
Small-scale radio multiplex licence

Application form – Part A (public)

NORTH LONDON DIGITAL



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

NORTH LONDON DIGITAL

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

NORTH LONDON

1. Overview

NORTH LONDON DIGITAL



Extent of proposed coverage area

- The extent of our proposed coverage equates to 95% of the advertised area population
- A complex terrain pattern necessitates a six-site network to overcome coverage issues
- A technical plan that minimises signal level beyond the advertised area

Ability to establish the proposed service

- A multicultural board of director/investors has appointed a management group of five to establish and maintain the service
- Our operations management group comprises three directors and two highly experienced executive managers
- More than adequately financed, North London Digital's directors combined skillset, is high enough to competently deliver a DAB network for North London
- Digris, our technical partner and investor provides resource, pedigree and competency in the design, install, monitoring & maintenance of a fully compliant network
- A Net Zero emissions transmission network - the first in the UK

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

- 45% of shareholder voting power rests with four C-DSP participants
- Community radio has a 40% 'voice' in the Boardroom
- Eight services will apply for C-DSP licences
- 45 services in total, have signed provisional agreements for carriage

Fair and effective competition

- North London Digital has reached out directly to 154 radio services
- Industry-wide advertising and editorial, our own website and direct marketing were the tools we used to communicate our objectives and engage with potential providers
- Transparent pricing and common terms underpin our written policy which we will publish when we start trading
- We will not charge more than our published rate card rates and we shall not select service providers on purely economic grounds

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):

A complex terrain pattern, substantial building clutter and interference from other spectrum users, impede the signal from transmitter to listener and seeks to compromise coverage.

North London Digital's technical plan addresses these issues in a disciplined manner which minimises overspill to adjacent areas and limits interference potential beyond the macro area.

North London Digital predicts that 95% of the adult population in the advertised area will be reached.

Coverage overview

North London Digital plans to serve the advertised area: Wembley across to Gant's Hill and broadly, from Camberwell (just south of the River Thames) northwards beyond the M25. Our technical plan delivers a robust signal into key localities throughout the polygon area.

North London terrain

The topography of this area frustrates, even, contiguous coverage, from any solus transmission site, including to some degree, transmissions from Alexandra Palace - unless high powers are employed. Our assessment suggests that 'Ally Pally' appears to be the baseline from which Ofcom has drawn this polygon and so a conundrum is created. Namely, how to meet the need to deliver coverage to all parts of the advertised area while operating within the propagation constraints imposed and set out in the licence area advertisement.

The topography of North London may be summarised as ridges of high ground stretching down into the London basin from the Northern Home Counties and also across the defined area, as below:

Chipping Barnet down to north of Edgware	East Barnet down to Finchley
Ferney Hill down to Southgate	Epping down to South Woodford
Borehamwood down to Mill Hill	West Hampstead across to Crouch End
Hendon across to Wood Green	Elstree across to Totteridge

The Lea valley makes a north-south chord through the eastern side of the advertised area while in the south, the Thames cuts across west to east. These represent the lowest levels of 'ground' in the advertised area.

Our detailed study of the terrain has focused North London Digital into providing contiguous coverage across as much of the advertised area as is practicable. We have achieved this by planning a multi-site network.

Our planned robust coverage solution

Extensive modelling has been employed for two reasons, first to ensure our plan does not have the effect of sterilising co-block reusage in neighbouring advertised areas and secondly, to ensure we deliver coverage into key population centres. We leave it to Ofcom's assessment to determine how successful we have been in limiting unwanted signals into other areas. We explore this aspect of our plan in the paragraph below. Turning to key population centres we have identified 40 such localities. From this starting point we concluded six locations which by virtue of the power sum, could deliver fully synchronised signals into these key population centres. A list of these 40 localities is set out below:

Barking	East Ham	Hendon	Stratford
Barnet	Edgware	Ilford	Tottenham
Bethnal Green	Edmonton	Islington	Wanstead
Bermondsey	Enfield	Kenton	Walthamstow
Campden Town	Finchley	Marylebone	Wembley
Chingford	Finsbury	Paddington	Westminster
City	Friern Barnet	Poplar	West Ham
Cockfosters	Hackney	Southgate	Willesden
Docklands	Hammersmith	Stepney	Woodford
East Barnet	Hampstead	Stoke Newington	Wood Green

Development of our proposed network

We have taken an evidence-based approach to the development of our proposed network.

Given the complex nature of the North London area's terrain, conventional wisdom suggests that four strategically placed transmitter sites plus an additional site serving most of the southern part of the licenced area would appear to be the most effective way to deliver, close to universal, network coverage. This was our Plan A.

As part of Plan A, a southern site located in the City of London, requires both structural height and a moderate amount of radiated power in order to deliver a robust signal into the surrounding areas which comprise substantial building clutter. While we were able to plan a way to achieve our immediate objective, the evidence we uncovered suggested, even after employing

directionality and adjusting the radiated power levels to deliver the desired even coverage across the area, that a problem had been identified. We discovered there was a strong likelihood of an unacceptable amount of interference manifesting itself elsewhere within the macro area as 63dB μ V/m overspill, and beyond the macro area as a 38dB μ V/m unwanted signal.

Our study of differing coverage predictions indicated that this Plan A approach was flawed because while we had met one aspect of our technical plan - the extent of coverage, we had fallen short of the requirement to develop a plan that observed other requirements published in the licence advertisement.

A fresh approach was required - Plan B.

Ofcom's Guidance Notes considers transmitter site locations and paragraph 4.45(c) states:

"Transmitters are expected to be located within the advertised licence area, although in certain circumstances a site which is a short distance outside the advertised area may be acceptable, for example if it is the most practical option for serving a particular population centre within the advertised area".

One such location of usable elevated ground that could serve the City of London, northwards along the Lea Valley towards Cheshunt and to Ilford on the eastern edge - a locality very much within the advertised area, was Shooters Hill. This site combined with use of an additional site in Marylebone, allowed us to ensure the whole southern segment of the advertised area was served.

As the table overleaf shows, by using Shooters Hill, we were able to improve the overall extent of coverage within the advertised area. But more importantly, we found that we could, through careful antenna choice and detailed modelling, significantly reduce the amount of overspill into neighbouring areas by as much as a quarter from our original Plan A network plan, i.e. from 20% overspill down to 15% overspill, by population.

The table overleaf compares our original 'conventional wisdom' plan (Plan A) with our proposed 'most practical option' plan (Plan B).

The practical option of using the Shooters Hill site

NETWORK CONFIGURATION			NETWORK PERFORMANCE			
			Inside advertised area		Outside advertised area	
			%	'000	%	'000
Plan A	4 sites	+ City site	94%	3,427	20%	723
Plan B	5 sites	+ Shooters Hill site	95%	3,466	15%	548

The table above shows:

- B is a practical option because it better serves the City of London, the Lea Valley and Ilford
- Generally, B serves a larger population inside the advertised area
- A creates most overspill
- B offers a reduction in overspill and with that reduces the potential to cause interference

We would also suggest that comparatively speaking, the Shooters Hill site is a short distance from the edge of the advertised area -2.9 km from an area which stretches 30 km north to south and 27 km east to west.

Finally, Plan B, also has the additional benefit to North London Digital because it halves the risk of reliance on a single transmitter serving a large proportion of the network in the event of a transmission failure. We outline our approach to resilience in Annex 5 – Network Diagram.

Notwithstanding each of the points above, we conclude that the appropriateness of the Shooters Hill site sits between two welcome dimensions. Firstly, it better serves a particular population within the advertised area, and secondly, it offers greater flexibility to Ofcom when planning options are being considered across the wider macro area and beyond, thus overall making Plan B, the most practical option.

Paddington to Edgware coverage

To the west of the advertised area, coverage challenges were presented for radio signals from a more central point directed westerly towards the polygon edge. This was seen to impact negatively on reception across an area from north of Paddington to Kenton/eastern side of Wembley and up towards Edgware. The terrain intervenes the signal path to the extent that reception is at best patchy across this area when similarly central sites were adopted. We would add that the many large structures across this area will be unlikely to improve reception for listeners.

To resolve this issue and with an additional site, we propose to further develop field strength by use of the power sum, in these desired localities which lie firmly within the advertised area. In our technical plan we propose to employ a directional antenna and transmission system on the easterly edge of Harrow. This location, shielded to the west by a higher part of Harrow Hill, is

1,800m beyond the polygon edge. From its relatively elevated position, and using directional antenna, this location enables North London Digital to resolve the coverage shortfall in the west of the advertised area.

As noted above, in a limited number of instances, Ofcom permits the location of transmitters in areas beyond the polygon edge when certain factors are addressed. In this case the factors are:

- the close proximity to the polygon line,
- the requirement to provide an adequate level of service to particular population centres within the advertised area,
- the use of terrain shielding and
- the employment of antenna directionality.

When considered as a whole, we trust Ofcom will accept that these factors make our east Harrow site a practical option and so on this basis we have included it into our technical plan.

Description of the network

Our planning concludes that we can serve the localities listed in the table above through the employment of six sites: Harrow and Hendon in the west, Barnet and Southgate in the centre and Marylebone and Shooters Hill across the south. The nature and combination of these sites also ensures that robust levels of field strength are achieved not only in the more densely populated areas but in heavily built-up areas where building clutter is prevalent, particularly in The City and to the east of Wembley.

In these cases, high field strength is also an important characteristic because demands on the spectrum in London, by other users is high, and with this high demand comes the unintended consequence of greater interference from these other users to broadcasters.

While not an award criteria, we are pleased to note that our Barnet site serves major roads including the important A1/M25 junction, a popular route for many North London commuters.

