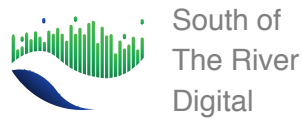


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## Small-scale radio multiplex licence

Application form – Part A (public)



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

**SOUTH OF THE RIVER DIGITAL RADIO**

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

**SOUTH LONDON**

# 1. Overview



South of  
The River  
Digital



## Coverage of the area to be reached and how it will be achieved

- **Predicted coverage extends to 93% of the advertised area population**
- **A five-site network manages Local Radio Multiplex Services (LRMS) overlap to 32% and limits overspill to less than 25% of adults**
- **A technical plan that is adaptable so that in the event of co-block frequency allocation or other interference management requirements, it can be modified**



## Know-how, resource and a plan to establish the proposed service

- **Understanding business, the market and the communities we serve, our finance, business and technical plans will be the vehicles for delivery of a fully operational radio multiplex**
- **Award to launch in 12 months**
- **A stake-holding technical partner with pedigree, will design, install, monitor and maintain a fully compliant, resilient, network**
- **Our Senior Management Team of radio professionals is structured to be agile and by using a pooled knowledge base will achieve its delivery targets within timescales and budgets**



## Participants proposing to provide community digital sound programme services

- **14 community radio services have undertaken to apply for C-DSP licences**
- **8 of these services are participants with a total of 54% voting power**



## Evidence amongst service providers that they want their services carried across South London on the radio multiplex service

- **42 radio services have indicated that they wish to seek carriage on South of the River Digital**
- **28 DSP services have signed documentation to take carriage**



## Ensuring fair and effective competition among service providers when offering to contract

- **Industry-wide editorial, advertising and direct marketing, bolstered by our long-established website has enabled South of the River Digital to reach all manner of radio services**
- **156 services were contacted directly**
- **Transparent pricing and common carriage 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 purely on 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 technical plan that:**

**serves the five segments across a 40km wide advertised area**

**reaches 93% of the target population**

**takes account of practical issues arising from the outcome of Round 5 licensing**

### Coverage overview

South of the River Digital proposes to serve an area defined broadly by the River Thames from Richmond in the West to Greenwich in the East. The perimeter of the polygon line also extends out west to Walton on Thames and east beyond Sidcup. South of the River Digital proposes to deliver a robust signal into these localities and all places in between. Planned coverage into the southern segment of the advertised area is characterised by our delivery of a serviceable signal into Chessington, Banstead/Purley/Croydon and Orpington.

The terrain is a key influence upon this advertised area. The area mostly beyond the southern polygon line running east to west is framed by the North Downs. South of the River Digital has made use of much of this natural barrier to deliver protection to neighbouring licence areas and thereby seeks to deliver spectral efficiency.

The largest natural feature in the centre of the polygon is sometimes known as the Crystal Palace Hills. This area of elevation is 'Y' shape in nature extending from Thornton Heath north-easterly to Brockley and from Beulah Hill north-westerly to Streatham Hill. Flanked either side of the Crystal Palace Hills are the elevated areas of Richmond Park and Wimbledon Common in the west and Shooters Hill and Chislehurst Common in the east.

The area nearest the River Thames accommodates some of the lowest ground in the advertised area.

From this the advertised area may be divided into five segments – Wandle Valley, Central South, Lambeth area, Bromley & Beckenham and Orpington.

### Planned robust coverage across the polygon

We have modelled different propagation options and our predicted coverage suggests we have been able to limit 'not spots', delivering contiguous coverage to most populated parts of the advertised area. Deciding to opt for a multi-site network means that we can deliver

comparatively high levels of field strength into a number of different localities across the advertised area. This approach also means that we can reach the many areas that are shielded by natural features, areas which often tend to receive low level signals. Working within a sub-band II digital broadcast system we believe our multi-site approach mitigates many of the potential coverage issues that may arise from a single site. This is assuming if bearing the high rental cost (circa £31,000) of a single site was a realistic option.

Our technical plan has been devised with the knowledge that to keep our carriage price point low, in order to make carriage more accessible to a wider range of would-be DAB radio operators, we need to keep down operational costs. Our multi-site approach enables us to achieve that.

#### Description of the network

We propose a multi-site network of five transmitter locations. Each antenna system is directional in order to direct the receivable signal into areas where the population density is the highest while ensuring overspill is kept to a minimum. This way we have planned our coverage in a manner that is spectrally efficient.

Our estimates indicate that many thousands of listeners can expect to be served by more than one transmitter in our 5 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 Diggris, 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.

#### Our primary site

Our primary site, Croydon Town, reaches in the order of 45% of the population within the advertised area.

As the primary server, we have considered how we could improve resilience at this site and for the network as a whole (see also our approach to network resilience in Annex 5 Network diagram). Although there is little increment to capital expenditure, we are able to engineer this site for High Availability. This would be achieved by incorporation of hot and cold standby components in various elements of the distribution and transmission chains. This site will also act as a 'jump point' to provide a second layer of resilience to the remaining sites which are within range of a Fixed Wireless Access link using OSPF (Open Short Path First) provided by a pair of cross-connected HA routers located at the primary site. The diverse connectivity paths, radio link equipment and routers at this site would provide a minimum 12 hours of battery backup to allow ample time to enact any necessary remedial response.

## Extent of our predicted coverage

The table below summarises the extent of our predicted coverage:

<b>South London</b>	<b>Adults 15+</b>	<b>Percentage</b>
Advertised area population:	2,799,064	100.0%
Predicted coverage inside polygon:	2,615,688	93.4%
Predicted coverage outside polygon:	646,583	23.1% ± 1.6%
Local DAB service 1. LRMS: London:	10,102,817	100.0%
Predicted pop. coverage inside LRMS:	3,217,025	31.8%

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

At 63dB $\mu$ V/m, beyond the advertised area's polygon line, our signal has been carefully engineered to minimise serving audiences in neighbouring polygons. The extent of such overlap has been kept below 25% of the permitted 30% coverage overlap total.

At 38dB we see very minor pockets of signal on high ground around Goring (Berkshire north & south Oxfordshire polygon) but not in populated areas and two islands on high ground circa 5km from the outskirts of Basingstoke (Hannington and Ellisfield). Again, these are sparsely populated areas. The e.r.p. of the Basingstoke service of 250W (directional from near Ellisfield) is noted and this is expected to deliver a > 25dB differential between field strengths into these areas. Taking account of these anomalies we are confident that our signals will comply.

## Sussex and Oxfordshire – 10B

The detailed transmission network and hole-punching assessments submitted by South of the River 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 South of the River Digital proposal for the South 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 a result of 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 to one of our selected sites, we have used height to ameliorate potential impact.

Additionally, Digiris, 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.

### Site options

We explore in 2.2 below the practical issues dependant upon Ofcom's award of the North London advertised area and the applicant's technical plan which is unknown to South of the River Digital, at this time. To ensure that potential disruption surrounding installation is minimised we propose a second option of near-equal merit in terms of the overall extent of coverage.

### Conclusion/summary

Our predicted coverage reaches 2,615,688 adults (93.4%) inside the South London polygon. Overspill has been constrained to less than 25%.

The plan affords some flexibility in case of any ACI mitigation or further restrictions which might be required by Ofcom due to clearance or spectrum efficiencies. It is not expected that any such requirements would impact greatly upon the viability of the proposition of South of the River Digital or the usefulness to the community radio stations that are participants in the applicant group.

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

Two options are presented, one based on transmitting from Shooters Hill the other from Honor Oak. The difference in terms of total population covered, both inside the advertised area and outside the advertised area, we would suggest is not material. Please see table below:

**South of the River Digital total area coverage with Honor Oak and Shooters Hill comparative population difference**

Site	Inside advertised area	Outside advertised area
Honor Oak	93.4%	21.5%
Shooters Hill	92.9%	24.7%
Difference	0.5%	3.2%

We present both options as part of our application in recognition of certain practical considerations arising. These are explored in **Annex 4 (page 5)**.

