
Small-scale radio multiplex licence

Application form – Part A (public)

City West Digital

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

CITY WEST DIGITAL CIC

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

WEST LONDON

1. Overview

City West Digital

Coverage

City West Digital's coverage extends to 91% of the advertised area adult population

The licence areas of the four participant heritage community radio stations will be well served

Overspill outside the advertised area - below 10%

Establishing the radio multiplex service

A task force created - comprising individuals with the depth and breadth of know-how required to establish this radio multiplex service

A meticulously thorough budget which complements the funds required to build-out this radio multiplex, so as to accomplish the establishment of the service in 12 months

Technical partner Digris will be engaged to deliver and maintain a multi-site DAB network

The ongoing operation of the radio multiplex has been planned with service resilience, shifting market conditions and consumer requirements in mind

C-DSP providers + demand or support from programme providers

Through long-term one-to-one networking, we have reached a point where four heritage community radio services are participants in this Community Interest Company and hold 20% of voting power

Nine services will apply for C-DSP licences; two further C-DSP services have expressed interest

37 services have signed documentation or expressed interest in carriage

Fair and effective competition

Creative use of media and supported by an established website, City West Digital has built a catalogue of diverse radio services to showcase on the West London radio multiplex.

Over 50 radio services approached, more than half intend to take carriage - subject to availability

A cornerstone of our CIC will be community values and fair treatment towards service providers in a competitive environment

2. Extent of proposed coverage area

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

The City West Digital technical plan adopts a careful approach which identifies the factors likely to impede our signals, while balancing these with a proposal that considers other spectrum users.

With City West Digital, all community and other local radio broadcasters can serve their audiences on a digital platform that can be expected to reach 91% of the licenced area's adult population.

Overspill into adjacent areas – less than 10%; Local Radio Multiplex Service population served – less than 23%

Coverage overview

Our target is to deliver a robust signal into an area identified by Denham, Stanmore and Kingsbury in the north, Egham, Esher, Chessington and New Malden in the south, Langley and Iver Heath in the west and Wandsworth, Chelsea and Willesden in the east.

In terms of topography, the greater part of the advertised area is characterised by low lying ground circa 9 metres to 28 metres A.O.D. Higher ground is a feature stretching from the north of Uxbridge to Ruislip and on to Harrow. Richmond Park and Wandsworth to Wimbledon Common in the east of the area, sees modest elevation of up to 50 metres. With the exception of Egham to the west, St Georges Hill - south of Weybridge, and Esher, areas of the highest ground are across the south. However, the highest areas of elevation are adjacent to these localities and these are mostly outside Ofcom's defined area.

The challenge presented by this topography is that to reach the centre of the advertised area, a distance of up to 14km from the polygon edge, requires the use of elevated man-made structures, in order to ensure that the area advertised is properly served.

Our proposed network achieves this, supported by additional transmitters near the polygon edge pointing towards the area's centre and by making effective use of the power sum.

Of note, the level of substantial building clutter increases further east, towards the centre of London. This also presents a coverage challenge which we have sought to overcome.

Our technical plan has been developed to ensure even and consistent coverage throughout the advertised area.

Planning robust coverage into the editorial areas of seven community radio services

The City West Digital licence application is aligned with the coverage area interests of seven analogue heritage community radio services: Insanity Radio in Egham, The Beat in Willesden, Westside in Southall and Desi Radio (AM) covering West London and focussed on Southall, each of whom are participants in City West Digital, along with Flex FM in Wandsworth, Nomad Radio – Hammersmith/Shepherd's Bush and Hayes FM - Hayes.

Our technical plan achieves a field strength of 69dB μ V/m in Southall, Egham and Wandsworth and 63dB μ V/m in Willesden and Hammersmith.

Planning coverage, that is spectrally efficient

In considering the entirety of the advertised area, it has been necessary to develop a plan using six locations to achieve serviceable coverage, these locations are Hillingdon, Southall, Harrow, Kingston, Southfields and Egham.

We describe our network as having three sites in comparatively central locations and three strategically placed sites each targeted with the specific objective of ensuring more than adequate reception for local listeners nearby. Each transmission system in the network employs directional antenna with optimised network power levels demonstrating a disciplined approach to planning. Collectively, these sites, deliver predicted coverage both centrally and up to the perimeter line while at the same time each minimises the wider impact of causing unacceptable outgoing interference.

This technical plan has also been devised to afford greater opportunity to be compatible with the overall spectrum plan for the macro area and beyond. For example, we have not sited parts of our network on the highest ground to the South, rather we have used sites at a lower height and allowed the terrain to shield our signals, so much as is practicable, beyond the advertised area.

Our multi-site proposal ensures that in the event of a catastrophic failure at any one site, at any time, partial coverage in the order of 71% of population or greater will be maintained. We take this approach as being an essential requirement, given that the West London advertised area represents one of the major radio markets in the UK. We also outline our approach to resilience in Annex 5 – Network Diagram.

It is estimated that at least 363,000 adults (13% of the coverage total) 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.

Extent of our predicted coverage

The table below/overleaf summarises the extent of our predicted coverage:

West London	Adults 15+	Percentage
Advertised area population:	2,267,807	100.0%
Predicted coverage inside polygon:	2,054,267	90.6%
Predicted coverage outside polygon:	224,726	9.9%
Local DAB service 1. LRMS: London:	10,102,817	100.0%
Total predicted pop. coverage inside LRMS:	2,278,993	22.6%

Outside the macro area

With localities such as Thame and Hook being less than 35 kilometres from the polygon line, we have assessed our outgoing interference to the 38 dB μ V/m contour. We are confident that our technical plan will be compliant and that it will not deliver significant interference into areas outside the macro area with but one borderline exception, the Basingstoke licenced area.

The small-scale DAB licence for Basingstoke was awarded as part of licensing Round 1 and is operational on block 8B. The nature of the landscape between Basingstoke and West London prevents measures of necessary isolation, including terrain shielding, being applied with any great effect.