It is estimated that 29% - over 1 million adults, can expect to be served by more than one transmitter in our 6 site network. We will avoid destructive interference in the overlapping coverage area (and beyond) because our transmission system is capable of operating reliably within the critical time window. Any deviation from nominal in the timing signals would result in automatic suppression before any interference could be caused. How we achieve this is set out in more detail in answer to [3.2 in Part B](#) of this application. Our system, installed by Digiris, is currently one of the few in small-scale DAB deployment capable of fully respecting DAB ETSI standards, presenting timed EDI packets to carefully paired transmitters and measuring all quality metrics on site and in the field. The result is a tightly controlled and hence 'drift free' Channel Impulse Response at every reception point throughout the coverage area.

In the event of a catastrophic failure at any one site, the maximum coverage loss in population terms would not be greater than 28% (measured at 63dB μ V/m) i.e. greater than 72% of the population would be able to receive our signals.

Drawing together each of these aspects, we believe our network, while maximising field strength where it matters and for good reason, still reflects a disciplined approach towards reducing unwanted signals into other areas.

Extent of our predicted coverage

The table below summarises the extent of our predicted coverage:

North London – extent of predicted coverage	Adults 15+	Percentage
Advertised area population:	3,640,216	100.0%
Predicted coverage inside polygon:	3,465,551	95.2%
Predicted coverage outside polygon:	548,459	15.1%
Local DAB service 1. LRMS: London:	10,102,817	100.0%
Predicted population coverage inside LRMS:	4,014,010	39.7%

Outside the advertised area

It is inevitable that when seeking to serve up to the edge of Ofcom’s polygon line, some receivable signal will spill onto neighbouring areas. In our plan, any overspill occurring, is as a result of an engineering-led approach to serve the population within the polygon area.

Identifying the extent of overspill in our early planning stages we have used directionality and reigned-in radiated power levels to constrain the impact of our technical plan on other users of the spectrum.

Minimising the signal level that our technical plan puts into adjacent areas

Similarly, at 63dB μ V/m, beyond the advertised area’s polygon line, our signal has been carefully engineered to minimise serving localities in neighbouring polygons. The extent of such overlap has been kept to 15% of the advertised area total.

Outside the macro area

With localities such as Tring being in the order of 30 kilometres from the polygon line, we have plotted our service at 38dB μ V/m. We are confident that our technical plan will be regarded as compliant and that it will not deliver significant interference into areas outside the macro area. While, however, a minor patch of high ground east of Tring was noted at 38dB μ V/m, closer inspection suggests that this area, beyond New Mill, is to a great extent unpopulated.

Sussex and Oxfordshire - 10B

The detailed transmission network and hole-punching assessments submitted by North London Digital are based upon the likelihood of spectrum in sub-band II being allocated.

It is, however, acknowledged that the final spectrum allocated (to at least one polygon within the London and the South East macro area) may fall within sub-band III - block 10B in particular. We note that this block is in use for both the Sussex and Oxfordshire LRMS.

We have considered this alongside our proposed technical plan and we are pleased to confirm that meeting the more stringent interference restrictions can be achieved by applying some changes (to some sites) including power levels and antenna directionality. While this is unlikely to cause risk to the viability of the North London Digital proposal for the North London area, some potential loss of population coverage can be expected and this in turn can be likely to result in a negative impact to some citizens and consumers as they experience a less robust listening experience.

Potential for hole-punching

In planning coverage and developing this technical plan we have made allowances to isolate the common causes of ACI. The selection of sites, positioning of antenna and an understanding of the prevailing field strengths from existing multiplex operators have been factored in to our technical plan. For example, where residential housing units are nearby a selected site, we have used height to ameliorate potential impact.

Additionally, Digris, in partnership with a leading DAB technology company, has developed a low-cost 'micro-site' transmitter. This innovation is a multi-block modulator and power amplifier that has been designed for small-scale DAB applications, gap filling and ACI repair. The unit can be operated as stand-alone to augment coverage and/or utilised to provide coverage repair in the unlikely event that a significant ACI issue is detected.

Potters Bar, Cheshunt and Waltham Cross (Broxbourne)

These three areas each north of the M25 are shown inside the Ofcom polygon line. It appears their inclusion may be due to the Alexandra Palace transmission site being used as the nominal point to define the Ofcom advertised area, by population.

For reasons set out in Ofcom's licence advertisement, using Alexandra Palace to reach north of the M25 is inappropriate as the outgoing interference criteria would not be met. Turning to the scale of impact, Potters Bar, Cheshunt and Broxbourne have a total population of 55,251 this equates to 1.5% of the advertised area.

Prior to considering to build our multiplex transmission network further north, North London Digital researched each area in turn in order to establish to what extent there was any affinity between Potters Bar, Cheshunt and Broxbourne and North London.

We can share our more detailed conclusions with Ofcom on request, a summary is shown below:

Potters Bar formerly part of Middlesex was transferred to Hertfordshire Council in 1965. It is part of the Hertsmere parliamentary constituency. When contacting Potters Bar Radio, the former station manager highlighted Welwyn Garden City (further north and further away from London) as a 'go to' place for shopping.

Cheshunt lies within the London Metropolitan Area but is officially recognised as a town of Hertfordshire.

Broxbourne part of the local government district within Hertfordshire is officially recognised as a non-metropolitan district.

Cheshunt and Broxbourne are parts of the parliamentary constituency of Broxbourne.

The police and fire services for Potters Bar, Cheshunt and Broxbourne are provided by Hertfordshire County Council while the ambulance service is provided by the East of England Ambulance Service.

As a concluding part of our research, we contacted the Chambers of Commerce for these localities but they did not provide any tangible links between their areas and the North London area. Beyond being part of London's wider commuter belt, which when considering London as a whole, commonly extends in all directions beyond the M25, such as to Guildford, St Albans or Sevenoaks, for example, we were unable to find an affinity between Potters Bar, Cheshunt and Broxbourne and the North London conurbation.

Our conclusion was that given that Potters Bar Radio had ceased broadcasting, and the operators for that service had little faith or enthusiasm in small-scale DAB, declining to become involved in North London Digital's project; and also taking full account of the other relevant points summarised above; the conclusion was reached to focus signal coverage on the most densely populated parts of the advertised area. However, as may be noted from our coverage map, parts of each area will still receive a serviceable signal at 63 dB μ V/m.

Loughton

Loughton is on the eastern part of the advertised area, geographically shielded by high ground stretching between Woodford and Epping. It is part of Epping Forest District and Essex County Council and sits within two Ofcom advertised areas – North East London & South West Essex, and North London. It has a total adult population of 25,445 (2011 Census) which represents 0.7% of the North London advertised area. While we have not found any tangible reason to graft this locality onto our North London technical plan, we could consider establishing a low power relay at a later date. However, this in turn creates an additional matter for consideration. We note that inclusion of serving the Loughton area would increase our overlap of London LMRS up to the 40% limit and such a proposal, may not meet regulatory approval.

Similarly, a coverage extension into Broxbourne and Potters Bar (as referred to earlier in this section) might well meet with the same policy constraint.

Conclusion/summary

Our predicted coverage reaches 3.5million adults (95.2%) inside the North London advertised area.

Our bold approach delivers strong and relatively even coverage across this area after making allowances for the complex terrain pattern.

In addition, following our testing of different options, we have been able to create a technical plan that we believe is sympathetic to other users of the spectrum. Although at first glance our proposal may appear radical, we trust that it may be seen that by constraining overspill to 15.1% our plan can better facilitate Ofcom's wider planning objectives.