Summary details of sites:

**Incorporating Shooters Hill**

Site name	NGR	Antenna height (m agl)	Antenna type proposed with bearing	New or existing antenna	ERP (W)
Kingston	TQ197703	28m	2 tiers, dipole 290 degrees ETN	New	180W
Southfields	TQ240736	50m	2 tiers, cardioid 300 degrees ETN	New	100W
Shooters Hill	TQ438767	29m	2 tiers, Log Periodic 240 degrees ETN	New	380W
Orpington	TQ 498651	16m	2 tiers, cardioid 280 degrees ETN	New	250W
Croydon Town	TQ 329656	140m	3 tiers, dipole 300 degrees ETN	New	140W

### Incorporating Honor Oak

Site name	NGR	Antenna height (m agl)	Antenna type proposed with bearing	New or existing antenna	ERP (W)
Kingston	TQ197703	28m	2 tiers, dipole 290 degrees ETN	New	180W
Southfields	TQ240736	50m	2 tiers, cardioid 300 degrees ETN	New	100W
Honor Oak	TQ352738	31m	2 stacked dipoles 20 degrees ETN	New	50W
Orpington	TQ 498651	16m	2 tiers, cardioid 280 degrees ETN	New	250W
Croydon Town	TQ 329656	140m	2 tiers, dipole 300 degrees ETN	New	110W

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 (shown in both tables above) offers, to some degree, this necessary protection.

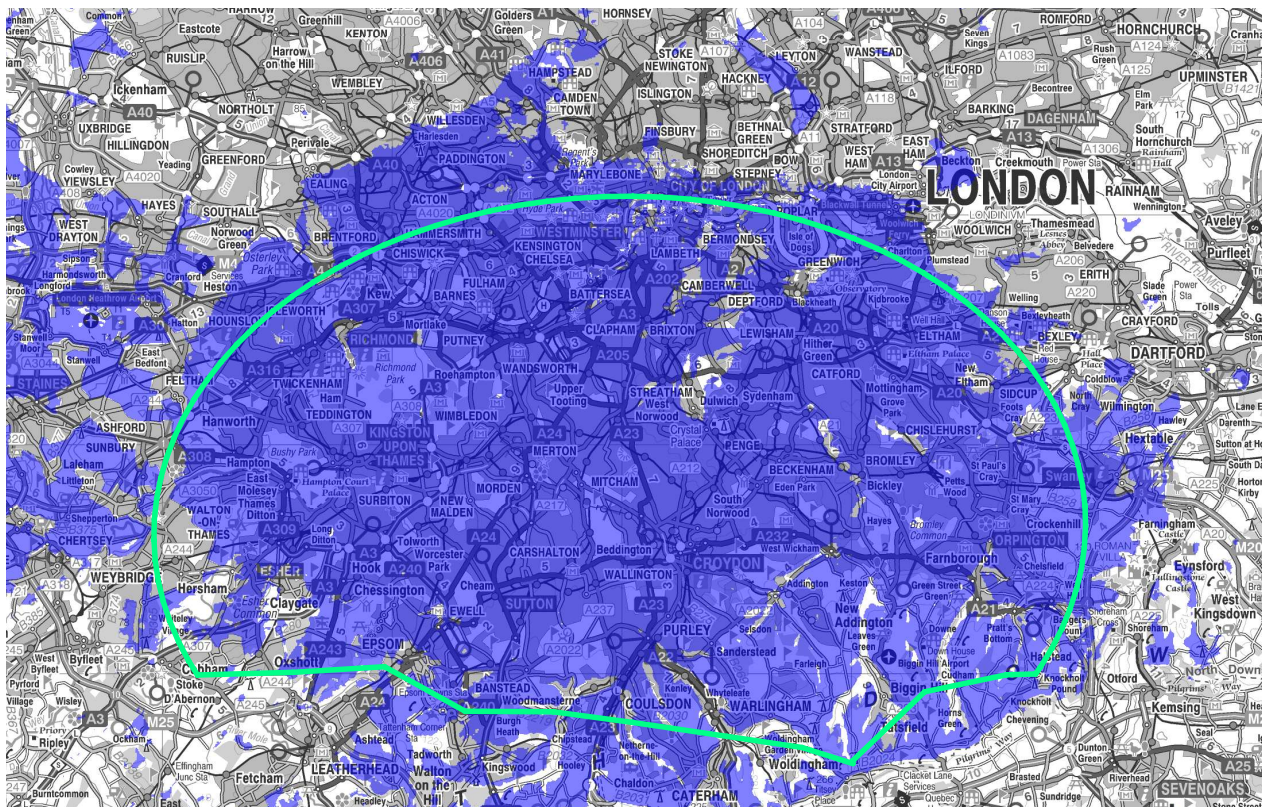
We explain why we have presented this information in a somewhat unconventional manner in **Annex 4 Page 5**.

South of the River Digital is content to work with either option, but as we set out in the Annex, there are reasons beyond our control as to why selection of the Honor Oak site might prove to be impractical.

Assessing Ofcom's recent approach to sites and site availability, we have introduced an alternative which could easily be adopted, with minimal overall impact, and thereby demonstrates, we trust, that our company will be ready to act in any eventuality.