The Basingstoke service, since licence award has benefited from a heavily revised technical plan that is generous in terms of its technical parameters – a directionally spread 250 Watts e.r.p. from a height of 203 metres serving the main population centre of 86,652 adults, just three kilometres away.

The incoming effect of the Basingstoke licensee's field strength at 38dB μ V/m or greater is such that large parts of the South East Macro area are virtually sterilised, to the extent that co-block frequency allocation using conventional planning standards is highly unlikely to be an option in the following six advertised areas: South Hertfordshire, South Buckinghamshire, Guildford & Woking, Alton Petersfield & Haslemere, Reading and West London. While Ofcom's licence advertisement makes provisions for four of these six licence areas, South Hertfordshire and West London are required to contemplate co-block interference into Basingstoke.

To demonstrate the impact of Basingstoke on West London and vice versa, a planning analysis showing a 'real life' assessment, modelling a field strength difference of 25dB μ V/m between the two signals (Basingstoke actual and City West Digital proposed) was commissioned. This shows that Basingstoke interferes with the proposed West London coverage to a much greater extent than any proposed signals from West London would affect the Basingstoke area.

As an alternative, the option of a reduction in power in the direction of Basingstoke (an expectation from Ofcom, highlighted on Page 82 of the licence advertisement) was explored. In this model it was found that coverage inside the West London advertised area became patchy and

created a reduction in population from 91% of the advertised area, to approximately 76%. Such a move, if applied, would have the effect of disenfranchising over 340,000 West London adult consumers from a serviceable signal.

City West Digital is certain that Ofcom will be aware of this issue, and so we respectfully request that this licence application be considered on the assumption that Frequency Block 8B will not be allocated to West London.

Oxfordshire & Sussex - 10B

The detailed transmission network and hole-punching assessments submitted by City West 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 City West Digital proposal for the West 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.

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 audiences in neighbouring polygons. The extent of such overlap has been kept to 9.9% of the permitted coverage total.

Potential for hole-punching

In planning coverage and developing this technical plan we have made allowances to isolate the common causes of A.C.I. 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, 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.

Conclusion/summary

Our predicted coverage reaches 2,278,993 adults in total. 91% of adults inside the West London polygon would be served. Overspill has been constrained to less than 10%.

We have set out a description of the advertised area and the particular coverage challenges it presents. Having explained our aim to achieve even coverage throughout the area, we have amended our plan as much as practicable, to meet wider planning constraints.

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, but we have highlighted the impact of these restrictions. With the exception of incoming interference from the Basingstoke licensee - assuming frequency Block 8B were to be applied, there is not an expectation that such requirements would impact upon the viability of the proposition of City West Digital or the usefulness to the four community radio stations who 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):

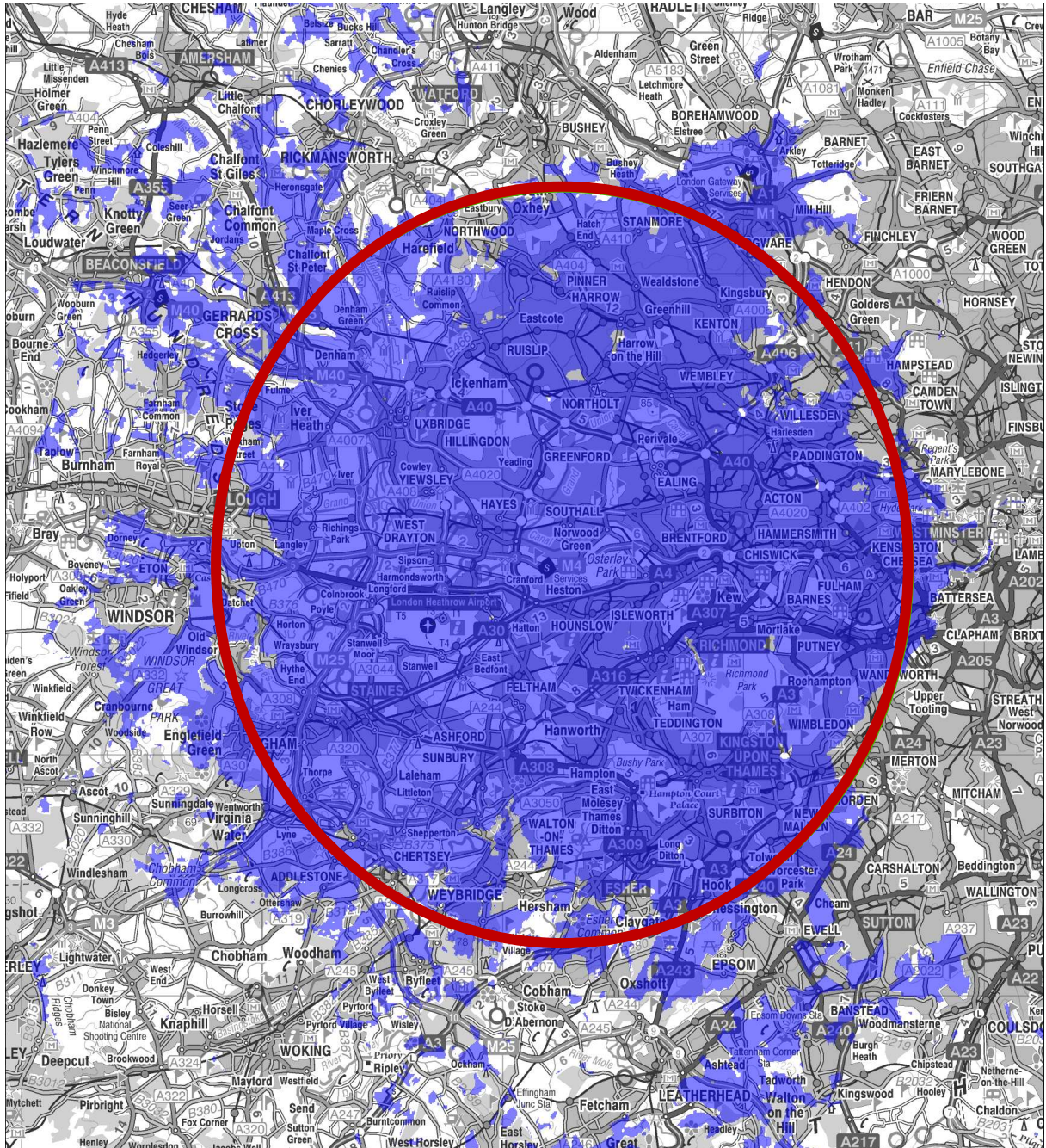
Site name	NGR	Antenna height (m agl)	Antenna type proposed with bearing	New or existing antenna	ERP (W)
Hillingdon	TQ068818	36m	2 tiers, dipole 290 degrees ETN	New	180W
Southall	TQ135812	42m	2 tiers, dipole 330 degrees ETN	New	180W
Harrow	TQ162878	36m	2 tiers, dipole 330 ETN	New	160W
Kingston	TQ197703	28m	2 tiers, dipole 290 degrees ETN	New	180W
Southfields	TQ240736	50m	2 tiers, cardioid 300 degrees ETN	New	170W
Egham	SU998705	24m	3 element uda-yagi 90 degrees ETN	New	190W