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

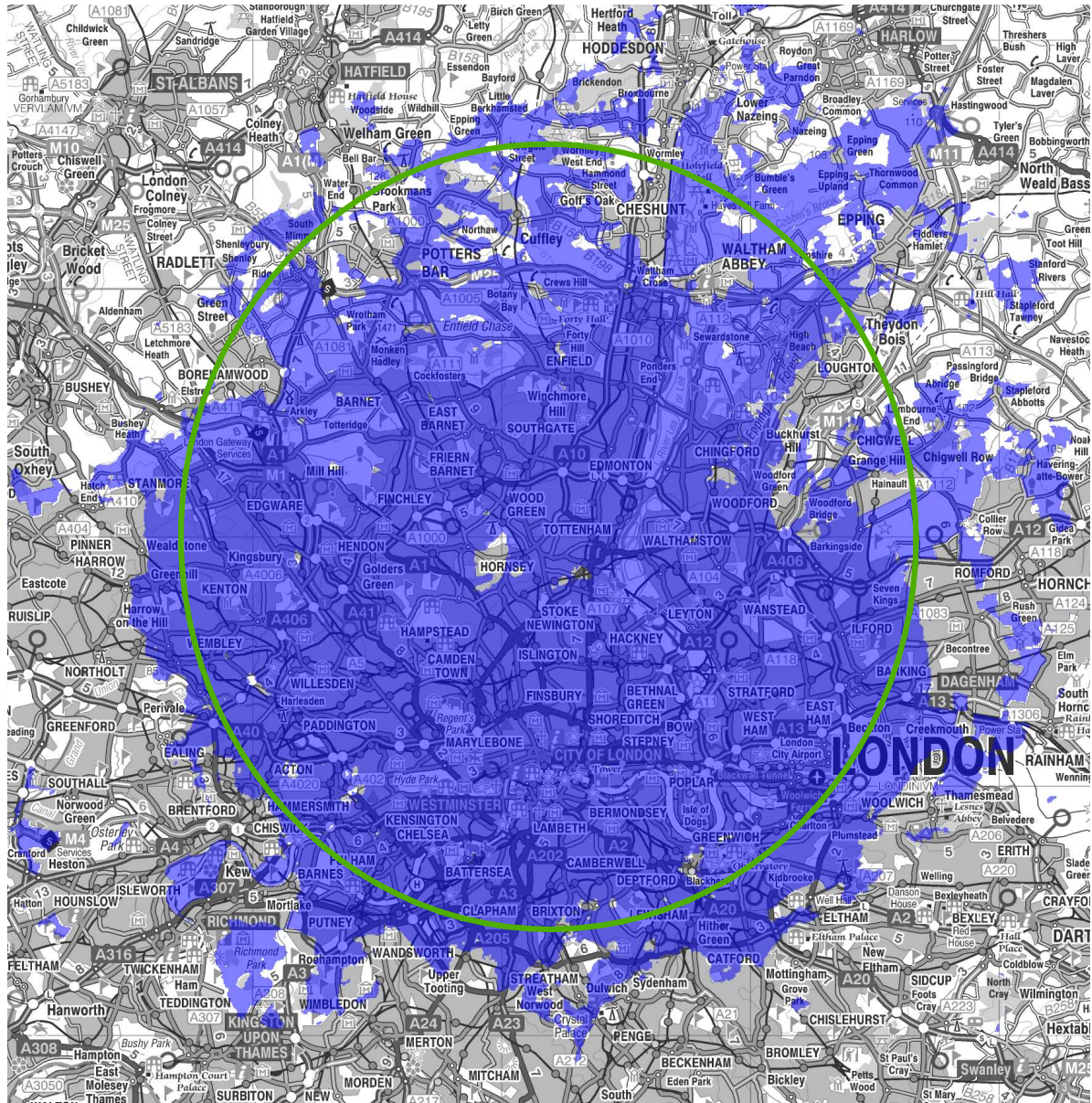
Site name	NGR	Antenna height (m agl)	Antenna type proposed with bearing	New or existing antenna	ERP (W)
University of Westminster Harrow Campus	TQ162878	36m	Log Periodic 90 degrees ETN	New	320W
Hendon	TQ235891	53m	2 tiers, dipole 60 degrees ETN	New	130W
Barnet	TQ246966	18m	3 tiers, dipole 0 degrees ETN	New	100W
Southgate	TQ297941	27m	2 tiers, dipole 30 degrees ETN	New	230W
University of Westminster Marylebone Campus	TQ 281819	70m	3 tiers, dipole 40 degrees ETN	New	240W
Shooters Hill	TQ438767	26m	3 tiers log periodic 310 degrees ETN	New	370W

As may be seen above, two sites show an effective radiated power in excess of 300W. This is to ensure that some pockets of diminished coverage inside the advertised area do not become unacceptably enlarged by a power reduction.

To compensate for the increased level of e.r.p. we have used very directional antenna patterns that will minimise out of polygon coverage, even though in two cases, the sites themselves are on the outside edge of the advertised area. This is because, when compared with a higher, more central site that spreads signal right over the polygon from within, the use of peripheral sites pointing towards the centre, lowers the level of overspill, as set out in the 'Shooters Hill' table in the previous section (2.1) above.

In areas such as London, there is the highest demand placed on spectrum usage. Here, relatively high field strengths are required to protect against blocking by both fixed and mobile transmitting apparatus. The levels of field strength produced from our technical plan offers, to some degree, this necessary protection.

2.3 Please provide below a coverage prediction map for the whole transmitter network you are proposing to build within 18 months if you are awarded a licence. The map should show the 63 dB μ V/m field strength and the advertised small-scale DAB licence area contour. [Small-scale DAB](#)



digiris

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 2023.3 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
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?	Rash Mustapha Digris Ltd

3. Ability to establish the proposed service

Applicant's details

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

North London Digital Ltd

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

14487625

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:

84 Westbourne Park Road, London W2 5PL

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
Ivor Etienne	84 Westbourne Park Road, London W2 5PL	UK	<u>Director:</u> Bang Media and Entertainment Ltd <i>Radio Broadcasting</i> <u>Director:</u> Ultra Media Productions Ltd <i>TV Production</i>	<u>Consultant:</u> Order My Steps / Ruach City Church
Paul Savvides	84 Westbourne Park Road, London W2 5PL	UK	<u>Director:</u> GreekBeat Radio Ltd <i>Radio Broadcasting</i> <u>Director:</u> Praxis Records Ltd <i>Recording & publishing</i> <u>Director:</u> Praxis Entertainment Ltd <i>Media</i>	
Ian Wallace	84 Westbourne Park Road, London W2 5PL	UK	<u>Director:</u> Gaydio Digital Ltd; Gaydio Brighton Ltd <i>Radio Broadcasting</i> <u>Director:</u> Gaydio Community Interest Company <i>Radio Broadcasting</i> <u>Director:</u> St Wilfrids Management Company Ltd <u>Director:</u> Derby DAB Ltd	

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

			<p><i>Dormant applicant company</i></p> <p><u>Director:</u> Brighton & Hove Digital Radio CIC</p> <p><i>Dormant applicant company</i></p>	
Rajan Parmar	84 Westbourne Park Road, London W2 5PL	UK	<p><u>Director:</u> Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) <i>Radio Broadcasting</i></p> <p><u>Director:</u> Spice Entertainment Ltd <i>Radio Broadcasting & Hospitality</i></p> <p><u>Director:</u> Infocus Digital Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Sunrise Radio Gold Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Bradford Digital Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> East Manchester DAB Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> MK Digital Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> BBD Digital Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Derby DAB Ltd <i>Dormant applicant company</i></p> <p><u>Trustee:</u> Alan Foster Trust <i>Charity</i></p>	<p><u>Executive Director</u> Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire)</p>

<p>Matthew Paul Ramsbottom</p>	<p>84 Westbourne Park Road, London W2 5PL</p>	<p>UK</p>	<p><u>Director:</u> Oldham FM Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Oldham Chronicle Ltd <i>Publishing</i></p> <p><u>Director:</u> Credible Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> East Manchester DAB Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Derby DAB Ltd <i>Dormant applicant company</i></p> <p><u>Director:</u> MK Digital Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Sound Kitchen Manchester Ltd <i>Hospitality</i></p>	<p><u>MD</u> Oldham FM Ltd</p>
<p>Rashid Mustapha</p>	<p>84 Westbourne Park Road, London W2 5PL</p>	<p>UK</p>	<p><u>Director:</u> Digris Ltd <i>DAB Transmission</i></p> <p><u>Director:</u> Opendab C.I.C. <i>Radio Broadcasting</i></p> <p><u>Director:</u> MK Digital Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Derby DAB Ltd <i>Dormant applicant company</i></p> <p><u>Director:</u> Opendab Brighton & Hove C.I.C. <i>Dormant applicant company</i></p>	<p><u>Chief Technology Officer</u> Digris Ltd</p>

			<p><u>Director:</u> Hastings Digital Radio CIC <i>Dormant applicant company</i></p> <p><u>Director:</u> East Sussex Digital Radio Ltd <i>Dormant applicant company</i></p>	
Paul Boon	84 Westbourne Park Road, London W2 5PL	UK	<p><u>Director:</u> Manchester DAB CIC <i>Radio Broadcasting</i></p> <p><u>Director:</u> Opendab C.I.C. <i>Radio Broadcasting</i></p> <p><u>Director:</u> City West Digital CIC <i>Radio Broadcasting</i></p> <p><u>Director:</u> Derby DAB Ltd <i>Dormant applicant company</i></p> <p><u>Director:</u> MK Digital Media Ltd <i>Radio Broadcasting</i></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.)

Our approach to ownership and participation

From the outset North London Digital has sought a broad and near-even ownership profile. Through this approach participants in this company share the risk and responsibility and have, pro-rata, an equal and with that effective, say in how the company is run.

We have deliberately avoided a top-down ownership model where there is a single concentration of share ownership and voting power, shored up by a directorship of closely connected individuals able to vote en masse to achieve the desired objectives of a few.

We have also avoided offering nominal share ownership of questionably meaningless value, as a front to give an appearance of broad participation. For example, no participant holds fewer than 5% of voting shares. Similarly, as an illustration, while Bang Media/The Beat, have contributed to our licence application fund, they also hold a 15% stake in the company and through Ivor Etienne have a seat on the Board. On award, they have promised to loan the company £17,500 and will naturally have a say in how that money is spent. Thus, demonstrating participation in a practical way.

As the table below shows, in North London Digital, five participants are taking an equal 15%. For us, this collegiate approach embraces the true meaning of participation.

Full name of participant (existing and proposed)	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Betar Kendro - Betar Bangla	5	£5.00	5%	5%
GreekBeat Radio	10	£10.00	10%	10%
Bang Media & Entertainment – The Beat	15	£15.00	15%	15%
Gaydio CIC	15	£15.00	15%	15%
Infocus Digital Media	15	£15.00	15%	15%
Credible Media	15	£15.00	15%	15%
Digris	15	£15.00	15%	15%
Paul Boon	5	£5.00	5%	5%
Lawrence Galkoff Associates	5	£5.00	5%	5%

Comments on the table above

45% of the shares in North London Digital are held by eligible community C-DSP licensees.

Community Radio has a 40% 'voice' in the North London Digital boardroom.

With one exception, all participants, live, work or have lived or worked for significant periods of time, inside the advertised area.

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 No bodies control or are controlled by the applicant North London Digital		

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 No bodies control or are controlled by the applicant North London Digital		

- 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 No bodies control or are controlled by the applicant North London Digital	

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 No bodies control or are controlled by the applicant North London Digital	

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 No bodies control or are controlled by the applicant North London Digital				

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	Yes	Ivor Etienne manages Ruach City Church Radio on behalf of Order My Steps Ltd

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

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

Details of applications, licences and sanctions

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

a) Is the applicant a current licensee of Ofcom?