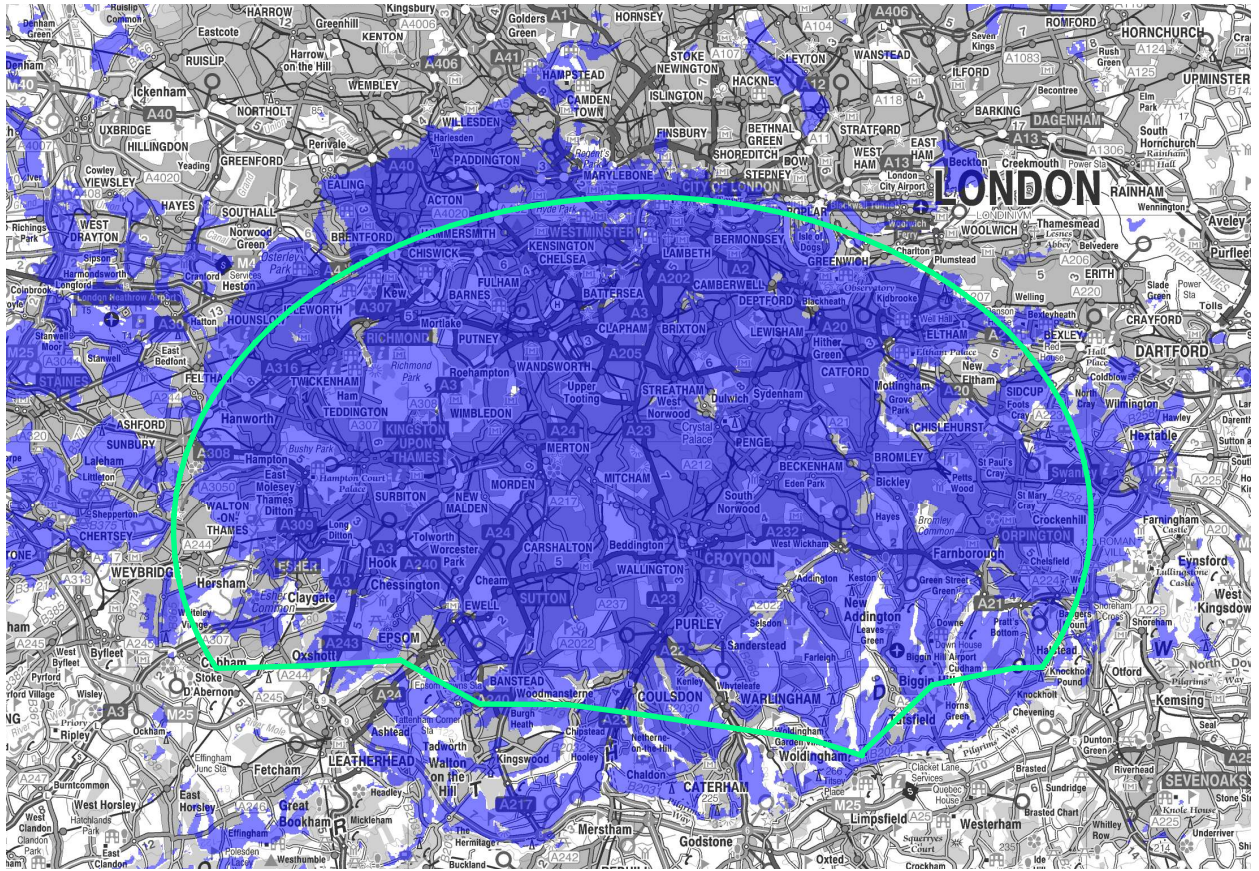


2.3 Please provide below a coverage prediction map for the whole transmitter network you are proposing to build within 18 months if you are awarded a licence. The map should show the 63 dB $\mu$ V/m field strength and the advertised small-scale DAB licence area contour. [Small-scale DAB licence areas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



digris





digris

63dB $\mu$ V/m

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

Provide the name and version of the prediction tool used.	HTZ Communications Version 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?	Olivier Boudot Digris FR

## 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):

South of the River Digital Radio Ltd

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

14487675

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:

105 Birkbeck Road, Beckenham BR3 4SR

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 <sup>1</sup>	Country of residence	Other officerships held (and nature of the business concerned)	Other employment
Carl Shepherd	105 Birkbeck Road, Beckenham B3 4SR	UK	<u>Director:</u> Flex FM Radio Ltd  <u>Director:</u> Hyrrr Films Ltd  <u>Director:</u> Hyrrr UK Ltd  <u>Director:</u> Front Fans United Ltd	

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

			<p><u>Director:</u> Flex Media Ltd</p> <p><u>Director:</u> Run Rally Ltd</p> <p><u>Director:</u> Flex Recordings Ltd</p> <p><u>Director:</u> Lit Bar Ltd</p> <p><u>Director:</u> Arch 634 Ltd</p> <p><u>Director:</u> Flexible Artist Management Ltd</p> <p><u>Director:</u> FLX Media Ltd</p>	
Chris Chikwendu Ubosi	105 Birkbeck Road, Beckenham B3 4SR	UK	<p><u>Director:</u> Bang Media and Entertainment Ltd <i>Radio Broadcaster</i></p>	
Lawrence Galkoff	105 Birkbeck Road, Beckenham B3 4SR	UK	<p><u>Director:</u> Lawrence Galkoff Associates <i>TV programme production</i></p> <p><u>Director:</u> Manchester DAB CIC <i>Radio Broadcasting</i></p> <p><u>Director:</u> City West Digital CIC <i>Dormant applicant company</i></p> <p><u>Director:</u> 103-105 Birkbeck Road Management Ltd <i>Residents property management</i></p> <p><u>Trustee:</u> Prison Radio Association <i>Educational support services</i></p> <p><u>Director:</u></p>	

			Reasons 2B Cheerful Ltd <i>dormant</i>	
John Edward Ryan	105 Birkbeck Road, Beckenham B3 4SR	UK	<u>Director:</u> Gaydio Community Interest Company <i>Radio Broadcasting</i>  <u>Director:</u> 2ZY LTD <i>Radio Broadcasting</i>	Radio Broadcaster
Thomas Gilgen	105 Birkbeck Road, Beckenham B3 4SR	UK	<u>Director:</u> Digris Ltd  <i>DAB Transmission</i>	<u>Director, CEO</u> Digris AG, Switzerland
Usha Parmar	105 Birkbeck Road, Beckenham B3 4SR	UK	<u>Director:</u> Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire) <i>Radio Broadcasting</i>  <u>Director:</u> Spice Entertainment Ltd <i>Radio Broadcasting &amp; Hospitality</i>  <u>Director:</u> Infocus Digital Media Ltd <i>Radio Broadcasting</i>  <u>Director:</u> Bradford Digital Media Ltd <i>Radio Broadcasting</i>  <u>Director:</u> Leeds Digital Media Ltd <i>Radio Broadcasting</i>  <u>Director:</u> East Manchester DAB Ltd <i>Radio Broadcasting</i>  <u>Director:</u> MK Digital Media Ltd <i>Radio Broadcasting</i>  <u>Director:</u> BBD Digital Ltd <i>Radio Broadcasting</i>	<u>Executive Director</u>  Bradford City Radio Ltd T/A Sunrise Radio (Yorkshire)

			<p><u>Director:</u> City West Digital CIC <i>Dormant applicant company</i></p> <p><u>Director:</u> Derby DAB Ltd <i>Dormant applicant company</i></p> <p><u>Trustee:</u> Rishi's Vision <i>Charity</i></p> <p><u>Trustee:</u> Jai Maa Bhameshwari Kali Mandir <i>Charity</i></p>	
Daniel Nathan	105 Birkbeck Road, Beckenham B3 4SR	UK	<p><u>Director:</u> Brighton &amp; Hove Radio Ltd; Festival Online; Festival Productions; OpenDAB Brighton &amp; Hove CIC; Platform B; Hastings Digital Radio CIC; East Sussex Digital Radio Ltd; Digital Radio East Sussex; Brighton &amp; Hove Digital Radio CIC; <i>Radio broadcasting</i></p> <p><u>Director:</u> Old Court House Residents Ltd; Parochial Mews &amp; Flats Courtyard Ltd <i>Residents property management</i></p> <p><u>Director:</u> Same Sky Ltd <i>Arts facilities</i></p> <p><u>Director:</u> Valley Gardens Forum CIC <i>Professional membership activities</i></p> <p><u>Director:</u></p>	

			Hopshire Investments <i>Real estate lettings</i> <u>Director:</u> Langham Trading Ltd <i>Textile agents</i>	
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## Details of participants

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

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

Full name of participant (existing and proposed)	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Flex FM Radio Ltd	15	£15.00	15%	15%
Riverside Broadcasting CIC	5	£5.00	5%	5%
Nomads Media CIC	1	£1.00	1%	1%
Gaydio Community Interest Company	15	£15.00	15%	15%
Bang Media and Entertainment Ltd	15	£15.00	15%	15%
Order My Steps Ltd	1	£1.00	1%	1%
Croydon Central Radio - CCR Radio Ltd	1	£1.00	1%	1%
The Greek Voice of London CIC	1	£1.00	1%	1%
Will Jackson	1	£1.00	1%	1%
Digris Ltd	15	£15.00	15%	15%
Infocus Digital Media Ltd	15	£15.00	15%	15%
Festival Productions Ltd	5	£5.00	5%	5%
Lawrence Galkoff Associates	5	£5.00	5%	5%
Paul Boon	5	£5.00	5%	5%
<p><b>Comments</b></p> <p>The ownership profile of South of the River Digital rests on five organisations each holding 15% of the company (75% in total). Of these five, three are Ofcom heritage community radio licensees.</p>				



While four community radio operators were not in a position to make a substantial financial commitment to this project, they were content to show their support in a tangible way. To this end, Nomad, Ruach, Greek Voice and Croydon Central Radio are each subscribers in the company taking 1% each.

54% of the shares held in South of the River Digital are held by community radio participants who each intend to apply for a C-DSP licence.

Over half of the Board of directors represent community radio interests.