In areas such as London, the demand placed on spectrum usage is highest. 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 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).

Please see coverage map overleaf

City West Digital Coverage Map showing
91% adult population coverage within the advertised area



digris

63dBμV/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):

City West Digital CIC

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

12426138

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:

160 Uxbridge Road, Middlesex UB4 0JQ

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
Lawrence Galkoff	21 Culverlands Close, Stanmore HA7 3AG	UK	<u>Director:</u> Lawrence Galkoff Associates Ltd. <i>TV programme production</i> <u>Director:</u> 103-105 Birkbeck Road Management Ltd <i>Residents property management</i>	

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

			<p><u>Director:</u> Manchester DAB CIC <i>Radio Broadcasting</i></p> <p>Reasons 2B Cheerful Ltd <i>dormant</i></p> <p><u>Trustee:</u> Prison Radio Association <i>Educational support services</i></p> <p><u>Director:</u> South of the River Digital <i>dormant applicant company</i></p>	
Ajit Khera	84 Westbourne Park Road, London W2 5PL	UK	<p><u>Director:</u> The Panjabi Centre Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Duncrest Limited <i>Real estate</i></p> <p><u>Director:</u> Swordshine Limited <i>Real estate</i></p>	
Paul Boon	160 Uxbridge Road, Hayes, Middlesex UB4 0JQ	UK	<p><u>Director:</u> Opendab CIC <i>Radio Broadcasting</i></p> <p><u>Director:</u> Manchester DAB CIC <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> North London Digital <i>dormant applicant company</i></p>	

Usha Parmar	160 Uxbridge Road, Hayes, Middlesex UB4 0JQ	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>Broadcasting & Hospitality</i></p> <p><u>Director:</u> Infocus Digital Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Leeds Digital Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Bradford Digital Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> BBD Digital 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 Media Ltd <i>Radio Broadcasting</i></p> <p><u>Director:</u> Derby DAB Ltd <i>dormant applicant company</i></p> <p><u>Director:</u> South of the River Digital <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>	
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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
The Beat – Bang Media & Entertainment Ltd	5	£0.05	5	5
Desi Radio – The Panjabi Centre Ltd	5	£0.05	5	5
Insanity Radio – RHUL SU	5	£0.05	5	5
Westside Radio – BBA Media	5	£0.05	5	5
Lawrence Galkoff Associates Ltd	27	£0.27	27	27
Ajit Khera	16	£0.16	16	16
Paul Boon	27	£0.27	27	27
Infocus Digital Media Ltd	10	£0.10	10	10
Comments				
20% of the shares in City West Digital are held by analogue community radio participants.				
All participants, 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 No bodies control or are controlled by the applicant City West Digital CIC		

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

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

Full name of individual	Name of body in which individual is a director or designated member
N/A No bodies control or are controlled by the applicant City West Digital CIC	

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

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

Full name of body corporate listed in 3.8	Body corporate controlled
N/A No bodies control or are controlled by the applicant City West Digital CIC	

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

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

Name of body corporate identified in response to question 3.8				
Full name of participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
N/A No bodies control or are controlled by the applicant City West Digital CIC				

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	Usha Parmar is a Trustee of Rishi’s Vision (Charity) and a Trustee of Jai Maa Bhameshwari Kali Mandir (Charity) This information has been provided in order to be

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.

		consistent with information provided in the Declaration for Sunrise Radio (Yorkshire) licence AL000037BA/2 (Bradford City Radio Ltd). Although both charities are founded through the work of religious bodies, we believe Ofcom will regard their objects as being neither of a 'wholly or mainly' religious nature.
An individual who is an officer of a body falling within (b) or (c);	No	
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):
- Is the applicant a current licensee of Ofcom?
No
 - Has the applicant ever held an Ofcom broadcasting licence before?
No
 - Has anyone involved in the proposed service held an Ofcom broadcasting licence or been involved in an Ofcom-licensed broadcast service before?
Yes
 - Does the applicant control an existing Ofcom licensee?
No
 - 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
 - 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)	DS104327	Manchester DAB – awarded SSDAB licence
	CR000061BA/2	Desi Radio – The Panjabi Centre Ltd
	DP102995BA/1	Desi Radio – The Panjabi Centre Ltd
	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
	CR000068BA/4	The Beat
	CR000217BA/3	Insanity Radio
	CR000072BA/5	Westside Radio
	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	Masti Radio (Bradford & Huddersfield Multiplex) 2004 – 2013
	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	Glasgow Small-scale Multiplex Trial service 2016 – 2020
	DP000061BA	Manchester Small-scale Multiplex Trial service since May 2016
	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
	RSL	Mela FM (RSL in Manchester) June 2001
	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)
	DS103911	Leeds Digital Media
	DS103920	Bradford Digital Media
	DS104327	Manchester DAB
(d)		N/A
(e)		N/A
(f)		N/A
(g)		N/A
(h)		N/A
(i)		N/A