No

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

No

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

Yes

d) Does the applicant control an existing Ofcom licensee?

No

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

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)	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 2022
	DP000061BA	Bradford City Radio T/A Sunrise Radio (Yorkshire) (Bradford SSDAB Multiplex) - 2022 to date
	DP000061BA	Bradford City Radio T/A Sunrise Radio (Yorkshire) (Leeds SSDAB Multiplex) - 2022 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
	DP104612BA/1	Spice Entertainment Ltd – Sunrise Radio Gold (Bradford SSDAB Multiplex) - 2022 to date
	DP104612BA/1	Spice Entertainment Ltd – Sunrise Radio Gold (Leeds SSDAB Multiplex) - 2022 to date

	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
	AL000041BA/5	Choice FM (now Capital Xtra)
	AL100581BA/1	Club Asia (now Sunrise Radio London)
	CR000068BA/4	The Beat London 103.6 (also Bang Radio)
	-	Ruach Radio
	AL103881BA/1	London Greek Radio
	RSL	Betar Bangla 2008
	CR000222BA	Betar Bangla 2010 to 2019
	DS103911	Leeds Digital Media
	DS103920	Bradford Digital Media
	DS104327	Manchester DAB

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.

A detailed understanding of the audiences we will serve, together with an approach which is sensitive to both consumers and the environment, combined with resource, cost management and experience, will overall, enable North London Digital to establish the proposed service.

North London Digital is mindful of the area we propose to deliver a service to. We are acutely aware of the broad spectrum of different communities that call North London home. We have sought to work with many sectors of society and this is reflected in the composition of our Board of directors who come from diverse backgrounds. Their contributions have led to the development of our financial and business plan which stands on four pillars.

The four pillars on which we have built our business plan are:

- Delivering for consumers;
- Operating a net zero platform;
- Providing a service - to service providers, and
- Operating on sound economic principles

Delivering for consumers (listeners)

North London Digital has thoroughly researched the London radio market and assessed how a financial and operational plan can function within it.

We started by considering London's listening pattern over time. Radio listening in the Capital, according to RAJAR, has receded very slightly in the last decade by just 5% between December 2012 to December 2022. This indicates that radio listening remains resilient. Today London accounts for 206 million listening hours each week. The primary platform for radio consumption is DAB. A 43% share of all listening is attributed to DAB as this platform continues to grow. Of note, analogue AM/FM listening has fallen. In 2018 analogue listening share was 44%, it is now just 28%. Listening via a smart speaker in the Capital is shown by RAJAR to be 9% (source: Ofcom – Communications Market Report).

Next, we considered the population profile by age. The largest share of population is those of working age aged 20-64 (64%) - with Londoners aged in their 20s to 30s representing the peak. This wider age range is set to grow 6% by 2031, and underpins the fact that the Capital will continue to be a young, dynamic, mobile and diverse city.

To complete our key areas of analysis, we considered the make-up of Londoners. Today 41% of Londoners were not born in the UK while 46% of Londoners were categorised in the 2021 Census, as Black and Minority Ethnic individuals. This makes the Capital the most ethnically diverse region

in the UK. As a multicultural city we would suggest that consumers per se are better served when the tastes and interests of different communities are provided for, in this case by a variety of radio service providers each serving different target audiences. This knowledge will help us deliver for London's consumers through the differing services selected for carriage.

We have used this and other information as the basis for our understanding of consumers and the environment in which our business plan can be expected to operate. To this end we have also taken steps to ensure that North London Digital's Board and our carriage service providers too, represent London's minority groups.

A net zero platform

Central Government's net zero target aims to ensure greenhouse gas emissions are equal to or less than the emissions removed from the environment. Our transmission system which utilises six separate transmitters would be operational 24 hours per day, 365 days per year over an initial seven-year term. Our business plan makes provision to fund the offset of the amount of greenhouse gas emissions produced by our total transmission system to the extent that North London Digital will be carbon neutral.

This we believe makes North London Digital's proposed transmission system the UK's first to be carbon neutral.

Providing a service - to service providers

We are mindful of the principal requirements of the radio services we would carry. These include robust coverage throughout the licenced area, a reliable and well-engineered platform, and an arena where pricing and competitive practices are both consistent and fair.

Through Digris, our technical partner and stakeholder in this applicant company, we are perfectly placed and fully resourced to ensure our technical plan is both viable and realistic. Further, during the design and build costing stages, reflected in the business plan, we have sourced power efficient equipment that has already been proven to be reliable and capable of being integrated into a transmission system that will operate within the finest tolerances, thereby delivering a fully synchronised network of the highest standards. This approach means that while our network, by simple comparison, may not at first glance appear to be the cheapest in terms of financial outlay, it will over time, save the company money. This is why our establishment costs reflect a higher level of CAPEX.

Our carriage pricing model puts C-DSPs centre stage. North London Digital will offer subsidised carriage to qualifying C-DSP licensees of circa 50% below our standard DSP carriage rate. We realise that by not always negotiating capacity with the highest bidder may not yield the greatest revenue, it would however, go some way towards creating a more pleasing bouquet of services for London's listeners. This lower potential revenue income has been reflected in the incoming revenue aspect of our business plan.

Turning to competitive practices, we are aware that major city radio multiplexes are the most likely to launch with a full compliment of services. This means that there is a pressing need, while meeting our Fair and Effective obligations, to be mindful that a balance needs to be struck between facilitating carriage access and in some circumstances, rationing provision. To help us we will draw on the experiences of Will Jackson who, among other responsibilities, implemented Arqiva's service provider selection policy. Our own process has been formulated and this is explored in more detail in the Fair and Effective Competition section of this application.

Most importantly, in having direct oversight over the sale of all our multiplex capacity we will be in a position to implement a transparent system of carriage service provider selection. We realise that once third parties are appointed to handle carriage sales, the multiplex operator is no longer empowered to calculate to ensure that fair and effective competition prevails in the selection and engagement of programme services.

Sound economic principles

Operating costs are largely fixed and will be well known to Ofcom, so attention here is focused on carriage sales in a changing market.

North London Digital set out its indicative carriage costs at an early stage in this licence application process in an open and transparent manner. Over and above this, our pricing strategy also anticipates a scenario where there is the potential for significant multiplex market disruption.

The London market is home to three Local Radio Multiplex Services (LRMS) each primarily transmitting in standard DAB. We expect, eventually, a progression from this sector towards DAB+. The impact from this approach leads us to expect LRMS being more competitive and offering:

- Lower carriage prices for carriage customers,
- Creation of more opportunities for service providers from newly available LRMS capacity,
- Syphoning-off of SSDAB DSP carriage customers desiring a larger pan-London coverage option.

This would have the effect of placing downward pressure on SSDAB prices. Particularly for the new North, South and West London multiplexes.

We have scoped out from the start, the effects of this on our initial price-point.

In the event of such a substantial market re-adjustment, we have put in place a contingency to be able to continue to trade comfortably. We can share this plan with Ofcom, on request.

North London Digital, having assessed how the London DAB carriage market will develop, perhaps distort over the coming years, will be well placed through our adoption of sound economic principles, to adapt to a potentially volatile market situation.

Returning to costs, for this application we have divided these into two:

- necessary expenditure to establish the service and
- operating expenditure excluding borrowing costs over a given 12-month period.

Establishment of the service expenditure is broken down by individual transmitter site. This is because the costs incurred at each site are far from uniform. These costs include a contingency to absorb overruns and they anticipate the financial uncertainty surrounding the conclusion of site negotiations.

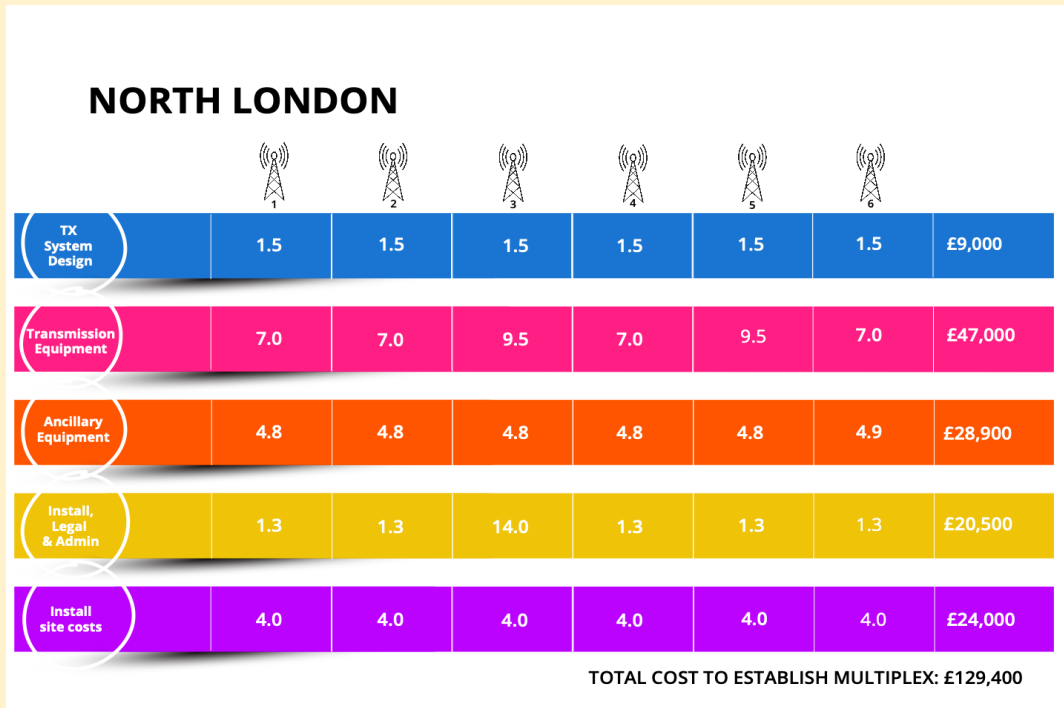
This licence application is submitted as part of Ofcom's Round 5 of SSDAB development and the experience gained from members of our group being participants or key figures in each of the earlier Rounds, means we have a high degree of confidence in the accuracy of the figures presented. This in turn has led us to devise our Operational Management Group (OMG) which will be specifically targeted to establish the service and will report to the Board. We believe that a small group of practitioners with relevant experience drawn from the preceding licencing rounds is a better way to drive forward the establishment of this service rather than a clustering together a wider group of well-intentioned individuals who may not have the depth of relevant experience required for this preliminary, but important, part of this project.