Separately, 69% of participation ownership, is shared among people who live, work or have lived and 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		

## Details of persons who control the applicant

- 3.8 Complete the table overleaf, expanding it if necessary, *to list all persons/bodies corporate who control the applicant*, or control any person/body corporate with control over the applicant. Please include persons or bodies that control the applicant (or body corporate with control over the applicant) jointly i.e. acting together in concert with third parties (e.g. because of a shareholder’s agreement). Please note that some of this information may repeat information provided above on shareholders and other participants in the applicant:

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

Full name of person/body corporate	Address	Person/body controlled by the entity (i.e. the applicant itself or its associate)
N/A		

3.9 Complete the following table, expanding it if necessary, to list other bodies in which any individual listed in response to question 3.8 is a director or designated member:

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

Full name of individual	Name of body in which individual is a director or designated member
N/A	

3.10 Complete the following table, expanding it if necessary, to list all bodies corporate which are controlled (including jointly controlled) by any body corporate listed in response to question 3.8:

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

Full name of body corporate listed in 3.8	Body corporate controlled
N/A	

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

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

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

## Involvement of the applicant in specified activities

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

Activity/involvement	Yes or No	Please state who is involved; the name of the body/individual/agency they are involved with; and the extent of their involvement
A local authority	No	N/A
A body whose objects are wholly or mainly of a political nature, or which is affiliated to such a body	No	N/A
A body whose objects are wholly or mainly of a religious nature; <sup>2</sup>	Yes	Usha Parmar is a Trustee of Rishi's Vision (Charity) and a Trustee of Jai Maa Bhameshwari Kali Mandir (Charity)
An individual who is an officer of a body falling within (b) or (c);	No	N/A
A body corporate which is an associate (as defined in paragraphs 1(1) and 1(1A) of Part I of Schedule 2 to the Broadcasting Act 1990) of a body falling within (b) or (c);	No	N/A
An advertising agency or an associate of an advertising agency.	No	N/A

## Details of applications, licences and sanctions

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

a) Is the applicant a current licensee of Ofcom?

**No**

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

**No**

<sup>2</sup> 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.

- 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:

3.15

	<b>Licence number(s) (if known)</b>	<b>Details</b>
(a)	N/A	
(b)	N/A	
(c)	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
	DP104612BA/1	Spice Entertainment – Sunrise Radio Gold (Bradford SSDAB Multiplex) – 2022 to date
	DP104612BA/1	Spice Entertainment – Sunrise Radio Gold (Leeds SSDAB Multiplex) – 2022 to date
		Spice Entertainment – Sunrise Radio Gold
	CR000068BA/4	The Beat London 103.6 (also Bang Radio)
	CR101737BA/1	Flex FM on air since June 2018
	CR101743BA/1	Nomad Radio on air since October 2019
	CR000186BA/2	Gaydio - Manchester
	CR101283BA/1	Gaydio – Brighton
	DSP000067	Gaydio (London, Manchester, Brighton)
	Licence number not known	Gaydio Manchester 3 x RSLs (2006-2007)
	DS103911	Leeds Digital Media
	DS103920	Bradford Digital Media
	DS104327	Manchester DAB
	CR000061BA/2	Desi Radio
	CR000197BA/3	Radio LaB 97.1 (University of Bedfordshire)
	RSLs (various)	Brent Cross: BXFM (2004-2007);
	Licence numbers not known	Bromley: Smile Radio (2009)
		Centre FM: Watford and Gateshead
	RLCS000072BA/2	National Prison Radio
	CR101275BA/1	Platform B
	SSDAB WT012	Brighton Trial DAB
(d)	N/A	
(e)	N/A	
(f)	N/A	

(g)	N/A	
(h)	N/A	
(i)	N/A	

3.16 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.

N/A

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

**No**

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

## Financial and business plan

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

**With our expenditure plan fully budgeted and funding agreed and committed to by each lender, South of the River Digital has the confidence, resource and experience to establish this multiplex service.**

The costs required to establish this multiplex service have been framed within a business plan that takes account of a number of linked elements. These are:

- the competitive multiplex market in which we will operate;
- the price-point at which we will sell capacity;
- the characteristics of the population who will receive our radio service;
- the environment;
- the issue of pan-London service coverage requests and
- the integration of our technical plan into the business plan.

Each of the above determines the scale of our operation, the service we can deliver and the cost of delivering it. Our approach to each of these elements is set out below.

### A South London Radio Multiplex in a competitive multiplex market

We are acutely aware that the South London advertised area is one of five overlapping areas within the M25, with South London having the second highest potential population coverage. While we have in mind an indicative carriage cost, we are aware that three London-wide radio multiplexes are already present across the wider region. In addition, the Surrey multiplex places a serviceable signal into more than two-thirds of the South London advertised area. From this we anticipate significant market disruption once these operators provide a DAB+ option. Any resulting increase in availability in service provider capacity, will have the effect of driving down carriage charges. This can be expected to impact upon the carriage prices charged by small-scale DAB multiplex services operating within the M25. Our business plan prepares us for this eventuality.

The price-point at which we sell capacity

While in terms of scale, the South London licenced area's population will be larger than many Local Radio Multiplex Services (LMRS) in other parts of the UK, we place as a priority, a heavily subsidised rate of charge to community radio services, able to qualify for C-DSP reserved capacity. Our C-DSP charges are discounted by more than half the cost of our DSP carriage charges at the same bit-rate.

Our DSP carriage rates, when compared with typical LRMS charges will themselves be substantially lower. Indeed, when compared as a cost per capita with small-scale DAB services in Edinburgh, Glasgow, Cardiff and Leeds, our carriage costs work out to be about one-third. As part of this application process, our proposed charges have been shared with our potential service providers. They equate to an annual Cost Per Thousand of £2.59.

Characteristics for the advertised area population

We considered the make-up of adult Londoners, 2.8 million of whom live in the advertised area. Today 41% of all 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. The largest share of population is among those of working age, aged 20-64 (64%) with Londoners aged in their 20s to 30s representing the peak. Radio listening remains resilient in the Capital, while the take up of DAB listening continues to increase from a 30% share in 2015 to a 43% share last year. South of the River Digital places an importance on these figures and other statistics gathered because it is within this framework that our business plan will be expected to operate. Our Board too is diverse and so the decisions we take will be better informed and more likely to reflect the South London population we serve.

The environment

South of the River Digital's business plan accommodates the Government's Net Zero target. Although when compared to larger TV and radio operators our total energy consumption is very low indeed, we still believe we have a duty, even as a new entrant, to ensure our energy consumption is 100% offset. The costs of being carbon neutral have been incorporated into our business plan.

Pan-London coverage requests

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 small-scale DAB 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 the offering from these mux operators was more competitive.



There is a risk however, that in the event that these Local Radio Multiplex Services remaining uncompetitive, small-scale DAB might become the back door for a quasi London-wide multiplex outlet, something about which the regulator might take a view.

South of the River Digital will prioritise capacity take-up from radio services seeking to reach the South London coverage area only. We propose to execute this in the same way that Ofcom mandates reserve capacity for C-DSP services. South of the River 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 small-scale DAB development.

#### Integration of our technical plan into the business plan

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. 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.