- 3.15 Please provide any further information you hold, relating to the past conduct of the applicant or those individuals listed, in regulatory matters or in matters going to honesty and/or compliance, which may be relevant to Ofcom’s consideration of whether or not the applicant is fit and proper to hold a broadcast licence. If the applicant or the form signatory fails without reasonable excuse at this point to declare any matter of which Ofcom subsequently becomes aware, and which we consider to be relevant to the applicant’s eligibility to hold a licence, we will take it into account in determining the question of whether the applicant/licensee remains fit and proper to hold a licence. If you have no information to provide, please respond “N/A”.

N/A

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

No

If yes, please provide the following details:

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

Financial and business plan

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

Agreed and committed funding together with a clear expenditure plan which provides a working capital surplus at launch, backed and supported if necessary, by reserves – City West Digital can demonstrate its ability to establish the proposed service

City West Digital is a Community Interest Company

Being a social enterprise means that our approach to funding, the build-out of infrastructure, our day-to-day operation and trading – the sale of carriage in particular, will each be influenced by our not-for-profit approach.

Yes, we will seek to generate a surplus, but this will be used initially to build-up a reserve in the company and to repay lenders. Beyond this, surpluses will be distributed under the mandate by which we serve, namely, to improve existing facilities, our own and those of allied community radio enterprises in our part of West London and support small-scale DAB development.

The procurement of assets will be funded from director loans – repayable over the early years of the licence term. The assets will be ‘locked’ and held for the benefit of the people of West London. In accordance with our Articles of Association, there will be no dividend of substance payable to the directors or other shareholders.

Carriage customers

Our carriage pricing model puts C-DSPs centre stage. City West Digital will offer subsidised carriage to qualifying C-DSP licensees of circa 50% below our standard DSP carriage rate.

Our pricing structure overall is competitive. Published rate card prices from small-scale radio multiplexes in other cities such as Edinburgh, Glasgow, Cardiff and Leeds, show the cost of reaching one thousand listeners per annum ranging from £11.26 down to £9.31. By comparison City West Digital’s cost per thousand (C.P.T.) will be just £3.76.

We fully accept that the public (rate card) rates of charge from other radio multiplexes cannot be considered a precise measure of the final rates negotiated, but we would suggest that the economies of scale, which lean heavily in our favour, offers City West Digital scope to deliver exceptional value for money to programme service providers.

However, it is important to note that in this case, low costs do not translate into a poor quality service. 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, 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 carefully planned transmission system that will operate within the finest tolerances, thereby delivering a 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 initial financial outlay, it will over time, save the company money. This is why our establishment costs reflect a higher level of CAPEX.

Costs

Considering costs specifically, for this application we have divided these into two:

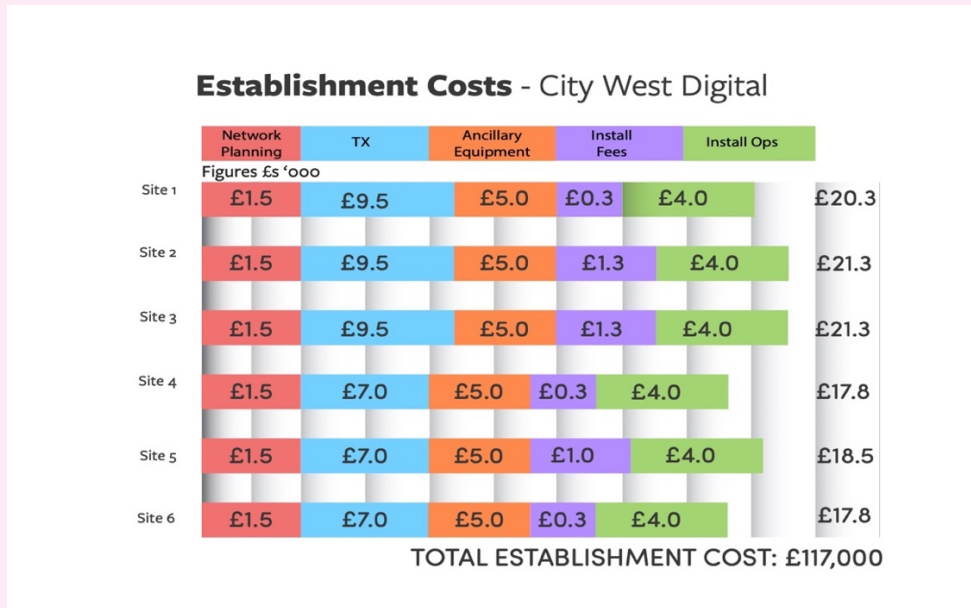
- necessary expenditure to establish the service and
- operating expenditure (excluding borrowing costs) over a given 12-month period.

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 licensing Round 5 and the experience gained from members of our group being participants, or playing key parts, in each of the earlier licensing Rounds, means that 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.

