

---

## Small-scale radio multiplex licence

### Application form – Part A (public)

---

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

ExeDab Ltd

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

East Devon

**APPLICATION FORM:**

Publication date: 30 March 2023

# Contents

---

## Section

1. Overview	2
2. Extent of proposed coverage area	6
3. Ability to establish the proposed service	8
4. Involvement of C-DSP providers; demand or support from programme providers	18
5. Fair and effective competition	20
6. Declaration	21

# 1. Overview

## The purpose of this form

- 1.1 You should complete this form if you are applying for a licence to provide a small-scale radio multiplex service (a ‘small-scale radio multiplex licence’). A small-scale radio multiplex service is the means by which DAB digital radio stations (‘digital sound programme services’) are broadcast, and can transmit around ten stereo digital sound programme services (or a significantly higher number if the DAB+ standard is utilised). The application form is divided into two parts – **Part A** (which we will publish on our website) and **Part B** (which will be kept confidential). This document constitutes Part A; [Part B of the application form](#) is available separately.
- 1.2 Small-scale radio multiplex licences are awarded by Ofcom in a competitive process. Applications are judged against specified criteria, and Ofcom awards the licence to the applicant which it considers best meets the criteria.

## How to complete the form

- 1.3 There are detailed instructions on how to complete this form, and information on the next steps in the application process, in our [guidance notes](#) for licence applicants and licensees. Please read this guidance and the frequently asked questions carefully before completing this form.
- 1.4 If you still have a query having read the guidance and FAQ, you can contact Ofcom’s Broadcast Licensing team by email ([smallscaledab@ofcom.org.uk](mailto:smallscaledab@ofcom.org.uk)). The team cannot provide advice or pre-approve applications but can answer general questions.
- 1.5 Please download this form and fill it in on a computer. If completing by hand, please use block capitals and black ink.
- 1.6 Please answer all the questions as fully as possible, use extra sheets if required and provide the supporting documentation listed at Section 7 of Part B of the application form. Sufficient information must be supplied about the applicant and the proposed service to enable Ofcom to consider the application in accordance with the statutory criteria for the granting of small-scale radio multiplex licences. Ofcom may need to request further details from you before a licence can be granted.
- 1.7 Ofcom reserves the right to reject applications made using an old version of the form.
- 1.8 Ofcom will accept handwritten application forms, but they must be filled in using block capitals and black ink.
- 1.9 Ofcom reserves the right to reject application forms that are illegible.
- 1.10 You must answer all questions in the application form and respond “N/A” to any questions that do not apply to the applicant.
- 1.11 Ofcom reserves the right to reject applications which do not meet the following criteria:

- a) The declarations in Section 6 of this form and in Section 8 of Part B of the application form must both be signed and dated.
  - b) The person who signs and makes the declaration on behalf of the applicant must be:
    - i) A director of the company or the company secretary where the applicant is a company.
    - ii) A designated member where the applicant is a Limited Liability Partnership.
  - c) All supporting documents as requested in the checklist at Section 7 of Part B of the application form must be supplied in legible form and translated into English where applicable.
- 1.12 If you are completing the form as an agent, i.e. you are acting on the applicant's behalf, please note that you cannot sign it on your client's behalf, and that the person signing the form needs to have personally checked the truth and completeness of the responses given. If your client wishes you to be Ofcom's main contact in relation to the application, please make this clear in an accompanying letter, and provide evidence of your authority to act on behalf of the applicant. The form should be filled in so as to include information about the applicant, not the agent. If Ofcom has further questions once the application has been submitted, we will direct these to the applicant, not to the agent, but we will accept responses from the agent.

## How to submit the form

- 1.13 We prefer application forms and required supporting documents to be submitted by email to [smallscaledab@ofcom.org.uk](mailto:smallscaledab@ofcom.org.uk). Handwritten applications and required supporting documents should be scanned and attached to the email.
- 1.14 You should receive a response from [smallscaledab@ofcom.org.uk](mailto:smallscaledab@ofcom.org.uk) confirming that your application has been received by Ofcom. If you do not receive a response, it is likely your application has not been received and you should contact Ofcom's Contact Centre on 0300 123 3333 and ask to leave a message for the Broadcast Licensing team, who will respond to your message as soon as possible.
- 1.15 If the applicant cannot submit the application form and/or the supporting documentation by email, the applicant may submit the application and/or the supporting documentation by post to:
- Ofcom  
Broadcast Licensing  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA
- 1.16 Those applicants who submit their application by post will be sent an acknowledgement.