Our Capital Expenditure reflects the procurement of power-efficient equipment already proven to be reliable and capable of being integrated into a transmission system that is required to operate within the finest tolerances in order to deliver a fully synchronized network of the highest standards. We would strongly suggest that in order to satisfactorily manage a Single Frequency Network, equipment must be deployed that is able to both meet and maintain exceptionally precise specifications. To accomplish this, high quality components must be used and these inevitably will have an impact on cost.

While by simple comparison our network may appear expensive in terms of outlay, it will over the duration of the licence save the company money.

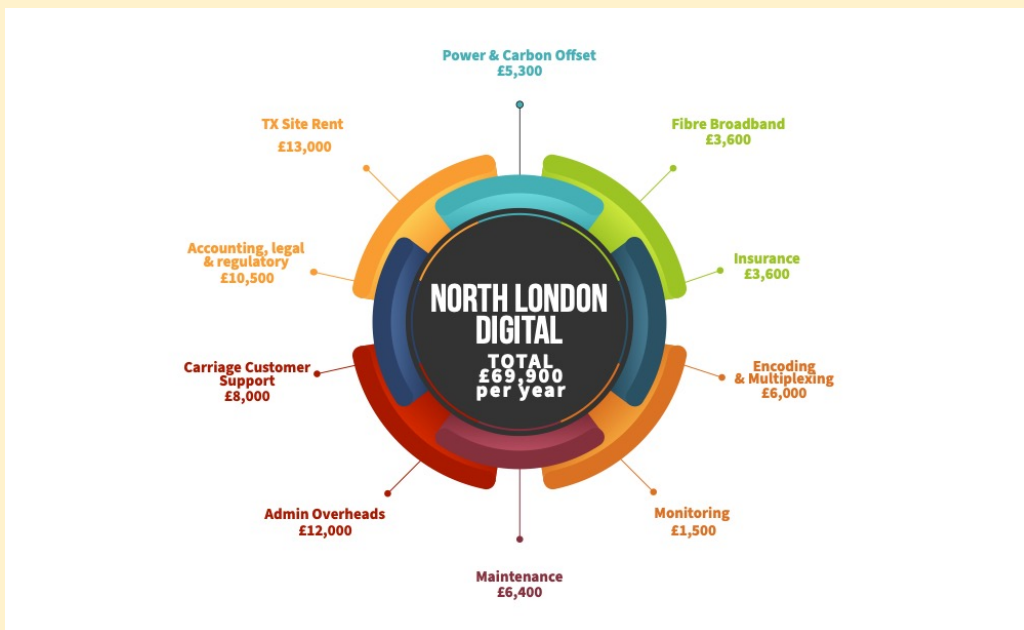
The graphic overleaf demonstrates our Establishment of Service costings.

Establishment of Service costings



In a largely fixed cost operating environment, we have set out the key areas of planned expenditure. These figures, which include our carbon offset proposal, are based on current costs, but in the event of inflationary impact on costs we have a plan to absorb a measure of these costs to enable us to hold back from immediately passing on higher charges to carriage customers. We do this because we recognise that higher carriage charges could lead to services no longer being carried on the multiplex, and this being to the detriment of consuming listeners.

The illustration below shows our whole service running costs



Excludes borrowing costs

Approaching the pan-London coverage issue

It has become very clear during this licence application process, that there is a groundswell of interest from service providers wishing to be carried on the three principal SSDAB multiplex licence areas inside the M25 (North, South and West London) in order to create a London-wide coverage opportunity. It may be argued that some of these services would be more at home on one of the three Local Radio Multiplex Services (LMRS) if these mux operator's offering, was more competitive.

In the event that the LMRSs remain uncompetitive, there is a risk, of which we are mindful, that SSDAB might become the back door for a quasi London-wide multiplex outlet, something about which the regulator might take a view.

North London Digital will prioritise capacity take-up from radio services seeking to reach the North London coverage area only. We propose to execute this in the same way that Ofcom mandates reserve capacity for C-DSP services. North London Digital will reserve 270 CU – about 50% of total DSP capacity, for service providers who can demonstrate that they are not seeking pan-London coverage. This way, we believe we can offer multiplex carriage in accordance with the Government's and Ofcom's published principles of SSDAB development.

Conclusion/summary

We have sought to demonstrate an in-depth understanding of the North London and wider London market, from consumer listening patterns to how multiplex operations could evolve. One thing is certain the North London radio multiplex licence will not operate in a bubble and because of this we need to be able to react to a potential volatility that would be outside our direct control.

Forewarned is forearmed and so we can translate our understanding of potential changes in the market that might otherwise impact substantially on any group's ability to operate, into tactical approaches, by drawing upon our closely knit group of professionals each expert in differing specialisms. From this we imbibe a level of confidence that our business plan will be adaptable enough to ensure that we can each play a vital part in being able to establish this service and maintain it in the event of prevailing pressures.

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

- a) Share capital
- b) Loan stock
- c) Leasing/HP facilities (capital value)
- d) Bank overdraft
- e) Grants and donations
- f) Other (please specify)

The amount required (as shown above) is £130,000 (rounded up) plus a working capital surplus of £8,000. Making a total of £138,000. Each participant, as a condition of their shareholding in the company, will collectively loan the company 100% of the required funds. This has been agreed in signed Memoranda of Understandings.

As an additional comfort factor, from experience we know that certain UK cities, of which London is one, will be small-scale DAB areas where supply of carriage will be outstripped by demand from radio services wishing to be carried. In such circumstances and to offer certainty to service providers, we shall offer a holding deposit scheme.

We conservatively estimate that in the early weeks following award, we would be able to secure, as a matter of routine, well in excess of £12,000 in carriage deposits. This figure being over and above the required establishment costs and working capital requirements for the company in its early days.

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 (£)
GreekBeat Radio	10%	£13,300
Bang Media and Entertainment	15%	£17,500
Betar Bangla (Betar Kendro)	5%	£6,000
Gaydio Community Interest Company	15%	£22,000
Digris	15%	£23,000
Infocus Digital Media	15%	£23,000
Credible Media	15%	£20,000
Paul Boon	5%	£6,666
Lawrence Galkoff Associates	5%	£6,666
TOTAL	100%	£138,132

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.

The funding identified above is confirmed and agreed with signed Memoranda of Understanding between North London Digital and each lender. Lending is conditional on holding a stake-holding in the company.

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.)

Well able to manage risk and ensure compliance, our team of radio practitioners, will oversee both the successful launch and ongoing operation of this proposed service.

North London Digital comprises a group of seven directors - Ivor Etienne, Paul Savvides, Ian Wallace, Raj Parmar, Rash Mustapha, Matt Ramsbottom and Paul Boon, all of whom have a stakeholding in the company. The establishment, installation and day to day management of the radio multiplex will be delegated to a team of five persons. We call this team our Operational Management Group (OMG).

The OMG will report directly to the company's Board of directors on establishment, engineering, marketing, contractual, regulatory and Fair and Effective compliance matters. This will be both during the establishment phase and ongoing, once the service is operating. The OMG will take direction from the Board of Directors.

Day-to-day activities of the OMG

Based on evidence from the small-scale radio multiplex trials and Round 1 services launched, day-to-day general management includes overseeing or working in the following areas:

Sales and contract negotiation, dealing with customer radio service providers and resolving matters arising, implementation of policy (including fair and effective trading policy), resolving faults that may develop in the operation of equipment and software, handling revenue inflows and cost outflows, accounts, completion of statutory accounting requirements and ensuring regulatory compliance. Each are areas which remain central to the day-to-day management of the multiplex.

Drawing from the experiences of trial multiplex operators, we consider the time required to carry out the variety of tasks listed above ranges from three to eight days per month under normal trading and operating conditions – more during the establishment of the service.

The members of our OMG

To meet this requirement, we highlight below, the skills brought by our three directors and two executive managers who, collectively, will report to the board and be responsible for overseeing the establishment of the multiplex.

The relevant experience of the North London Digital's OMG is set out below.

Ian Wallace - director

A founding partner in Gaydio Community Interest Company, Ian as business director has played a key role in the creation, development, establishment and growth of the radio brand, in Manchester initially, and later throughout large parts of the UK. Today, Gaydio can be heard on nine small-scale radio multiplexes.

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

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 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 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 SSDAB 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 the Leeds, Bradford and Manchester multi-site radio multiplexes.

Will Jackson – executive manager

Will Jackson is an experienced broadcast professional with over thirty years radio experience. From 2005-2008, he was Senior Radio Executive within the Content & Standards team at Ofcom working on radio broadcast licensing, including DAB multiplexes.

