eastbourne, Newhaven, Hailsham and Lewes". The author is Allan Moulds, a contributor, and the article was published on 17th May 2023 at 15:47 BST. The article text states: "East Sussex Digital Radio Ltd has announced its intention to bid for the new DAB radio multiplex licence covering Eastbourne, Newhaven, Hailsham and Lewes. The licence is being advertised by Ofcom with any new services likely to be on-air in 2024." It also mentions that the application is supported by other established digital radio stations including Gaydio and V2 Radio. Social media sharing icons for Facebook, Twitter, and Email are visible.

The announcement has been shared by media.



The screenshot shows a press release on the worlddab.com website. The page has a white background with a green and white logo for "world dab". The navigation bar includes links for DAB, Countries, Automotive, Events, News, Resources, and About. The article title is "More radio stations for East Sussex" and it was published on 18.05.2023 in the United Kingdom. The text of the press release is identical to the article in the previous screenshot. A "Read more" link is provided at the end of the text.

Measures Planned for Before the Licence Period Begins:

A number of measures would follow successful application. These will include, but not be limited to:

- Further engagement with those stations with which we have either a signed Heads of Agreement document or a Memorandum of Understanding. This will help prepare these providers for the commencement of the service;
- Revisiting those who initially contacted but did not proceed to make an agreement with East Sussex Digital Radio Ltd prior to application;
- Reviewing any unsuccessful applications made for this and surrounding areas. This will give any potential programme providers whom they had engaged a fair opportunity to engage with East Sussex Digital Radio Ltd;
- Using the East Sussex Digital Radio Ltd website and further publicity in the local media and in radio media (including social media) to continue to increase awareness of the licence, relevant costs, relevant dates, progress and contact details to encourage further engagement.

As the plan to establish the service is implemented a publicly available Rate Card will be published on the East Sussex Digital Radio Ltd website. This will include discounts available for different types of provider, different company forms, the relative localness to the Eastbourne, Newhaven and Lewes area and the relevance to the communities in the area.

The learning and experience of licencees already delivering small scale digital radio multiplex licence services will be sought and our plans updated to take account of what we find to ensure that we deliver the fair and effective competition in our provision.

Initial allocations will be then made against these criteria and a waiting list created if necessary. Both will be regularly reviewed against the criteria.

Measures Planned for the Licence Period:

Most of the above activities will continue. East Sussex Digital Radio Ltd will also have regular meetings with programme providers using the service.

In addition, we will prompt or engage in conversations with other licencees to mutually share our combined learning and experience. We will continue to revise the way in which we work on the basis of this to ensure that we continue to deliver fair and effective competition in our provision of the service.

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:

NICHOLAS JOHN MALLINSON

A handwritten signature in black ink, appearing to read 'N. J. Mallinson', written in a cursive style.

Date of application:

30th June 2023

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

Company director.