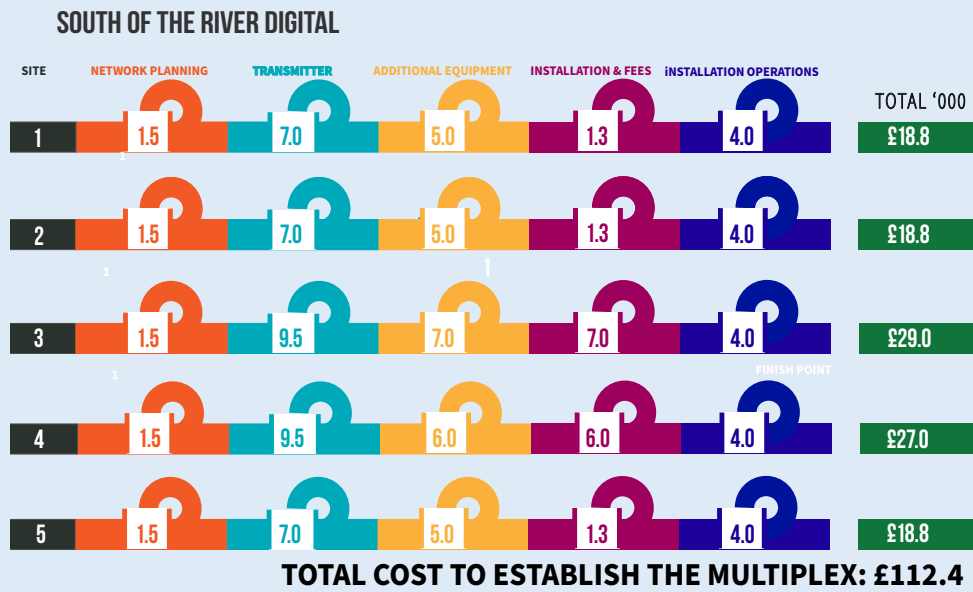
This approach means that while our network, by simple comparison, may not at first glance appear to be the cheapest in terms of financial outlay, it will over time, save the company money. This is why our establishment costs reflect a higher level of CAPEX.

This licencing Round 5 application combined with the experience gained from members of our group being participants or key players in each of the earlier licensing Rounds, means we have a high degree of confidence in the accuracy of the figures presented. Our figures are also supported by a line-by-line listing of components and validated by a detailed quotation from Digris.

Establishment of the service expenditure is broken down by individual transmitter site. This is because the establishment 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.

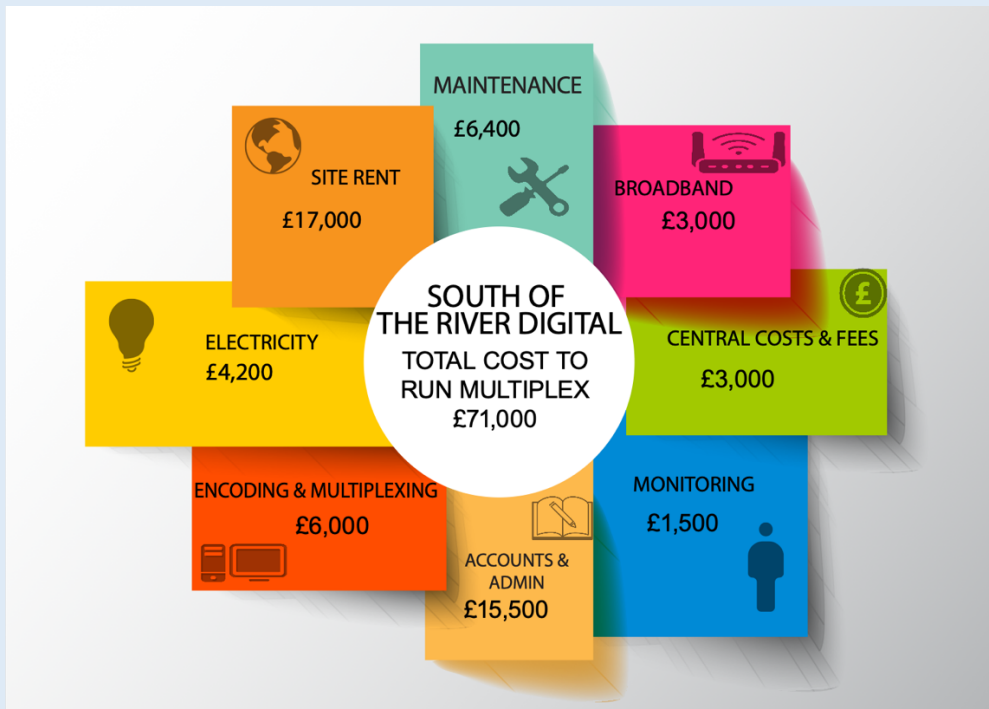
The graphic overleaf demonstrates our Establishment of Service costings.

Establishment of Service costings



Turning to operating costs, these are mostly fixed. Below we have set out the key areas of planned expenditure.

The illustration below shows our whole service running costs



*Excludes borrowing costs*

### Conclusion/summary

South of the River Digital has developed its business plan after taking account of six key factors – the market, our price-point, the listeners we will serve, our environment, pan-London coverage and the combining of our technical plan with our business plan. By considering each element in a holistic manner, we are able to establish a business plan for this multiplex service within a solid framework that can weather potential disruption that may be beyond our direct area of control and enable us to establish a credible multiplex service for South London.

3.19 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)

A single source of funding will provide the Capital necessary to launch this radio multiplex service.

Added to the establishment of service amount of £112,400, as shown in 3.17 above, is the required sum to cover operational expenses and a modest contingency fund (£9,100). This brings the total available funds to establish the radio multiplex service to £121,500.

Each shareholding director has agreed, by signing a Memorandum of Understanding, to lend South of the River Digital the necessary funds to cover-off 100% of the total funding required to establish this radio multiplex.



## Relevant expertise and experience

- 3.22 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.)

**A Senior Management Team (SMT) comprises six persons who collectively bring the necessary experience.**

**Our SMT is structured to be agile and able to cope with change by utilising a pooled knowledge base that we believe is second to none.**

South of the River Digital comprises a group of seven directors, each 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 - our Senior Management Team (SMT).

Day-to-day activities of the SMT

Based on evidence from the small-scale radio multiplex trials and Round 1 operational services, 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 both trial multiplex operators and licenced small-scale DAB 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 – considerably more during the establishment of the service.

### The members of the SMT

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

The relevant experience of the South of the River Digital's SMT is set out overleaf.

### **Lawrence Galkoff – South of the River Digital Director**

Lawrence has been the proprietor of Lawrence Galkoff Associates for 25 years providing services to TV and radio broadcasters. He was Technical Director, Host Broadcast Team for the Eurovision Song Contest, Liverpool, responsible for delivering audio and visual output to broadcasters and other platforms worldwide and being responsible for technical elements including power, OB trucks, commentator facilities and connectivity. Lawrence is also engaged by ITV Sport on blue riband live events such as FA Cup football. The second string to Lawrence's bow is with Radioplayer Worldwide. Here, he has built strong working relationships with both European, north American broadcasters and allied organisations. This involves negotiating and managing contacts with international broadcasters using the platform. This work continues to give him valuable insight into the radio industry at all levels.

Lawrence has played a long-established role in community radio, building studios and providing and installing transmission systems. He has also worked as an advisor to a number of community radio stations going back to the earliest days of Access Radio. Additionally, over time, he has set up and run some ten RSL services in various parts of the UK.

Previously, Lawrence worked for the BBC for 15 years, starting in local radio in the early 1980s. Away from the BBC, he was part of the on-call maintenance team for the commercial radio DAB London II network of transmitters. Since the inception of DAB radio in the 1990s, Lawrence's recognition of the positive potential of the platform remains a driving force in him. Recently, WorldDAB asked Lawrence to address the Balkan broadcast industry on the UK model of small-scale DAB.

### **Ian Wallace – Executive Manager**

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 – Executive Manager**

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 1/3<sup>rd</sup> 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 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 – South of the River Digital Director**

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 – Executive Manager**

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.



3.23 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

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

**Identifying our priorities, tackling - sites, supply, operations and consideration of other spectrum users, as well as dealing with other key activities on our coverage roll-out agenda, South of the River Digital will build a compliant radio multiplex.**

**Operationally live in 12 months from award.**

Seven areas of activity that need to be addressed have been identified. Accomplishment of these will bring about the establishment of the multiplex service in a timely manner. These areas, which also feature in our high-level Gantt Chart are: Company Housekeeping; Premises; Interference Management; Antenna/MUX & Equipment; Connection and Distribution; Customer & Carriage; and Conclusion Procedures.