More recently he was Account Manager, Digital Platforms for broadcast transmission providers Arqiva, working on the day-to-day management of multiplexes, including the launch of Sound Digital and frequency changes on local muxes. Will also worked on the addition of new service providers to multiplexes, implementing Arqiva policy and other matters of regulatory compliance.

For seven years, Will was also Managing Director of AudioUK, the trade body for audio-led independent production companies, responsible for stakeholder management of over 100 member companies and with organisations such as BBC, Audible, DCMS and the Audio Content Fund.

He is now Communications Manager for WorldDAB, the global industry forum for DAB digital radio, working on the global promotion of DAB and leading a project to assess the international development of small-scale DAB.

Will is also an elected trustee of the UK Radio Academy.

Usha Parmar – executive manager

Usha, along with Raj Parmar, spearheads the Executive team at Sunrise Radio (Yorkshire) where as a director/shareholder she utilises, 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 and marketing.

Usha has made her mark over a number of decades as a highly successful radio station operator and her proven track record shows that she is more than capable of contributing to the management and establishment of the multiplex and is able to conduct successful relationships with those seeking carriage.

Together with Raj, Usha has 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 Bradford and Leeds SSDAB multiplexes, 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 are members of the consortia that were awarded the small-scale radio multiplex licences for Bradford and Leeds and are currently establishing Small-scale DAB services in Blackburn, Burnley and Darwen, Oldham and Rochdale and Milton Keynes.

Paul Boon - director

Paul is an independent radio specialist. 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.

More recently, he has developed a track-record of on-time and under budget small-scale DAB radio multiplex project delivery. He has also been successful in achieving a high rate of conversion from 'in principle' transmitter site proposals, to signing-off on fully operational transmitter site location agreements. 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	<p>Digris Ltd is a UK organisation but in mainland Europe Digris AG, a Swiss company, is a leader in the establishment and operation of what is known in the UK as small-scale DAB.</p> <p>Founded in 2012, Digris specialises in DAB, operating a network of transmitters throughout Switzerland and France. It operates 19 Single Frequency Networks and over 60 DAB transmitters ranging in power from 6 Watts to 50 kW ERP (MFNs and SFNs).</p> <p>We understand that Digris is the only small-scale DAB technical partner which has invested in, and has the know-how to operate comprehensive gold standard test equipment to optimise channel echo patterns and measure critical quality metrics, which are essential for confident SFN operation.</p>
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:

By executing a carefully planned roll-out which puts sites, supply, operations and interference resolution centre stage, North London Digital intends to be operationally live within 12 months from award.

The work of establishing this multiplex service will be undertaken by a small team of experienced individuals – the Operational Management Group (OMG).

In order to accurately assess the length of time it will take to reach full operational capability, we have identified seven elements to achieve a successful launch and incorporated these into our high-level Gantt chart. Over and above this, and based on previous small-scale DAB installations, the OMG has identified four particular areas where we have anticipated additional effort will be required, in order to meet our milestones without delay. These are Sites, Supply, Operational Management and Potential interference resolution. These are explored in turn below:

Sites

From experience, completing agreements to use transmission sites, is for a variety of reasons an objective which tends to have a longer than expected lead-time. We are fully mindful of this and have as a resource, experienced individuals each of whom will play their part in managing site owner relations and making certain that this project is not delayed unnecessarily. The nature of small-scale DAB means that some of the sites proposed are not purpose-built structures but individually owned commercial, residential or educational premises. Dealing with owners and their agents requires an appreciation of owner sensitivities and a meticulous approach to progress chasing.

Supply

The general supply of components and equipment has recently shown signs of significant improvement. However, we remain wary of the expected spike in demand for both equipment and suitably qualified engineers, in the months which will follow Ofcom's announcement of the outcome of its Round 5 assessments.

Our proposal, adopted in Manchester, of purchasing many items of equipment on award of the licence has mitigated, to a large extent, the effects of a supply pinch-point. Again, our team with experience in radio station build, as well as multiplex transmission installation, is both broad enough and deep enough to deliver our project in a timely manner. Underpinning this is the support from our transmission provider Digiris a company able to draw upon long-term partnerships founded in mainland Europe and the UK, so as to provide access to essential components.

Operational management

We shall draw on the collective skills of our OMG to ensure that draw-downs of financial resource and implementation of the timetable, along with an appropriate degree of risk management, will provide for our install and build projections to be achieved. Our target is to complete all work under budget.

Potential interference resolution

We are familiar with the potential risk of ACI and the possible amount of time that may need to be devoted to resolve this matter and so we have designed our network with care. With our technical partner and stakeholder Digris, we are also able to undertake detailed measurements and conduct our own drive-test analysis as a swift step towards evidence gathering, problem solving and resolution of such matters, should they arise.

Conclusion/summary

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 12 months from award.

Our high-level Gantt chart lists 26 key activities grouped together under seven elements.

While many individual activities (shown in brown) will be resolved within four to ten weeks, certain activities will take longer to conclude. We have indicated these in the Gantt Chart. We have shown any potential overruns in yellow on the plan.

Supported by the Gantt chart, submitted as **Annex 1**, the chart illustrates those activities, dependent upon predecessor activities being concluded, we are led to our assessment that without overruns, we can expect to be operationally live in 12 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 Gantt Chart Annex 1.

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):

Four participants in North London Digital qualify for and have undertaken to apply for C-DSP licences in order to operate their service on the radio multiplex.

These four operators collectively account for 45% of the company's voting power.

Betar Bangla

Betar Bangla was an Ofcom licenced heritage community radio station which broadcast up until 2019.

Following a change in site landlords, the charges to rent and operate Betar Bangla's AM transmission site were increased without notice by many thousands of pounds. This made this community radio service unsustainable to operate.

Added to this, Network Rail as part of Crossrail's build-out installed high voltage overhead cables nearby making the site inaccessible on health and safety grounds.

Thousands of Bengali citizens across North London were left without their community radio service. Becoming a participant in North London Digital creates an opportunity for Betar Bangla to once again reach London's Bengali community.

Betar Bangla holds 5% of voting shares in the company's shareholding. This service intends to apply for a C-DSP licence. Betar Bangla was formally licenced by Ofcom as an analogue community radio service: **CR000222BA**

The Beat

The Beat is a North London - Stonebridge and Harlesden based analogue heritage community radio service serving socially excluded groups and ethnic communities. As well as broadcasting on its own analogue frequency (103.6 FM), the service also broadcasts on London's trial SSDAB service.

The Beat holds 15% of voting shares in the company's shareholding. This service intends to apply for a C-DSP licence. The Beat is licenced by Ofcom: **CR000068BA/4**

GreekBeat Radio

GreekBeat is a well-established music and culturally focused radio station. It was an applicant for an analogue community radio licence in Ofcom's 2017 round. Today, the service with a studio base in North London can be heard online. GreekBeat serves North London's younger Greek audience.

GreekBeat holds 10% of voting shares in the company's shareholding. This service would qualify and intends to apply for a C-DSP licence.

Gaydio

Gaydio Community Interest Company has for some time seen London an important area to reach. Gaydio has been an established service in London since 2013. They are a headline media partner of events including Pride in London and work closely with events, business and LGBTQ+ people across the city. Currently being carried on the quasi-regional London III multiplex, Gaydio is seeking to explore ways that they might, in the future, serve a more tightly defined city audience, or sub-groups within its remit. The population spread, found inside the M25 better targets the radio service's audience, rather than the more extended less densely populated areas of the Home Counties, covered by the existing London mux. This is important for this community radio station and will help control costs while ensuring they can serve their existing pool of clients.

Gaydio is an analogue community licensee in Manchester and operates on several trial and small scale multiplexes across the UK and if North London Digital is awarded this radio multiplex licence, Gaydio has the ambition of establishing a studio and production facilities inside the licenced area and qualify for a C-DSP licence.

Gaydio Community Interest Company holds 15% of voting shares in the company's shareholding and would qualify to apply for a C-DSP licence. Gaydio is licenced by Ofcom: **CR000186BC/2**

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.

The extent of demand or support for the North London Digital proposal is evidenced by the 45 services who have signed up or signalled that they intend to take carriage on the radio multiplex service.

8 of these services will apply for C-DSP licences

Assuring a digital path for analogue community radio

With reserved capacity of 324CU mandated for C-DSP services, North London Digital proposes to adopt 30CU per service ³ as standard. This calculation paves the way to be able to deliver near FM quality carriage to up to 11 community radio services. This innovation allows North London Digital to provide a digital path, subject to the agreement of terms and conditions, to the remaining analogue community radio services operating within the advertised area.

Name of service provider and station name (if known)	Proposed C-DSP or DSP	Nature of evidence of support provided
Betar Kendro Ltd BETAR BANGLA	C-DSP	Signed Heads of Terms - Participant
Gaydio CIC GAYDIO	C-DSP	Signed Heads of Terms - Participant
Greekbeat Radio Ltd GREEKBEAT	C-DSP	Signed Heads of Terms - Participant
Bang Media and Entertainment Ltd THE BEAT	C-DSP	Signed Heads of Terms - Participant
The Greek Voice of London C.I.C. MY GREEK RADIO - MGR	C-DSP	Signed Heads of Terms
Platform B Ltd SLACK CITY	C-DSP	Signed Heads of Terms
University of Westminster SMOKE RADIO	C-DSP	Email
XRP Media CIC XRP RADIO	C-DSP	Signed Heads of Terms
Capacity reservation for analogue community radio services		

³ 40kbps at 32 kHz sampling, HE-AACv2 – using a more advanced audio codec than was available to the trial.