## Application fee

- 1.17 A non-refundable application fee of £500 is payable by bank transfer.
- 1.18 Applications will not be assessed until the application fee has been received in Ofcom's bank account.
- 1.19 Ofcom requests that applicants pay the application fee by bank transfer and that immediately after the applicant has instructed their bank to make the payment, confirmation of payment is emailed to [ofcom.remittances@ofcom.org.uk](mailto:ofcom.remittances@ofcom.org.uk).
- 1.20 To ensure that Ofcom can identify the payment, it must include a payment reference which is the applicant's postcode followed by the applicant's name (or as much of the name as is possible to provide within the character limit set by the bank) as provided in response to question 3.1 of this application.
- 1.21 The bank details to be used to pay the application fee are:
- Account Name: Office of Communications
- Bank details: Lloyds Bank, 69-73 Borough High Street, London SE1 1NQ
- Account number: 00782415
- Sort code: 30-97-90
- BIC: LOYDGB21351
- IBAN: GB05 LOYD 3097 9000 7824 15
- SWIFT: LOYD GB 2L

## Supporting documentation

- 1.22 You must provide a range of supporting documentation when submitting this application form. Please refer to the checklist at Section 7 of Part B of the application form for full details. Please note that failure to supply the necessary documents will delay your application.
- 1.23 Ofcom reserves the right to reject applications with which the necessary documents are not supplied in legible form.
- 1.24 Please note that Ofcom cannot receive emails larger than 35MB. If your application email exceeds this limit, please send your supporting documents in a separate email(s), clearly indicating the applicant's name in the subject line of the email.

## Provision of information

- 1.25 Ofcom requires complete and accurate information to assess applications. In particular, we must be satisfied that those applying for a licence are 'fit and proper' to hold a licence and are not disqualified from participation in a licence.

- 1.26 It is an offence under the Broadcasting Act 1996 (as amended) to provide false information or withhold relevant information during the application process, and may be grounds for revocation of a licence subsequently granted.

## Publication of applications

- 1.27 Part A of the application form (i.e. this document) will be published by Ofcom on our website as soon as practicable following the closing-date for applications. Because this is the 'public' part of the application form, and Ofcom is legally required to publish applications for public comments, no questions should be answered by means of the submission of a confidential annex. Part B of the application form will remain confidential.
- 1.28 Ofcom may take into account any comments received from the public, which can be made to it with respect to Part A of the application submitted.
- 1.29 In submitting Part A of the application, you agree that Ofcom may publish contact details for the licensee, which may include personal data, on the Ofcom website and/or in other relevant publications.
- 1.30 When a licence is granted, the name of the service and public contact details for the licensee will be published on the Ofcom website. These are the details supplied by the applicant in the application form. If you have any questions about the information that we publish, or there are any changes to this information, you should contact the team by email ([smallscaledab@ofcom.org.uk](mailto:smallscaledab@ofcom.org.uk)).
- 1.31 Ofcom considers issued small-scale radio multiplex licences to be public documents and copies of licences will be made available to third parties on request, noting that personal data apart from the name of the licensee may be redacted.

## Data protection

- 1.32 We require the information requested in this form in order to carry out our licensing duties under the Broadcasting Act 1990, Broadcasting Act 1996 and Communications Act 2003. Please see Ofcom's [General Privacy Statement](#) for more information about how we handle your personal information and your corresponding rights.

## Keeping up to date with broadcasting matters

- 1.33 We strongly recommend that you subscribe to receive Ofcom's regular email updates on broadcasting matters. These include a [monthly radio licensing update](#) that lists new services licensed, licences revoked, licence transfers, and changes to licensed services during the past month. To subscribe to these updates, please visit [www.ofcom.org.uk/email-updates](http://www.ofcom.org.uk/email-updates) and select 'Broadcasting'.