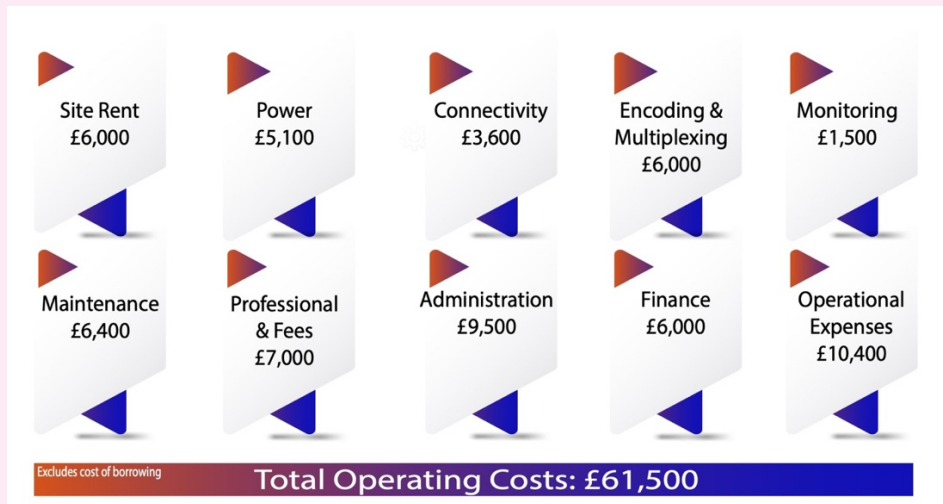
The graphic overleaf demonstrates our Establishment of Service costings

Establishment of Service Costings



In a largely fixed cost operating environment, we have set out the key areas of planned expenditure. These figures, are based on current costs, but in the event of an 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, this being to the detriment of consumers.

The illustration below shows our whole service running costs



Conclusion

City West Digital is a Community Interest Company whose broadcasting assets will be held for the good of the people of West London. Our heavily subsidised C-DSP carriage charges too, reflect our intention to support community radio services seeking to serve audiences in the West London area. This aspect is set alongside carriage income from commercially-led radio services and from this revenue stream we will generate enough income to cover the costs of borrowing necessary to establish the radio multiplex service. Our costings are drawn from first hand experience and reflect a measure of the importance we place on establishing a radio multiplex service network that is well planned, resilient, technically proficient and financially viable.

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)

A primary source and a secondary source of revenue will meet the costs of establishing this service up to the point of launch

Primary source

The amount required (as shown above) is £117,000 plus a working capital surplus of £8,000 making a total of £125,000. Three companies/directors will between them loan the company £96,000 (76.8% of this total). In addition, 3 participating community radio services Desi Radio, Westside Radio and The Beat, will each loan the company £6,000 making a further 14.4% of the total required.

Collectively, our primary source of income equates to 91.2% of the required capital of £125,000 (i.e. £114,000).

Secondary source

An established broadcaster, who as a carriage customer, has signed an agreement with us to pre-pay carriage to the value of £22,000 payable on award of licence.

However, it is worth noting too, that this source of funds is further underpinned by an offer of a holding deposit scheme to service providers. From experience we know that in certain UK cities, of which London is one, supply of small-scale DAB carriage capacity will be outstripped by demand

from radio services wishing to be carried. A carriage deposit scheme would provide our customers with a degree of carriage certainty and deliver City West Digital with an early revenue stream.

We conservatively estimate that in the weeks following award, we would be able to secure, as a matter of routine, in excess of £13,000 in carriage deposits, this figure making up well in excess of the 8.8% funding requirement.

From this we seek to demonstrate that in the event of being awarded the West London radio multiplex licence, we will quickly be able to have in place the funds necessary to establish this service.

Additional financial support

Finally, the directors of City West Digital are committed to establishing this radio multiplex service and in this connection have pledged further funds, if necessary, in order to ensure the completion of this project within the required timeframe.

- 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 (£)
Desi Radio (The Panjabi Centre)	5%	£6,000
The Beat	5%	£6,000
Westside Radio	5%	£6,000
Lawrence Galkoff Associates	27%	£60,000
Ajit S Khera	16%	£24,000
Infocus Digital Media	10%	£12,000
Secondary Income (amount required)	-	£11,000
	TOTAL:	£125,000

Secondary income above is provided by a £22,000 carriage pre-payment agreement payable on award of licence and this element of funding is in turn underpinned by service provider deposits in excess of £13,000.

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

All funding identified above is confirmed and agreed with signed Memoranda of Understanding between City West Digital and each lender.

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.)

Our task force comprising four directors and our technical partner, each proficient in different disciplines, bring together a unique combination of skills relevant to establishing the service within the time frame set, and also operating the radio multiplex service once launched

City West Digital comprises a group of four directors: Lawrence Galkoff, Paul Boon, Ajit Khera and Usha Parmar. The establishment, installation and day to day management of the radio multiplex will be delegated to a team of City West Digital directors and our technical partner - Digris. We call this team our Task Force.

Day-to-day activities of the Task Force

Based on evidence from the small-scale radio multiplex trials, 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 Task Force

To meet this requirement, we highlight below, the skills brought by our four directors and our technical partner who, collectively, will be responsible for overseeing the establishment of the multiplex.

The relevant experience of the City West Digital's Task Force is set out below.

Lawrence Galkoff – City West 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.

Paul Boon – City West Digital Director

Paul is an independent radio specialist. Until 2017, he worked in radio broadcasting policy and regulation where his work programme included a number of 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 a 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 for on-time and under budget SSDAB 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.

Ajit (Jay) Khera – City West Digital Director

Jay is an experienced businessman working initially in the property sector. Today he devotes much of his time as Station Manager/Director at Desi Radio a community radio station that he has been involved with since its early days as an RSL and later as one of the initial group of 15 Access Radio services. Under his stewardship the radio station continues to go from strength to strength.

He has spent over two decades overseeing the day-to-day aspects at Desi Radio and is a director of the station's overarching charity The Panjabi Centre Ltd.

Jay brings procurement skills, administrative oversight and contract compliance expertise to the team.

Rash Mustapha - Digris CTO

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 Leeds, Bradford and Manchester multi-site radio multiplexes.

Usha Parmar – City West 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 Milton Keynes and Derby.