To undertake this work, a team of experienced individuals who have worked successfully on previous small-scale DAB licensing rounds, has been appointed by the Board. We have named this group our Senior Management Team (SMT). The SMT will be responsible for achieving full operational capability of the radio multiplex service and their progress will be measured against the activity areas set out in the Gantt Chart.

The SMT will report to the Board.

Over and above this we have 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

For a variety of reasons an objective which tends to have a longer than expected lead-time centres around completing agreements to use transmission sites. This is because the nature of the sites most likely to be adopted by small-scale DAB networks are unlikely to be purpose-built but rather individually owned commercial or residential premises. To reach a successful installation agreement, an appreciation of owner sensitivities and a meticulous approach to progress chasing is required. We are fully mindful of this and have as a resource, experienced individuals each of whom will play their part in the fundamental aspect of managing site owner relations and making certain that this project is not delayed unnecessarily.

## 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 more importantly, suitably qualified engineers, in the months which will follow Ofcom's announcement of the outcome of its Round 5 assessments.

Our approach, 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 – analogue and digital transmission, is both broad enough and deep enough to deliver our project in a timely manner. Underpinning this is the support from our transmission provider Digris, 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

The collective administrative skills of our SMT will ensure that draw-downs of financial resource and implementation of the timetable, along with an appropriate degree of risk management, will allow us to achieve our install and build projections. Our target is to complete all work on time and under budget.

## Potential interference resolution

We are familiar with the potential risk of both co-block and hole punching interference and the possible amount of skill needed and time required, to resolve this matter and so we have designed our network with care. With our technical partner and stakeholder Digris, we can undertake detailed measurements and assessments. For example, through Digris we are able to conduct our own drive-test analysis as a swift way to resolve ACI matters, should they arise.

With these factors in mind, and allowing adequate time for finalising and receiving approval of our technical plan, we anticipate the establishment of our service within a year.

Our high-level Gantt chart lists 26 key activities grouped together under seven areas of activity set out above. While many individual activities (shown in green) 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 we can expect to be operationally live in 12 months from award.

- 3.25 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):

**The table overleaf shows 14 community services which have undertaken to apply for C-DSP licences in order to operate their services on the radio multiplex.**

**Eight of these radio stations (highlighted) are participants in South of the River Digital.**

**Table of participants and others proposing to provide a C-DSP service**

	Apply for C-DSP	HOT or MOU	EOI	Community Heritage Analogue	Participant
Maritime	X		X	X	
<b>Nomad Radio</b>	X	X		X	X
<b>Flex FM</b>	X	X		X	X
<b>Beat South Ø</b>	X	X		X	X
Select Radio	X	X		X	
Rainbow Radio	X	X		X	
<b>Riverside Radio</b>	X	X			X
<b>My Greek Radio</b>	X	X			X
Croydon FM	X		X	X	
<b>Croydon Central Radio</b>	X	X			X
<b>Ruach Radio</b>	X	X			X
<b>Gaydio Ø</b>	X	X		X	X
Radio W. Middx. Hospital	X		X		
Trans Radio	X		X		

Ø = out of area community radio proposing to open production facilities inside the advertised area.

HOT – Signed Heads of Terms document

MOU – Signed Memorandum of Understanding document

EOI – Signed Expression of Interest

South of the River Digital C-DSP Participants:

**Flex FM**

Flex FM (Flex FM Radio Ltd) holds 15% of the company's shareholding. This service intends to apply for a C-DSP licence. Flex FM is licenced by Ofcom: [CR101737BA/2](#)

## **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 South of the River 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

## **Beat South**

Bang Media and Entertainment operate community radio service The Beat serving Stonebridge and Harlesden. Bang Media and Entertainment is keen to continue its outreach to its target audience living in South London. To this end Bang Media propose to establish a studio and production facilities in South London.

Bang Media and Entertainment Ltd holds 15% of the company's shareholding and would qualify to apply for a C-DSP licence. Bang Media's The Beat is licenced by Ofcom: CR000068BA/4

## **Riverside Radio**

Riverside Radio is a fully fledged community radio station. Unable to secure a community radio FM licence it's online radio service has benefitted through taking carriage as a DSP licensee on the London trial multiplex. Riverside Radio has twice won an award for Digital Radio Station of the Year at the Community Radio Awards.

Riverside Broadcasting CIC holds 5% of the company's shareholding and intends to apply for a C-DSP licence.

**Nomad Radio**

Nomad Radio (Nomads Media CIC) holds 1% of the company's shareholding. This service intends to apply for a C-DSP licence. Nomad Radio is licenced by Ofcom: CR101743BA/1

**Ruach Radio**

Ruach Radio (Order My Steps Ltd) is an online community radio service based in Brixton. It currently broadcasts on the London trial multiplex as a DSP licensee. Ruach Radio holds 1% of the company's shareholding and intends to apply for a C-DSP licence.

**Croydon Central Radio (CCR Radio Ltd)**

CCR Radio is an online community radio service based in and focused on Croydon. CCR Radio holds 1% of the company's shareholding and intends to apply for a C-DSP licence.

**MGR My Greek Radio**

MGR My Greek Radio is an online community radio service. The radio station proposes to establish studio and production facilities in South London. My Greek Radio holds 1% of the company's shareholding and intends to apply for a C-DSP licence.

## Demand or support from programme providers

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

<p><b>42 services have signed up to, or signalled support for South of the River Digital's proposed service.</b></p> <p><b>This evidence of the extent of demand is underpinned by 14 services who would qualify for a C-DSP licence.</b></p> <p><b>8 of these services are analogue heritage community radio services</b></p>		
Name of service provider and station name (if known)	Proposed C-DSP or DSP	Nature of evidence of support provided
CCR Radio Ltd <b>Croydon Central Radio</b>	C-DSP	Signed MOU - Participant
Flex FM Radio Ltd <b>Flex FM 101.4</b>	C-DSP	Signed MOU - Participant
Gaydio CIC <b>Gaydio</b>	C-DSP	Signed MOU - Participant
The Greek Voice of London C.I.C. <b>MGR My Greek Radio</b>	C-DSP	Signed MOU - Participant
Nomads Media CIC <b>Nomad Radio</b>	C-DSP	Signed MOU - Participant
Riverside Broadcasting C.I.C. <b>Riverside Radio</b>	C-DSP	Signed MOU - Participant
Order My Steps Ltd <b>Ruach Radio</b>	C-DSP	Signed MOU - Participant
Bang Media and Entertainment Ltd <b>Beat South</b>	C-DSP	Signed MOU - Participant
Select Radio Ltd. <b>Select Radio</b>	C-DSP	Signed Heads of Terms
Rainbow Radio Ltd <b>Rainbow Radio</b>	C-DSP	Signed Heads of Terms



Greenwich Media CIC <b>Maritime Radio</b>	C-DSP	EOI
Croydon FM CIC <b>Croydon FM</b>	C-DSP	EOI
Radio West Middlesex <b>Radio West Middlesex Hospital</b>	C-DSP	EOI
Trans Radio UK <b>Trans Radio</b>	C-DSP	EOI
Akash Radio Leeds Ltd <b>Akash Radio</b>	DSP	Signed Heads of Terms
All Star Ents Ltd <b>All Star Youth Radio</b>	DSP	Signed Heads of Terms
AFX Media Group <b>Asian FX Radio</b>	DSP	Signed Heads of Terms
BIP Global <b>BIP RADIO</b>	DSP	EOI
Boom Radio Ltd <b>Boom Light</b>	DSP	Signed Heads of Terms
Chris Merriman Media	DSP	EOI
Cosoro Ltd <b>Cosoro Radio</b>	DSP	Signed Heads of Terms
African and Caribbean Business Ventures Ltd <b>Culture City Radio</b>	DSP	Signed Heads of Terms
Eirewave Ltd <b>Eirewave</b>	DSP	Signed Heads of Terms
Children's Radio UK Ltd <b>Fun Kids</b>	DSP	Signed Heads of Terms
GreekBeat Radio Ltd <b>GreekBeat Radio</b>	DSP	Signed Heads of Terms
Happy Radio UK Ltd <b>Happy Radio</b>	DSP	Signed Heads of Terms
Pearce Media Group <b>Juice</b>	DSP	EOI
Life Radio UK <b>Life Radio</b>	DSP	Signed Heads of Terms
London Music Radio Ltd <b>London Music Radio</b>	DSP	Signed Heads of Terms
Credible Media Ltd <b>MMH – Home of Rock Radio</b>	DSP	Signed Heads of Terms
Credible Media Ltd <b>Mom's Spaghetti Radio</b>	DSP	Signed Heads of Terms
Thames Radio Ltd <b>Nation Easy Radio</b>	DSP	Signed Heads of Terms
Thames Radio Ltd <b>Nation 80s</b>	DSP	Signed Heads of Terms