## 2. Extent of proposed coverage area

### About this section

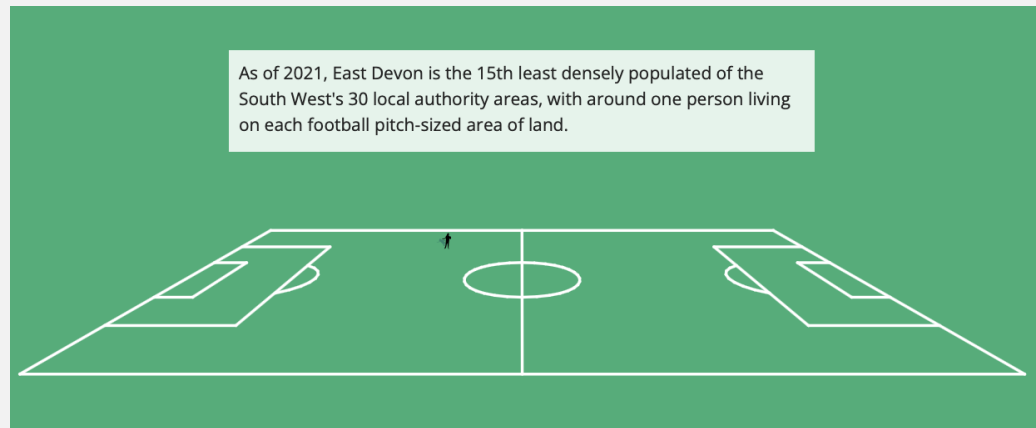
Under section 51(2)(a) of the 1996 Act, we are required to consider the extent of the coverage area an applicant proposes to achieve within the area which has been advertised. This section therefore asks you to describe the coverage you are proposing to achieve. Further questions on the detailed technical arrangements for the proposed service, including questions on the transmission site(s) that you intend to use and your plans for how the multiplexing and distribution of your service will be arranged are contained in Part B of the application form.

Before completing this section of the form, you should read carefully the notes on 'Extent of proposed coverage area' in Section 4 of Ofcom's [guidance notes for licence applicants and licensees](#).

Applicants should note there are confidential questions relating to extent of coverage area in Part B of the application form.

- 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):

East Devon is a rural polygon of 1,449 square kilometres, and a 2011 population of 136,187 adults, given a population density of just 94 people per square kilometre – or about one per every football-pitch area, as the Office for National Statistics illustrates, below. A polygon without a city, East Devon's settlements are sparsely located and modest in size. Only two, Honiton and Sidmouth, have more than 7,500 residents.



(Source: ONS, UK Census 2021)

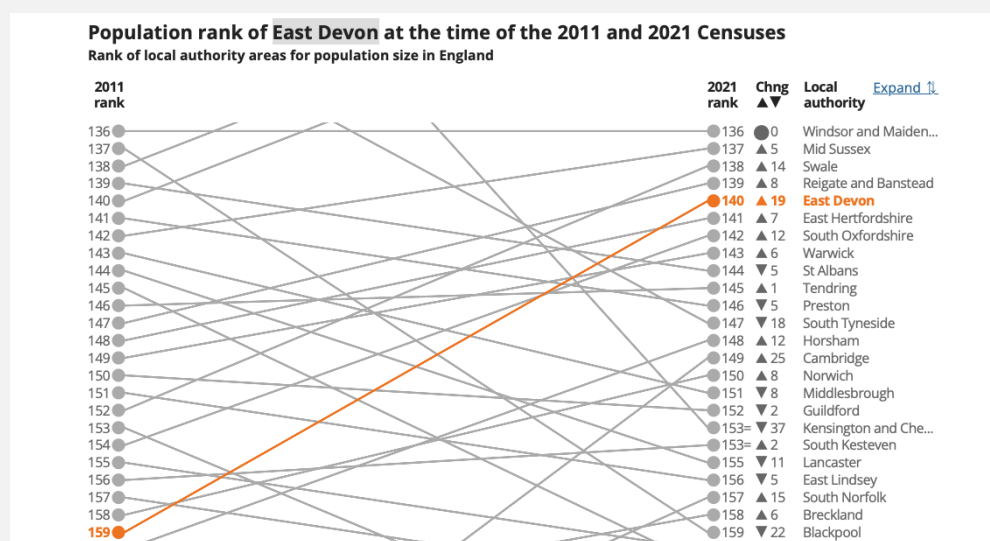
This presents significant hurdles in building a small-scale DAB transmitter network that will cover a significant area satisfactorily and which will be financially sustainable. Total coverage will require a high number of transmitters, leading to both high capital and operational costs, and consequently making carriage fees unattractive to commercial broadcasters compared to multiplexes elsewhere that reach large populations in relatively compact areas. Furthermore, until our participant Sid Valley Radio obtained its C-DSP licence in July, the polygon contained no existing Ofcom-licensed community radio stations at all. As demand from broadcasters on this polygon is, in our opinion, likely to be small, we have built our transmission proposals on the following principles:

- Providing coverage for the two largest towns, Sidmouth and Honiton
- Covering a meaningful population within the polygon with a maximum of three transmitters to ensure a sustainable, long-term financial model
- Avoiding overlapping, wasteful coverage with the Exeter multiplex already served by a transmission site at Cranbrook, a fast-growing new town in the East Devon polygon.
- As both Sidmouth and Honiton look towards Exeter for work, leisure, cultural and much tertiary education, providing good coverage on roads connecting these settlements with the neighbouring Exeter multiplex.
- Providing continuous outdoor coverage within the polygon as far as practicable.
- Minimising overspill into the proposed Exmouth/Dawlish polygon, to preserve the integrity of Ofcom's published plans.
- Making the service affordable to community services, small commercial stations and new entrants



At 13.6 per cent, population growth of East Devon between the 2011 and 2021 Censuses is one of the largest in the UK and more than twice the national average, moving it up 19 places in local authority sizes (see table, below). However, much of East Devon's growth is to the west of the district, around Cranbrook.

ExeDab's existing transmitter site in the East Devon polygon at Cranbrook Education campus serves this town, which is set to have around 20,000 residents by 2030. Land for a second new town has also been identified to the south west of Cranbrook, which will also be covered by the existing Exeter multiplex. As growth is in an area already covered by ExeDab – which overlaps with the East Devon polygon - we believe listeners are best served by the East Devon multiplex operator concentrating resources in the two largest existing settlements in the polygon.



(Source: ONS)

Our chosen locations therefore provide coverage in a south-west to north-east plane across the polygon that are contiguous with the Exeter multiplex, whilst minimising overlap. East Devon District Council's 2022 strategy document *"The role and future of settlements"* outlines how Sidmouth and Honiton have high levels of commuting into Exeter, with a total net outflow from East Devon to Exeter of 11,420 residents....[and] one in five residents of Honiton work in Exeter, far higher than other places outside East Devon." Serving Honiton, therefore, should be an essential requisite of any rational and sustainable plan for this multiplex.

Should ExeDab be awarded this licence, stations choosing to broadcast across both Exeter and East Devon will be able to enjoy affordable seamless transmission between the networks, with listeners benefitting from continuous coverage as they commute. In this area, according to council data, 54 per cent of people travel by car, and 11 per cent by public transport regularly. ExeDab's client stations can be with them on their journeys.

On the downside, and with regret, at this stage our transmission plan leaves the many disperse towns and villages of this very rural polygon unserved, but we believe this to be a price that must be paid in building a sustainable network. We have identified other sites that will cover some settlements, and connecting hinterland, but will not be promising to contract with landlords or build other parts of the network within 18 months of any licence award.

Finally, to avoid compromising the integrity of the proposed Exmouth/Dawlish polygon, we have avoided transmitter locations to the western fringe of the polygon, as we deemed overspill into the Exmouth/Dawlish area could have been considerable and could prove troubling to future applicants for that polygon.

- 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)
Sidmouth	SY130 893	13	Non-directional	New	200
Woodbury Common	SY 070865	20	Non-directional	New	400
Honiton	ST 142018	13	Non-directional	New	200

- 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).