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:

City West Digital, award to operationally live in 12 months

Our Task Force of five will execute our establishment plan. Each specialist in the Task Force brings the essential skillsets to progress matters set out in our plan, resolve issues arising and develop effective solutions in order to keep this multiplex build-out, on track.

To enable this, we have prioritised four overarching activity areas:

- Draw-down capital, on award of licence
- Secure site agreements
- Crystallise the network plan
- Procure equipment

Each agreement in place with our lenders will be enacted and sums of money required – drawn down. During this short period, we will have engaged with our six site owners (three of which are providers of services for the radio multiplex) the others being two local authorities and a hospital trust, each of whom are familiar with dealing with telecoms and communications providers. Based on experience from previous rounds, we have a high level of confidence in securing these sites. Finally, we plan to initiate the procurement of equipment as soon as our network plan is approved.

However, we realise that these activity areas do not stand in isolation and so our high-level Gantt chart lists 26 key activities and aligns these with seven facets as we proceed to establish the multiplex service.

These facets are:

- Company Housekeeping
- Premises/sites
- Masts/TX installation planning
- Potential interference matters (ACI)
- Connectivity/Distribution/Synchronisation
- Customer and Carriage
- Conclusion procedures/compliance

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

Supported by the Gantt chart, submitted as **Annex 1**, the City West Digital plan illustrates those activities, dependent upon predecessor activities being concluded. From this 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 the applicant group City West Digital C.I.C will provide C-DSP services.

Each of these are Ofcom licenced heritage analogue community radio services.

Particularly, City West Digital will provide a digital path to AM community radio station Desi Radio.

Desi Radio

Central to this licence application is Desi Radio. Desi is an AM community radio service. It was one of the first pilot 'Access Radio' licensees and a community radio cornerstone launching back in 2002.

With AM listening in steep decline the future for Desi Radio is understandably precarious. Desi Radio seeks a digital path and currently its service is broadcast on the London trial but this will come to an end when Ofcom awards new licences and Desi seeks carriage on a provider aligned with their coverage area.

In 2020 Ofcom broadened the approved service area for Desi, recognising that many of the station's target listenership have moved further away from its Panjabi centre in

Southall. Desi Radio's approved area is now described as West London centered on Southall.

The cost of AM broadcasting which in itself draws large amounts of electrical power to radiate the analogue signal, continues to rise. The radio station's transmission provider levies charges at a level that are beginning to become unsustainable for this community radio station run by volunteers and overseen by a charity.

Securing carriage as a participant is possibly the only route for Desi Radio safeguard its future.

The Panjabi Centre Ltd (Desi Radio) holds 5% of the company's shareholding. This service intends to apply for a C-DSP licence. Desi Radio is licenced by Ofcom: CR000061BA/3

Westside Radio

Westside Radio (BBA Media) holds 5% of the company's shareholding. This service intends to apply for a C-DSP licence. Westside Radio is licenced by Ofcom: CR000072BA/5

The Beat

The Beat (Bang Media & Entertainment Ltd) holds 5% of the company's shareholding. This service intends to apply for a C-DSP licence. The Beat is licenced by Ofcom: CR000068BA/4

Insanity Radio

Insanity Radio (Royal Holloway University of London) holds 5% of the company's shareholding. This service intends to apply for a C-DSP licence. Insanity Radio is licenced by Ofcom: CR0000217BA/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.

37 services in total, are ready to join City West Digital

The extent of demand or support for the City West Digital proposed service is evidenced primarily by the 28 services who have agreements – signed Memoranda of Understanding (MOU) or signed Heads of Terms (HOT) - signalling that they intend to take carriage on the multiplex. In addition, 9 other proposed service operators have expressed interest.

9 of our fully signed-up services would be C-DSP licenced services.

City West Digital is a community focussed applicant company which has won support and has encouraged participation from community radio services active, specifically, within the West London area. City West Digital has also reached out to other local DSP services and to broadcasters from further afield.

A separate Annex provides evidence.

Name of station and service provider name (if known)	Proposed C-DSP or DSP	Nature of evidence of support provided
Desi Radio – The Panjabi Centre	C-DSP	MOU - participant
Westside Radio – BBA Media	C-DSP	MOU - participant
The Beat – Bang Media & Entertainment	C-DSP	MOU - participant
Insanity Radio – RHUL	C-DSP	Letter – participant
Flex FM – Flex FM Broadcasting	C-DSP	letter
Nomad Radio – Nomads Media CIC	C-DSP	HOT
Smoke Radio – University of Westminster	C-DSP	email
Hospital Radio Hillingdon	C-DSP	email
Asian FX Radio – AFX Media Group	C-DSP	HOT
London Music Radio - London Music Radio Ltd	DSP	HOT
Sunrise Radio – Bradford City Radio Ltd	DSP	HOT

Happy Radio – Happy Radio UK Ltd	DSP	HOT
Mega Radio	DSP	HOT
Cosoro Radio – Cosoro Limited	DSP	HOT
Eirewave – Eirewave Limited	DSP	HOT
Fun Kids – Folder Media Ltd	DSP	HOT
Life Radio UK	DSP	HOT
Gaydio – Gaydio Community Interest Company	DSP	HOT
GreekBeat – GreekBeat Radio Ltd	DSP	HOT
Tomorrowland OWR – Like Media	DSP	HOT
Culture City Radio – African and Caribbean Business Ventures Ltd	DSP	HOT
All Star Youth Radio – All Star Ents Ltd	DSP	HOT
Akash Radio – Akash Radio Leeds	DSP	HOT
MMH – Credible Media Ltd	DSP	HOT
Mom’s Spaghetti – Credible Media Ltd	DSP	HOT
Easy Radio – Thames Radio Ltd	DSP	MOU
Nation 70s – Thames Radio Ltd	DSP	MOU
Nation 90s – Thames Radio Ltd	DSP	MOU
Asian Star	DSP	EOI
Radio Ramadhan	DSP	EOI
Sami Swoi Radio	DSP	EOI
Serenade Radio	C-DSP	EOI
BSJ.FM	C-DSP	EOI
Base FM	DSP	EOI
Groove	DSP	EOI
West London Radio	DSP	EOI
Boom Light	DSP	EOI

Flex FM, Smoke Radio and Hospital Radio Hillingdon will each take carriage on City West Digital in return for provision of transmission sites which will form part of our transmission network.