Westward Media Ltd 1AU CLASSIC HITS	DSP	Signed Heads of Terms
Akash Radio Leeds Ltd AKASH RADIO	DSP	Signed Heads of Terms
All Star Ents Ltd ALL STAR YOUTH RADIO	DSP	Signed Heads of Terms
Glow Broadcasting Limited ARL	DSP	Signed Heads of Terms
AFX Media Group ASIAN FX RADIO	DSP	Signed Heads of Terms
Asian Star Radio Ltd ASIAN STAR	DSP	Signed Heads of Terms
Bar Latina Ltd BAR LATINA RADIO	DSP	Signed Heads of Terms
Boom Radio Ltd BOOM LIGHT	DSP	Signed Heads of Terms
CCR Radio Ltd CCR RADIO	DSP	Signed Heads of Terms
Cosoro Limited COSORO RADIO	DSP	Signed Heads of Terms
African and Caribbean Business Ventures Ltd CULTURE CITY RADIO	DSP	Signed Heads of Terms
Denmark Street Radio DENMARK STREET RADIO	DSP	Signed Heads of Terms
Eirewave Ltd EIREWAVE	DSP	Signed Heads of Terms
Flex FM Radio Ltd FLEX FM RADIO	DSP	Signed Heads of Terms
Children's Radio UK Ltd FUN KIDS	DSP	EOI - Email
Happy Radio UK Ltd HAPPY RADIO	DSP	Signed Heads of Terms
Pearce Media Group JUICEUK	DSP	Signed Heads of Terms
Life Radio UK LIFE RADIO UK	DSP	Signed EOI
London Music Radio Ltd LONDON MUSIC RADIO	DSP	Signed Heads of Terms
London Turkish Radio LONDON TURKISH RADIO	DSP	Signed EOI
Credible Media Ltd MMH – HOME OF ROCK RADIO	DSP	Signed Heads of Terms

Credible Media Ltd MOM'S SPAGHETTI RADIO	DSP	Signed Heads of Terms
MZ Radio London MZ RADIO LONDON	DSP	Signed EOI
Thames Radio Ltd NATION EASY RADIO	DSP	Signed Heads of Terms
Thames Radio Ltd NATION 80s	DSP	Signed Heads of Terms
Thames Radio Ltd NATION 90s	DSP	Signed Heads of Terms
Nomads Media CIC NOMAD RADIO	DSP	Signed Heads of Terms
Digris Ltd OPEN BROADCAST RADIO	DSP	Signed Heads of Terms
Platinum Radio London PLATINUM RADIO	DSP	Signed EOI
Order My Steps RUACH RADIO	DSP	Signed Heads of Terms
1MM Media Ltd SAMI SWOI RADIO	DSP	Signed Heads of Terms
Sunshine Daze Media Group Ltd SHINE 879	DSP	Signed Heads of Terms
Bradford City Radio Ltd SUNRISE RADIO	DSP	Signed Heads of Terms
Spice Entertainment Ltd SUNRISE RADIO GOLD	DSP	Signed Heads of Terms
Like Broadcasting North Limited TOMORROWLAND OWR	DSP	Signed Heads of Terms
UGN MEDIA UGNJAMZ	DSP	Signed Heads of Terms
Al Shirkatul Islamiyyah VOICE OF ISLAM	DSP	Signed Heads of Terms

5. Fair and effective competition

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

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

Industry-wide editorial and advertising, a strong website presence and a pro-active and open approach towards potential service providers has led to direct contact with 154 radio stations.

86% of these stations are London based.

During the licence period, we would establish a robust, framework that will seek to ensure our processes are accountable and conducive with a fair and effective approach to competition.

Measures taken prior to Ofcom's advertisement announcement

Our starting point was to make direct contact with the heritage licenced analogue community radio services in the advertised area to explain our proposals, invite their participation as stakeholders in North London Digital and to offer to contract with these programme service providers. Maritime Radio, and Revive FM were each approached along with the five licenced local community radio services broadcasting on the trial multiplex – Nu Sound Radio, Resonance FM, Rinse FM and The Beat and Desi Radio. We made contact by email and/or phone and in the case of Resonance, Rinse, Revive FM, Nu Sound and The Beat, we went out of our way to summarise Ofcom's emphasised words of encouragement that there is no restriction on service providers expressing interest in any number of North London radio multiplex applicant groups as a way to offer a degree of carriage certainty.

Also prior to Ofcom's advertisement announcement, we created our website which sets our intentions to apply for this licence and takes the reader through the key stages of small-scale DAB licensing and invites interested parties to make contact. Our site may be viewed here: www.northlondondab.com

Approaching a wide range of potential service providers, following Ofcom's advertisement announcement

The day following Ofcom's licencing Round 5 announcement, we placed an advertisement on the Radio Today website and also received editorial coverage. The three ads were our call to action.

Our advertising campaign was shared with applicants for two neighbouring radio multiplex advertisement areas (South London and West London). These advertisements took the reader to a London page, hosted by a neutral entity Opendab CIC. Shown below are the three 'animated' advertisements, from where service providers and interested parties could choose the area of London they wished to serve.

This campaign was the only one of its kind to run each week of Ofcom's 12-week licence application window.

RadioToday World Europe Ireland NI Scotland UK US Wales // RadioToday Jobs //

RadioToday
SPONSORED BY **RCS**

TRUE INTEGRATION
Zetta Automation GSelector Music Scheduling Aquira Traffic Revma Streaming RCSCloud Peace of Mind RCS2GO Mobile

HOME ALL NEWS INDUSTRY STATIONS PEOPLE CATEGORIES EVENTS JOBS MORE

LONDON'S CALLING!

SSDAB Multiplexes Serving the Capital

7.2 million Londoners are waiting to hear your radio station

DAB Digital Radio opportunities in LONDON

Proposed North, South & West London DAB digital radio transmission areas will reach up to 7 million unique listeners from next year.

To find out more about reaching the London DAB radio audience, please choose from your area(s) of interest below.

Ofcom, in their notes of guidance, emphasise that community and commercial radio stations are not restricted in expressing interest in having their service carried by any number of radio multiplex applicants - as this may provide a degree of 'carriage' certainty, irrespective of the successful bid.

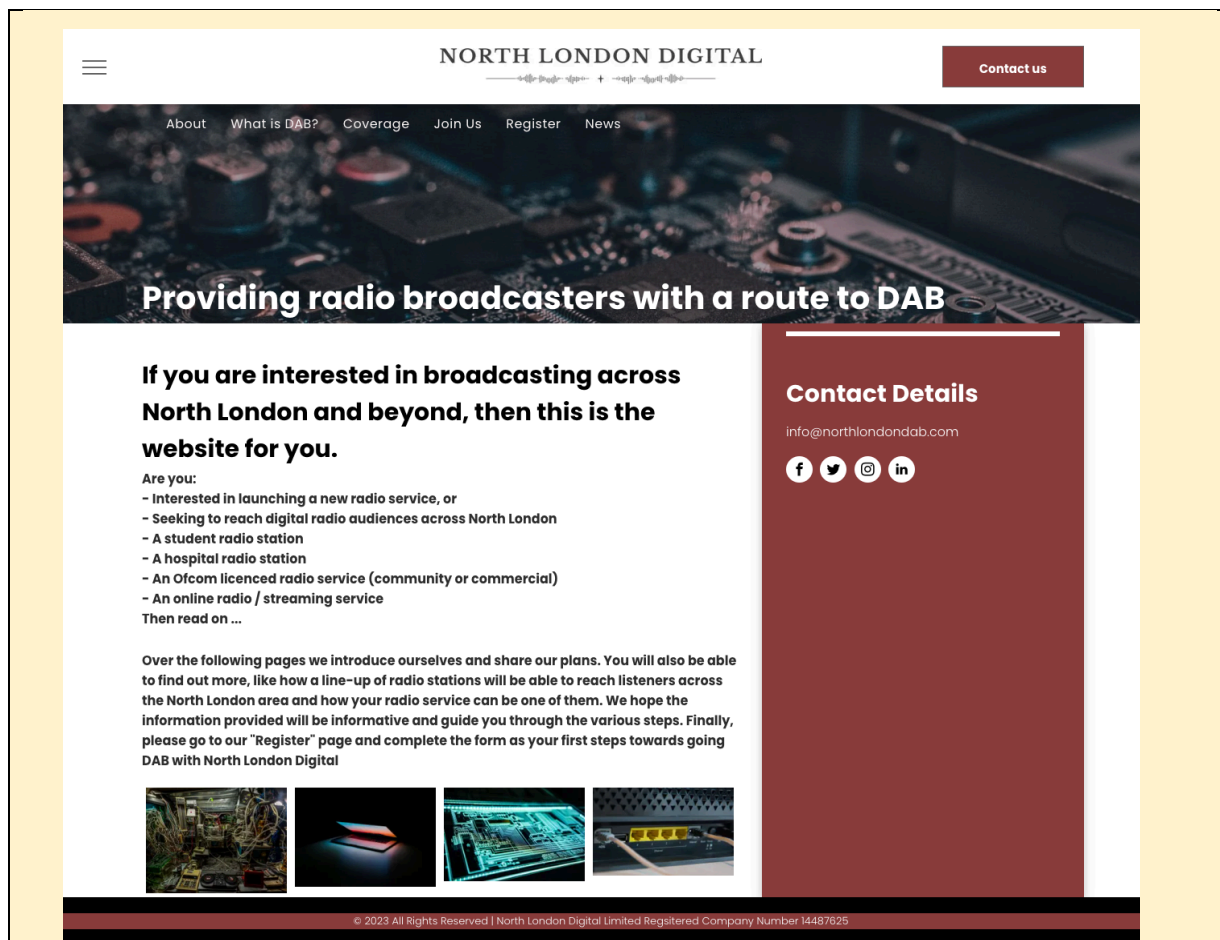
NORTH LONDON - 3.6 MILLION ADULTS

SOUTH LONDON - 2.8 MILLION ADULTS

WEST LONDON - 2.2 MILLION ADULTS

Clicking on the North London button took visitors to the North London Digital Website (please see sample page overleaf).