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

A full coverage prediction map for the whole of the transmitter network at the 63 dB $\mu$ V/m field strength is shown below. Additionally, Appendix G shows the 54 dB $\mu$ V/m and 38dB $\mu$ V/m contours. The ward-level population tables (2011 Census) indicate that at 63 dB $\mu$ V/m field strength;

- the number of people falling outside the polygon does not exceed 30 per cent of the total population within the advertised licence area; and
- the proposed coverage does not overlap more than 40 per cent of the population within the relevant local radio multiplex service's licensed area.

The transmitter network has been designed to minimise any significant interference above 38 dB $\mu$ V/m to other proposed small-scale DAB licence areas.



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.	ATDI HTZ Communications v22 6.9 x64
Detail the terrain model used by the software and its resolution.	DTM: Ordnance Survey terrain data – 50 metre resolution (DSM+DTM)
Detail the ground cover (clutter) data used by the software and its resolution.	Infoterra clutter data to 50m resolution
What propagation algorithm has been used?	Model pre-set – Fresnel <ul style="list-style-type: none"> <li>• Diffraction geometry – Deygout 94-2</li> <li>• Subpath attenuation – coarse integration</li> <li>• FZ fraction 0.8</li> <li>• Earth radius (sea and land) - 8,500km</li> </ul>
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.	Ofcom-provided population data has been used along with that from the 2011 Census which is included within ATDI's modelling software
Have your predictions been generated by a commercial organisation? If so, by whom?	Coverage predictions have been generated by Viamux using HTZ Communications software from ATDI.

## 3. Ability to establish the proposed service

### About this section

In Section 3, we are asking questions about the applicant company, its financial and business plan, the relevant expertise and experience of those who will be involved in providing the small-scale radio multiplex service, and the timetable for coverage roll-out. The answers to these questions will enable Ofcom to assess the application under section 51(2)(c) of the 1996 Act. Additional information is requested in Part B of the application form.

In the first part of this section we are asking for details of the applicant's officers (directors or, in the case of LLPs, designated members), its shareholders and participants. Where applicable, we are also asking for details of the officers of the applicant's parent and associated companies or LLPs etc.

If any of the individuals named in your responses are known by more than one name/version of their name, all names must be provided.

Certain persons are disqualified from holding a small-scale radio multiplex licence. This section asks the questions which enable us to consider this for those types of disqualification which apply specifically to bodies corporate. It also asks questions which are relevant to our assessment of the applicant's fitness and properness to hold a small-scale radio multiplex licence.

The response boxes and tables should be expanded or repeated where necessary, or provided in a separate annex.

'Officerships' in this section refers to: directorships of bodies corporate, designated memberships of LLPs, or membership of a governing body of an unincorporated association (including partnerships).

The remaining questions in Section 3 relate to the applicant's financial and business plan, the expertise and experience of those involved, and the planned timetable for launching the proposed multiplex service.

Applicants should note there are confidential questions relating to extent of coverage area in Part B of the application form.

### Applicant's details

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

ExeDab Ltd

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

12892684

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:

1 Oak Tree Place, Manaton Close, Exeter, Devon, EX8 2HT

- 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
Paul Nero	1 Oak Tree Place, Manaton Close, Exeter, Devon, EX2 8WA	UK	Director: Exe Broadcasting Limited; Radio Exe Ltd; Exe Communicate Limited; Plain Text Limited; 35/37 Hamilton Road Management Company (2002) Limited; Beehive Cranford Management Company Limited; Exeter Chamber of Commerce (1992) Limited; TorDab Ltd; PlymDab Ltd (multiplex operators)	Current employment: Managing Director, Radio Exe
Dr. David Anthony Treharne	1 Oak Tree Place, Manaton Close, Exeter, Devon, EX2 8WA	UK	None	None
Ashley Rex Jeary	1 Oak Tree Place, Manaton Close, Exeter, Devon, EX2 8WA	UK	TorDab Ltd, PlymDab Ltd (multiplex operators)	Current employment: Programme Manager: Radio Exe

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

## 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
Exe Broadcasting Ltd	24	24	24	24
Exe Communicate Ltd	31	31	31	31
Exeter Community Radio Ltd	14	14	14	14
Ashley Jeary	12	12	12	12
Riviera FM Ltd	9	9	9	9
Lisa England	5	5	5	5
Sid Valley Radio	5	5	5	5
<b>Comments</b>				