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 media editorial and advertising, a long-established web presence and proactive campaigns - have led the way we reached out to service providers.

Contact has been made with over 50 radio services.

Our dealings have been open and transparent and are common to all services, while our development of a framework aimed at delivering fairness, has been calculated to ensure fair and effective competition among programme services.

Measures taken prior to Ofcom's advertisement announcement

2018 - 2020

In 2018 West London was home to six analogue community radio services: Desi Radio, Insanity Radio, Westside Radio, Flex FM, Hayes FM and The Beat (Nomad Radio Launched in 2019). As part of Ofcom's 2018 process of inviting Expressions of Interest, Paul Boon, Lawrence Galkoff and Jay Khera, established contact with five of these radio services and subsequently, Desi, Insanity, Westside and Flex agreed to work together as a group and City West Digital CIC was born.

We built our website in January 2020 to raise interest in our project and by February the group had support in writing from most of these community radio services. Anticipating that West London would be part of licensing Round 1 we had identified suitable transmitter sites through our participants and others.

2021 - 2023

We kept our website active because at this stage it was often receiving over 90 hits per month and we felt it important to keep the small-scale DAB message alive. Contact was maintained with Desi, Westside, Insanity and Flex with updates and through sharing information about SSDAB and licensing matters in general.

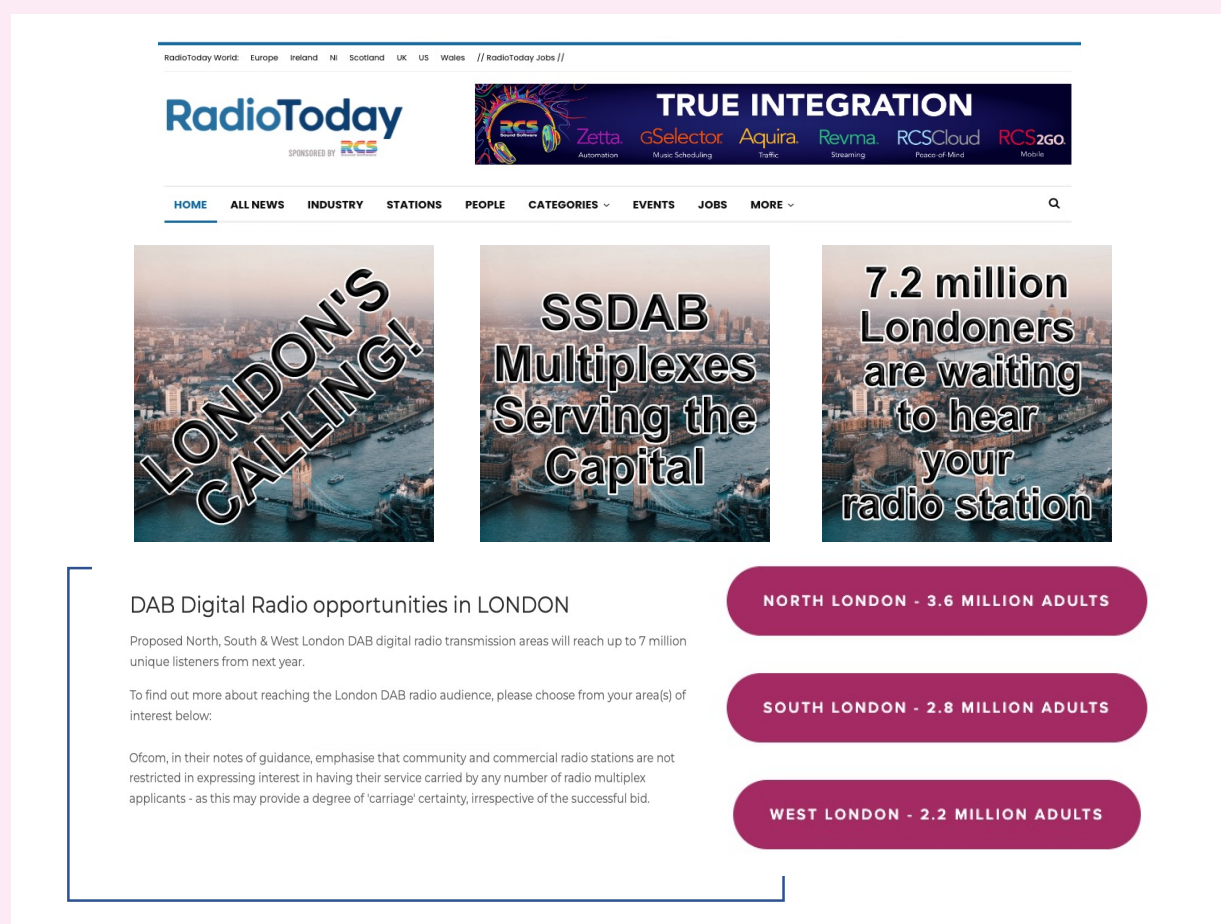
In December 2022 we invited The Beat to become participants in our company and they accepted.

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

The day following Ofcom's licensing Round 5 announcement, we placed an advertisement in Radio Today and also received editorial coverage.

Our advertising campaign was shared with applicants for two neighbouring radio multiplex advertisement areas (North London and South London). These advertisements, our call to action, 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 for each week of Ofcom's 12-week licence application window, thus allowing potential service providers more than adequate time to respond.