The North London Digital website received 1,140 views.



Trial service DSPs

This licence application is in response to Ofcom’s radio multiplex advertisement for an area largely but not completely aligned with an area served by the London temporary trial SSDAB service. We took account of the 25 DSP services being carried at the time. To ensure we acted in a manner of competitive fairness as well as in a manner calculated to cause minimal disruption to listeners, we wrote to and emailed an open letter on April 3rd. We stressed, echoing Ofcom’s words, that to provide a measure of carriage certainty, service providers were not restricted in supporting more than one licence applicant. This we felt was important because with the any radio multiplex service being required to reserve 324 capacity units for C-DSP licensees, it was inevitable that some DSP services would become displaced.

Of the five heritage analogue community radio services being carried on the trial multiplex, The Beat after expressing interest, became participants in our company. Desi Radio advised us that they were aligned with the City West Digital application in West London. Nu Sound, initially responded positively, but told us that they were subsequently advised by U.DAB not to have contact with the North London Digital team. From Resonance and Rinse the remaining two community radio services, we did not receive responses of any kind.

In the event of being awarded this radio multiplex licence, and with listeners in mind and in the interests of continuity of service provision, we would again make contact with these service providers, particularly those holding an Ofcom analogue community radio licence, with a view, subject to available multiplex capacity, to negotiate and agree satisfactory terms.

Two services being carried on the trial Desi Radio and Riverside Radio both explained their preference to cease broadcasting on the trial and take carriage on the West London and South London multiplexes respectively.

The Beat welcomed the approaches being made by North London Digital and committed to being involved in our project. They subsequently agreed to be a participant in the company taking a 15% stake.

Other radio services

The second phase in our approach was to identify and contact former licenced radio broadcasters such as Betar Bangla and Potters Bar Radio and additionally, online radio services such a GreekBeat.

Betar Bangla was forced to cease transmissions after site rental costs saw a steep increase and the development of Crossrail meant that Network Rail made their AM site inaccessible on Health and Safety grounds, resulting in the radio service being unable to broadcast and having to hand back their licence. Betar Bangla has joined North London Digital as a participant while Potters Bar Radio told us that they were not interested in DAB broadcasting and declined to get involved.

GreekBeat made initial contact with North London Digital as a direct result of our awareness campaign. They expressed interest in the project and then, as our working relationship grew, agreed to sign-up as a fully-fledged participant taking a stakeholding of 10% in the company.

Our outreach extended to a total of 154 active radio services including Nomad Radio, a licenced analogue community radio service, on the fringe of the advertised area. In addition, we made contact with LGR (London Greek Radio), Delite, Jeo Radio (now Sunrise Smooth) and Panjab Radio. From this total of contacts, North London Digital has signed provisional terms with eight C-DSP services, four of which are C-DSP participants in the company. In addition, 32 service providers have signed Heads of Terms with us and a further five have signed expressions of interest.

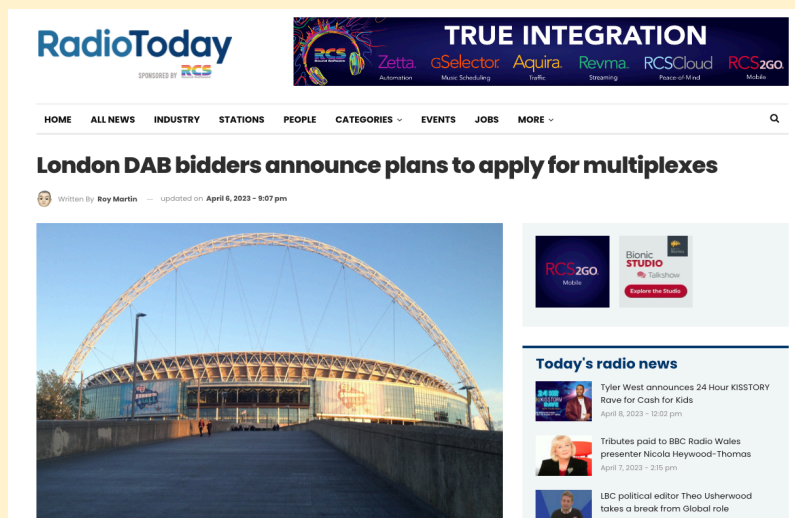
By the third week following Ofcom's SSDAB licencing advertisement, North London Digital had reached almost full capacity with expressions of interests (EOIs) and heads of terms (HOTs).

Campaign analysis

We combined our desk analysis, direct marketing approach with advertising on the radio industry's primary news and information website Radio Today. Radio Today is read by community, commercial, BBC and independent broadcasters, support services and allied trades. Our advertisement feature gave us prominence during a defining moment. Please see below.

These advertisements were supported by the editorial piece written up by Radio Today to champion Ofcom's licencing Round 5 announcement. Alongside a quote by the North London trial

multiplex operator, North London Digital was the only other North London applicant to be featured. In this editorial we took the initiative to extend our invitation to radio services to become participants and/or carriage customers. By getting it published as early as 6th April, it allowed plenty of time for radio services, interested in finding out more, to get in touch.



North London Digital Limited

North London Digital includes Infocus Digital Media Limited, the operators of multiplexes in Leeds and Bradford, and community radio stations in North London.

Raj Parmar, director at North London Digital said: "Our door is always open to community radio services who wish to be stakeholders and join us on our digital journey".

Community radio services and stations can visit northlondondab.com or email info@northlondondab.com for more details.

Measures taken in our dealings with prospective 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 Terms 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 modestly discounted charges for locally-based DSPs, or the full standard indicative rate for non-qualifying DSP services.

Measures we will take during the licence period

In an arena where demand will outstrip supply, we create an environment that is conducive to fair and effective competition among radio service providers.

- Our multicultural board of directors is well placed to reflect the wide spectrum of tastes and interests North London's consumers are likely to expect
- North London Digital will contract directly with carriage customers and will not entrust our duties to a third party
- Our framework outlined below will make our process accountable
- Our website will showcase our finalised carriage charges and the process for 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 process will be a three-stage process. Our thresholds include aspects such as localness, extent of appeal and robustness of the service provider's proposal. Applicants will be encouraged to make their case in the submission of their expressions of interest. Our process includes sifting, reviewing and placement of applications on a waiting list. Upon conclusion, uniform carriage agreements with shared common Terms and Conditions, will be issued to service providers.

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

Making certain our activities are conducive with a competitively fair and effective approach

We recognise that there is a step-change between formulating a Fair and Effective policy and implementing one. Here, we will draw on the experience of Will Jackson who undertook this responsibility as part of his remit as radio multiplex account manager at Arqiva. With each member of our OMG contributing, we will aim to ensure we are best placed to make robust and fair decisions with regard to the services we select.

Section 316 of the Communications Act and Part 2(11) of the Small-scale Radio Multiplex Licence, is specific and places certain duties on the licensee.

A fundamental factor in making certain the measures we adopt which ensure our activities are conducive with a fair and effective competitive approach, is that we should maintain control over all carriage capacity sold.

Our fear is that if the marketing function of carriage capacity becomes allocated or entrusted to a third party, with possibly a different modus operandi, the effectiveness of our measures would become diluted.

In such a case, we recognise that our accountability would be marginalised to the extent that as a company we could easily fall short from creating an environment that is conducive to fair and effective competition among service providers.

Subject to interpretation, this could in turn lead to North London Digital being found in breach of its Licence Conditions through the actions a third party.

However, by maintaining complete control over all carriage capacity sold and with all decisions being made from within our strong multicultural group, we believe we will be best placed to determine the services we carry.

Conclusion/summary

In summary, North London Digital has canvassed extensively and sought to engage with many potential radio service providers. Our transparency and standardised terms remain central to our trading activities. In the event of North London Digital being awarded the North London radio multiplex licence, we can be seen to have developed a rigorous framework with defined areas of activity. This framework relates to all capacity sold and not just a portion of it, and when taken as a whole, can be seen to have been constructed in a manner calculated to ensure fair and effective competition in the selection and engagement of all programme services applying for carriage on the North London Digital small-scale radio multiplex.

NORTH LONDON DIGITAL



Application in numbers

Adult population coverage	95%	within advertised area
Overlap with local radio multiplex service	39.7%	below the LRMS 40% limit
Overspill outside the advertised area	15.1%	of advertised area
Business plan launch expenditure	£130,000	to establish the service
Technical plan with	6	sites
Digris technical partner/stakeholder	11 years experience	DAB specialist
Average cost per transmitter	£7,800	per site
Total install average cost	£21,600	per site
Timetable - operationally live	12	months
Operational Management Group	5 members	with 160 years community and/or commercial radio sector experience
Community radio participants	4	
Community Radio	40%	‘voice’ in the Boardroom
C-DSP participants voting power	45%	in the applicant company
Demand or support	8	total number of C-DSPs
Demand or support	37	established DSP radio services
Contract or offer to contract with	154	potential radio service providers

6. Declaration

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

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

RAJAN PARMAR

Date of application:

28 JUNE 2023

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

Company director