## 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	N/A	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)
Exe Broadcasting Limited	1 Oak Tree Place, Manaton Close, Exeter, Devon, United Kingdom, EX2 8WA	Radio Exe Ltd
Exe Communicate Limited	1 Oak Tree Place, Manaton Close, Exeter, Devon, United Kingdom, EX2 8WA	
Paul Nero	1 Oak Tree Place, Manaton Close, Exeter, Devon, United Kingdom, EX2 8WA	Exe Broadcasting Ltd Exe Communicate Ltd ExeDab Ltd

- 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
Paul Nero	Radio Exe; Exe Broadcasting; Exe Communicate; Plain Text; Exeter Chamber of Commerce (1992) Ltd; Beehive Cranford Management Company; 35/37 Hamilton Road Management Company; TorDab; PlymDab

- 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
Exe Broadcasting Limited	Radio Exe Ltd

- 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	Exe Communicate Ltd			
Full name of participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Paul Nero	100	£100	100	100

Name of body corporate identified in response to question 3.8	Exe Broadcasting Ltd			
Full name of participant	Number of shares	Total investment (£s)	Total investment (%)	% of voting rights
Paul Nero	319	£319	51	51
Rex Roazario OBE	306	£306	49	49
Comments				
By virtue of his controlling share in Exe Broadcasting, combined with his control of Exe Communicate - the two companies which hold a combine stake of 55 per cent in ExeDab Ltd - Paul Nero is the controlling shareholder of the applicant.				

## 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; <sup>2</sup>	No	
An individual who is an officer of a body falling within (b) or (c);	No	
A body corporate which is an associate (as defined in paragraphs 1(1) and 1(1A) of Part I of Schedule 2 to the Broadcasting Act 1990) of a body falling within (b) or (c);	No	
An advertising agency or an associate of an advertising agency	No	

## 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):

<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.

- a) Is the applicant a current licensee of Ofcom?

**Yes. ExeDab holds the small-scale DAB licence for Exeter.**

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

**No, other than the existing Exeter small-scale multiplex licence.**

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

**Yes, as outlined in the answer to question 3.14, below.**

- 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”)?

**Yes: Paul Nero is the owner of Exe Communicate, and is the controlling shareholder in Exe Broadcasting Ltd, the parent company of Radio Exe, which holds FM and DSP licenses.**

- f) Has the applicant – or any person(s) controlling the applicant - made any other application to Ofcom (or its predecessor broadcast regulators – the Independent Television Commission and the Radio Authority) for any licence which has since been surrendered by the licensee or revoked by Ofcom (or one of its predecessor regulators)?

**No**

- g) Has the applicant – or any person(s) controlling the applicant - made any other application to Ofcom (or its predecessor broadcast regulators – the Independent Television Commission and the Radio Authority) for any licence which has since been surrendered by the licensee or revoked by Ofcom (or one of its predecessor regulators)?

**No**

- h) Is the applicant – or any person(s) controlling the applicant – subject to any current or pending investigation by any statutory regulatory or government body in the United Kingdom or abroad in respect of any broadcast-related matter?

**No**

- i) Has the applicant – or any person(s) controlling the applicant – ever been subject to a statutory sanction for contravening a condition of a broadcasting licence in the UK or any other jurisdiction?

**No**

- 3.14 If the response to any of the questions (a) to (i) in 3.13 above is 'yes', please provide the details, expanding the table where necessary:

	Licence number(s) (if known)	Details
(a)	AL000318BA/3	Radio Exe
(b)	DP101968BA/1	Radio Exe DSP
(c)	CR000118BA/2	Phonic FM
(d)	CDP103984BA/1	Phonic DSP
(e)	CR102117	Riviera FM
(f)	CDP105370BA/1	Sid Valley Radio (newly awarded to coincide with this application)
(g)	DP101897BA	Zest
(h)	DS103895	ExeDab
(i)	DS104812	TorDab
(j)	DS104824	PlymDab

- 3.15 Please provide any further information you hold, relating to the past conduct of the applicant or those individuals listed, in regulatory matters or in matters going to honesty and/or compliance, which may be relevant to Ofcom's consideration of whether or not the applicant is fit and proper to hold a broadcast licence. If the applicant or the form signatory fails without reasonable excuse at this point to declare any matter of which Ofcom subsequently becomes aware, and which we consider to be relevant to the applicant's eligibility to hold a licence, we will take it into account in determining the question of whether the applicant/licensee remains fit and proper to hold a licence.