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

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TRUE INTEGRATION
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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:

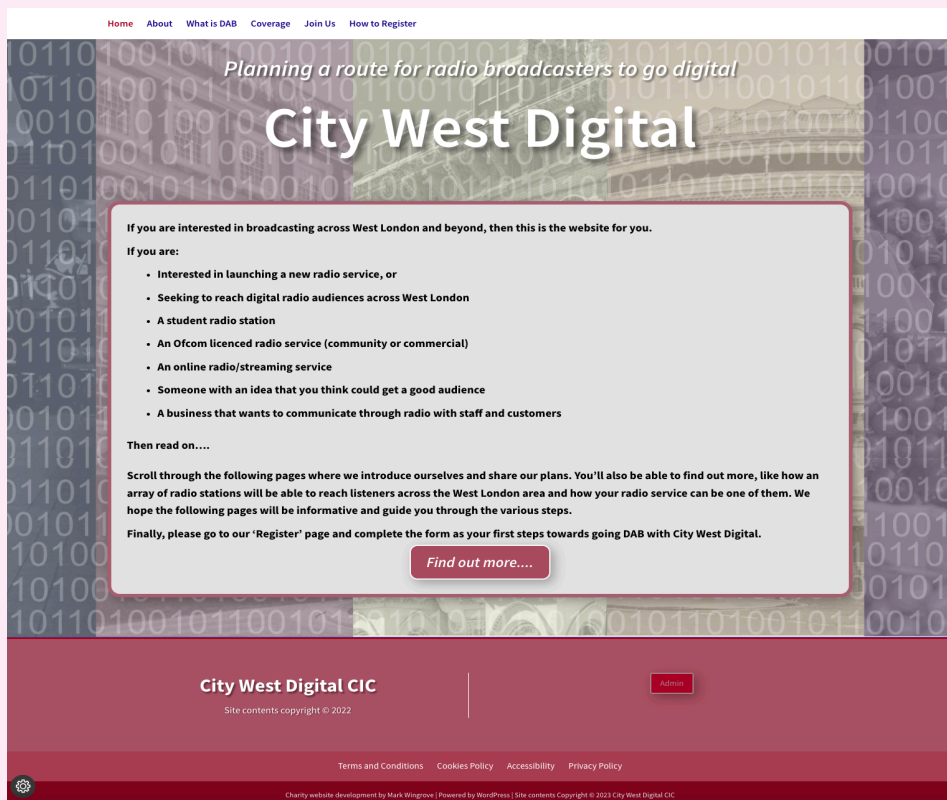
Ofcom, in their notes of guidance, emphasise that community and commercial radio stations are not restricted in expressing interest in having their service carried by any number of radio multiplex applicants - as this may provide a degree of 'carriage' certainty, irrespective of the successful bid.

NORTH LONDON - 3.6 MILLION ADULTS

SOUTH LONDON - 2.8 MILLION ADULTS

WEST LONDON - 2.2 MILLION ADULTS

Respondents selecting the West London button were taken to the City West Digital website (see overleaf).



In the period immediately following this promotional activity user visits to our website increased by 250%.

Other radio services

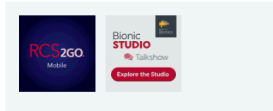
We were pleased to receive a positive response from Nomad Radio based in Hammersmith and they signed Head of Terms to take C-DSP carriage on City West Digital in May of this year.

The remaining analogue community radio service, Hayes FM, was approached on a number of occasions back in 2018 and also between the end of 2022 and early 2023, but they have chosen not to engage with members of the City West Digital team.

Online radio services, who would qualify for a C-DSP licence were also approached and we are pleased to carry Smoke Radio a student radio service from the University of Westminster and also Hospital Radio Hillingdon based in Uxbridge. We have reached agreement with these radio services through their 'parent/associated' organisations both of which will provide City West Digital with locations to house our relay transmitters.

London DAB bidders announce plans to apply for multiplexes

Written By Roy Martin — updated on April 6, 2023 – 8:07 pm



Today's radio news

- Tyler West announces 24 Hour KISSSTORY Rave for Cash for Kids
April 8, 2023 – 12:02 pm
- Tributes paid to BBC Radio Wales presenter Nicola Heywood-Thomas
April 7, 2023 – 2:15 pm
- LBC political editor Theo Usherwood takes a break from Global role
April 8, 2023 – 4:48 pm

City West Digital

City West Digital is a collective of local community radio services brought together by a small team led by Paul Boon, who is part of the successful Manchester licence award.

“In West London, we were ready to go, back in 2020, but the pandemic came along” said Paul. “Later that year Ofcom re-prioritised where the London round of licence advertisements should be slotted in. ”

“We have used this time well, our website dabradio.london has been live all this time and our supporting community radio stations who were our associates back in 2020, have become our friends.”

Details of any other applications can be sent to news@radiotoday.co.uk for inclusion in an article.

Above, editorial coverage on City West Digital, published on the Radio Today website in early April.

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

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. An important additional 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 and do not intend to contract out the sale of capacity to a third party.

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

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

In summary, City West Digital can be seen to have developed a rigorous framework with defined areas of activity. This framework 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 programme services on the City West Digital – West London small-scale DAB radio multiplex.

City West Digital

Application in numbers

Adult population coverage	91%	within advertised area
Overlap with local radio multiplex service	22.6%	below the LRMS 40% limit
Overspill outside the advertised area	9.9%	of advertised area
Business plan launch expenditure	£117,000	to establish the service
Technical plan with	6	sites
Digris technical partner	11 years experience	DAB specialist
Average cost per transmitter	£8,250	per site
Total install average cost	£19,500	per site
Timetable - operationally live	12	months
Task Force	5 members	with 170 years community and/or commercial radio sector experience
Community radio participants	4	
C-DSP participants voting power	20%	in applicant Community Interest Company
Demand or support	11	total number of C-DSPs
Demand or support	37	established radio services
Contract or offer to contract with over	51	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:

PAUL BOON

Date of application:

27 JUNE 2023

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

Company director