Thames Radio Ltd <b>Nation 90s</b>	DSP	Signed Heads of Terms
Digris Ltd <b>Open Broadcast Radio</b>	DSP	Signed Heads of Terms
Starpoint Radio Limited <b>Starpoint Radio</b>	DSP	Signed Heads of Terms
Bradford City Radio Ltd <b>Sunrise Radio</b>	DSP	Signed Heads of Terms
Spice Entertainment Ltd <b>Sunrise Radio Gold</b>	DSP	Signed Heads of Terms
The Groove <b>The Groove</b>	DSP	Signed Heads of Terms
Like Broadcasting North Limited <b>Tomorrowland OWR</b>	DSP	Signed Heads of Terms
Al Shirkatul Islamiyyah <b>Voice of Islam</b>	DSP	Signed Heads of Terms
XRP Media CIC <b>XRP RADIO</b>	DSP	EOI

## 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?

### **156 potential services contacted**

**A planned approach towards potential carriage customers, backed up by industry wide editorial and advertising, bolstered by our own website, has enabled South of the River Digital to reach out to all manner of radio stations.**

**We have been transparent in sharing our aims and our terms of business.**

**During the licence period, our framework for carriage customer dealings, will support our fair and effective competitive selection process.**

The South London advertised area is home to eight analogue community radio services and one local commercial radio station.

Flex FM, Select Radio, Rainbow Radio, Rerezent, Resonance FM, Croydon FM, Nomad Radio, Maritime Radio and Radio Jackie.

We approached each service individually. Radio Jackie was first contacted by members of our group six years ago during the early days of the Brighton SSDAB trial.

Altogether six of the eight community radio stations have agreed to take carriage, signing Memorandum of Understanding/Heads of Terms or EOI documents.

Our table in 4.3 above is repeated overleaf. It shows the C-DSP services we propose to carry along with those who are participants on South of the River Digital:

**Table of participants and others proposing to provide a C-DSP service**

	Apply for C-DSP	HOT or MOU	EOI	Community Heritage Analogue	Participant
<b>Maritime Radio</b>	<b>X</b>		<b>X</b>	<b>X</b>	
<b>Nomad Radio</b>	<b>X</b>	<b>X</b>		<b>X</b>	<b>X</b>
<b>Flex FM</b>	<b>X</b>	<b>X</b>		<b>X</b>	<b>X</b>
<b>Beat South Ø</b>	<b>X</b>	<b>X</b>		<b>X</b>	<b>X</b>
<b>Select Radio</b>	<b>X</b>	<b>X</b>		<b>X</b>	
<b>Riverside Radio</b>	<b>X</b>	<b>X</b>			<b>X</b>
<b>Rainbow Radio</b>	<b>X</b>	<b>X</b>		<b>X</b>	
<b>My Greek Radio</b>	<b>X</b>	<b>X</b>			<b>X</b>
<b>Croydon FM</b>	<b>X</b>		<b>X</b>	<b>X</b>	
<b>Croydon Central Radio</b>	<b>X</b>	<b>X</b>			<b>X</b>
<b>Ruach Radio</b>	<b>X</b>	<b>X</b>			<b>X</b>
<b>Gaydio Ø</b>	<b>X</b>	<b>X</b>		<b>X</b>	<b>X</b>
<b>Radio West Middlesex Hospital</b>	<b>X</b>		<b>X</b>		
<b>Trans Radio</b>	<b>X</b>		<b>X</b>		

Ø = out of area community radio proposing to open production facilities inside the advertised area.

HOT – Signed Heads of Terms document

MOU – Signed Memorandum of Understanding document

EOI – Signed Expression of Interest

#### Measures taken prior to Ofcom’s advertisement announcement

Pre-pandemic and in anticipation of Ofcom advertising the South London area imminently, a group was formed comprising Flex FM, Lawrence Galkoff, Paul Boon and others. At that time South of the River Digital reached out to Maritime Radio a service which, in those early days, expressed interest in becoming involved in the group.

In January 2020 we built our website which explained what small-scale DAB could offer the different types of radio services in our area. We outlined our plans and invited responses from interested parties. Email and phone contact was made with the other community radio services up until the end of February 2020.

In March 2023 South of the River Digital resumed making contact, with not just the analogue community radio services local to South London, but online services and other radio stations too.

Approaching a wide range of potential service providers, following Ofcom's advertisement [announcement](#)

Following Ofcom's advertisement announcement we wrote to services such as Rinse FM and redoubled our efforts in contacting Resonance, Reprerent, Croydon FM and others. Two of these other services Riverside Radio and Ruach Radio were community radio services carried on the London trial multiplex but were not analogue licenced services.

To each of all the trial multiplex programme services we explained that we were not competing with the trialist U.DAB, but that we were proposing to apply for a licence to better serve the South London area, specifically.

South of the River Digital, on the day following Ofcom's licensing Round 5 announcement, placed an advertisement on the Radio Today website. Our advertising campaign was shared with applicants for two neighbouring radio multiplex advertisement areas (North London and West London). These advertisements took the reader to a London page, hosted by a neutral entity Opendab CIC, 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 which ran for 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 Power of Mind, RCS2GO Music

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**

## Trial service DSPs

In addition to writing/emailing analogue community radio services, we wrote to commercial services being carried on the London trial explaining Ofcom's revision of the areas to be served and how South London in particular was to be a discrete licence area in its own right. We also went out of our way to explain how Ofcom emphasised that radio services were not restricted in expressing interest in having their service carried by any number of multiplex applicants.

South of the River Digital is pleased that our extensive programme of reaching out to radio services has been successful. As shown in this application, our company is 54% owned by community and C-DSP qualifying radio stations while our list of radio service providers contains no fewer than 14 C-DSP community radio services with eight of these being participants in the applicant company.

A mainstay of our promotion was our website. This explained our intentions and set out how radio services could contact us and get involved. The site (Home Page shown below) has received 863 hits.

The screenshot shows the home page of the South of the River Digital Radio website. The header features a navigation menu with links for Home, About, What is DAB?, Coverage, Join Us, Register, and News. The main heading is "South of the River Digital Radio" with the tagline "A DAB pathway for South London". Below this is a "Welcome" section with a blue circular logo on the left. The text in the welcome section explains the organization's mission to enable radio stations in South London to broadcast to millions of potential listeners using Digital Audio Broadcasting (DAB) technology. It highlights the benefits of DAB, such as reduced costs and improved sound quality, and mentions that South of the River Digital Radio has been a trial since 2010. A list of criteria for potential radio services is provided, including launching a new service, reaching digital audiences, student or hospital stations, and online streaming services. The page concludes with a call to action to visit the website and complete a registration form. At the bottom, there are four small images showing various South London landmarks and a blue circular logo on the left.

**South of the River Digital Radio**  
A DAB pathway for South London

**Welcome**

info@southlondonradio.com

Facebook, Twitter, Instagram, LinkedIn

Welcome! We are South of the River Digital Radio and we seek to enable radio stations in south London to broadcast to the millions of potential listeners who live in our area. Offering carriage over our radio transmitters into the homes and cars of listeners, South of the River Digital Radio aims to provide a route for broadcasters to go digital using Digital Audio Broadcasting (DAB) technology. The DAB method of broadcasting means that around 25 radio stations can be 'carried' on a single frequency and thanks to a recent development 'small-scale DAB' (SSDAB) allows for the cost to be reduced, which in turn allows for delivery of radio station output at a fair price that is within the reach of most small-scale broadcasters. Already as a trial, SSDAB has over the last seven years seen a flourishing of new radio stations, formats and an opening to a new wave of radio professionals and volunteers. Added to this the use of DAB+ improves sound quality and the listener experience. We aim to formulate a stable and reliable transmission service that better serves broadcasters, rather than the existing system, which represents a barrier to the little guys. South of the River Digital Radio will provide a digital path for small-scale radio. To achieve this, South of the River Digital Radio benefits from excellent operational, technical and engineering connections with several existing SSDAB operators.

If you are:

- Interested in launching a new radio service, or
- Seeking to reach digital radio audiences across South London
- A student radio station
- A hospital radio station
- An Ofcom licenced radio service (community or commercial)
- An online radio/streaming service

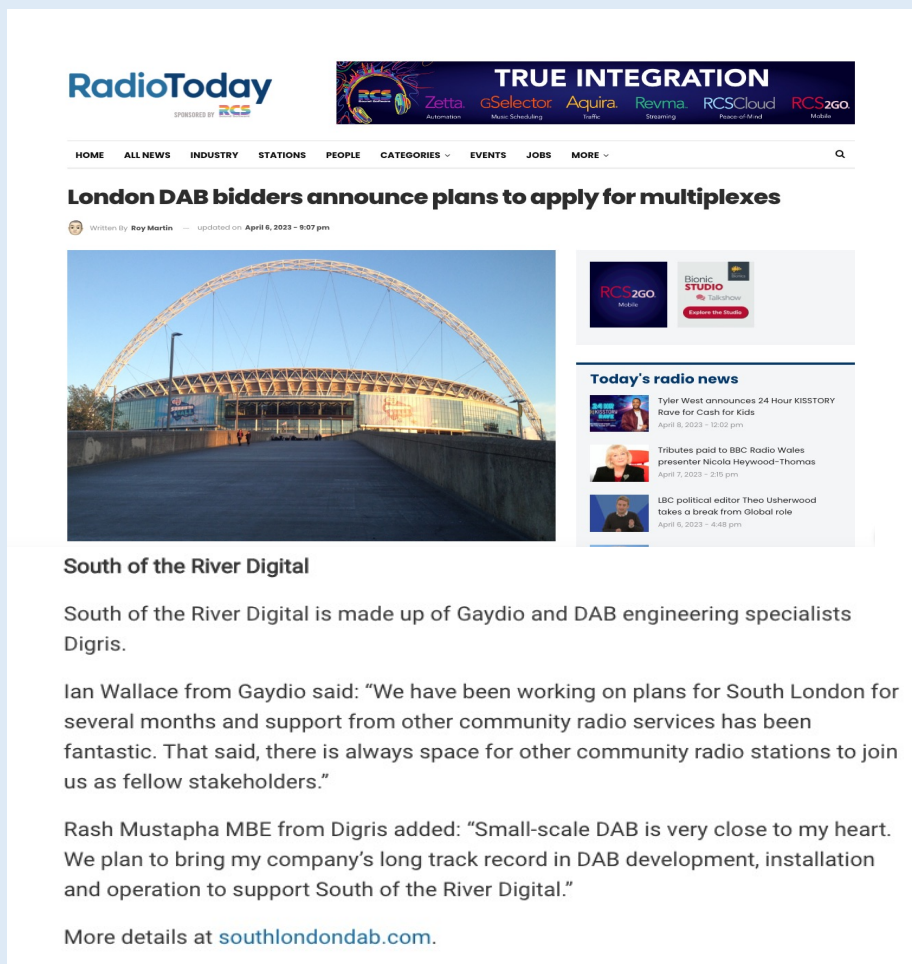
Then this is the website for you.

We hope the following pages on this website will be informative and guide you through the various steps. Finally, please go to our 'Register' page and complete the form as your first steps towards going DAB with South of the River Digital Radio.



To help us achieve a strong level of awareness, support and commitment, 156 radio services were contacted directly. In addition to our eight C-DSP participants, six further C-DSP services have signed Heads of Terms or Expressions of Interest. Similarly for DSP services, a total of 28 services have signed Heads of Terms or Expressions of Interest.

Below is some editorial coverage which we achieved in Radio Today following Ofcom's Round 5 announcement. This early coverage allowed plenty of time for service providers seeking carriage, to get in touch. With our website link displayed in the story, we were able to rely on our website to explain our proposals and to invite interested parties to join us in our South London DAB adventure.



The screenshot shows a webpage from Radio Today. At the top, there is a navigation bar with the Radio Today logo and a 'SPONSORED BY RCS' tag. Below the navigation bar is a banner for 'TRUE INTEGRATION' with logos for Zetta, gSelector, Aquira, Revma, RCScloud, and RCS2GO. The main headline is 'London DAB bidders announce plans to apply for multiplexes', written by Roy Martin and updated on April 6, 2023. The article features a large image of the London Stadium at night. To the right of the main image is a sidebar with 'Today's radio news' and a 'RCS2GO' logo. Below the image, the text reads: 'South of the River Digital is made up of Gaydio and DAB engineering specialists Digris. Ian Wallace from Gaydio said: "We have been working on plans for South London for several months and support from other community radio services has been fantastic. That said, there is always space for other community radio stations to join us as fellow stakeholders." Rash Mustapha MBE from Digris added: "Small-scale DAB is very close to my heart. We plan to bring my company's long track record in DAB development, installation and operation to support South of the River Digital." More details at southlondondab.com.'

### 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

1. Our website will showcase our finalised carriage charges and the process for applying for carriage.
2. We will pledge on the website that we will not charge more than the rate-card rate shown.
3. 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.

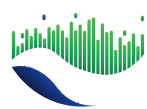
We recognise that there is a step-change between formulating a Fair and Effective policy and implementing one. Here, we will draw on the experience of Will Jackson who undertook this responsibility as part of his remit as radio multiplex account manager at Arqiva. With each member of our SMT contributing,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

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

Our fear is that should the marketing function of carriage capacity become 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 would be found wanting.

In summary, South of the River Digital can be seen to have developed a rigorous framework with defined areas of activity. This framework relates to all capacity sold not some part 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 South of the River Digital small-scale radio multiplex.





### Application in numbers

Adult population coverage	<b>93%</b>	within advertised area
Overlap with local radio multiplex service	<b>31.8%</b>	below the LRMS 40% limit
Overspill outside the advertised area	<b>23.1%</b>	± 1.6%
Business plan launch expenditure	<b>£112,400</b>	to establish the service
Technical plan with	<b>5</b>	sites
Digris technical partner/stakeholder	<b>11 years experience</b>	DAB specialist
Average cost per transmitter	<b>£8,000</b>	per site
Total install average cost	<b>£22,480</b>	per site
Timetable - operationally live	<b>12</b>	months
Senior Management Team	<b>6 members</b>	with 200 years community and/or commercial radio sector experience
Community radio participants	<b>8</b>	
C-DSP participants voting power	<b>54%</b>	in the applicant company
Demand or support	<b>14</b>	total number of C-DSPs
Demand or support	<b>28</b>	established DSP radio services
Contract or offer to contract with over	<b>156</b>	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:**

USHA PARMAR

**Date of application:**

28 JUNE 2023

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

Company director

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