If you have no information to provide, please respond "N/A".

N/A

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

**No**

If yes, please provide the following details:

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

## Financial and business plan

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

A detailed financial forecast in Appendix A sets out establishment costs of £45,000, annual income & expenditure with 36-month cash flow and profit & loss forecast. The financial structure ensures we are not over-capitalised and that the amount invested in the multiplex is not significantly higher than the real value of our assets; that earnings represent a fair return on capital employed and avoids a situation where capital is either idle or invested in assets that are not fully utilised.

ExeDab has already launched a three-transmitter SFN for the Exeter multiplex, while our participants, Exe Communicate and Phonic FM, are also partners in the Plymouth multiplex, PlymDab, a two-site SFN. We are therefore well-aware of, and experienced in, the issues and risks in operating multi-site solutions, particularly in rural areas in which the number of services joining the network may be limited.

As an existing SsDab multiplex licensee, we also have cash in hand from existing operations, and our business plan is predicated on the East Devon multiplex benefiting from the economies of scale of holding two contiguous licences. This is possible as the combined area is projected to overlap with the Arqiva/Now Digital local DAB network by around 24 per cent, well within the 40 per cent allowed under the guidelines.

### **Capital Investment – £45,000**

The main capital investment is the multiplexing & transmission system. Our technology partner Viamux will provide the small-scale DAB solution as well as professional services (project management, site surveys, network design and build, software configuration, installation, training and ongoing support).

### **Operating Costs – £12,000 per annum**

#### Administration

Managing relationships with landlords, technology providers and prospective and actual radio service clients is time-intensive, and we will be able to share resources and expertise of the Radio Exe team to which two other existing multiplexes, TorDab and PlyDab, in addition to ExeDab, outsource day-to-day management of their small-scale DAB operations.

The usual administration costs associated with operating a company of this size are included (insurance, legal and accountancy services – once again shared with the Exeter licence area) as is the annual Ofcom licence fee (which isn't). We will have proportionately lower insurance and IT expenditure, and a single set of management and statutory accounts, with costs already covered by ExeDab's existing fees.

### Transmission

The ongoing costs associated with transmission (site rental, electrical power consumption, internet provision) are the single largest recurring operating expenditure. For this reason, we have carefully selected sites for which we have been able to negotiate negligible rents, meaning transmission costs remain low. This is critical for ensuring long-term sustainability in a rural polygon such as East Devon.

### Technical Support & Maintenance

Ongoing technical support for maintaining the multiplex and transmission equipment will be provided by Viamux, by way of an annual support & maintenance contract.

### Small-Scale DAB Management Software

We will extend our Exeter multiplex subscription to Optimux to cover the East Devon polygon. This cloud-based control panel simplifies management and monitoring of a small-scale DAB network. For a modest monthly fee, Optimux allows us to implement cloud encoding - making it quick, easy and cheap to add new services to the multiplex. It also provides us with full invoicing and direct debit collection to streamline payments of carriage fees. Optimux also monitors the multiplex and will alert us to any issues.

### Funding

Capex is funded through shareholders' loans. Operational expenditure will be sustained by providing existing community and commercial broadcasters, as well as new entrants, with a reliable digital broadcast platform on affordable and flexible terms.

- 3.18 Please indicate how the costs outlined in 3.17 (above) will be met, under the following headings:
- a) Share capital – **ExeDab is capitalised at £100.**
  - b) Loan stock **Loans for capital expenditure and working capital will be provided by the shareholders. New loan stock of £45,000 will be injected if our application is successful, at zero interest. We anticipate this loan being repaid within the term of the licence. Further funding is available, if required.**
  - c) Leasing/HP facilities (capital value) – **There is no requirement for such funding**
  - d) Bank overdraft – **there is no requirement for an overdraft**
  - e) Grants and donations – **there is no requirement for grants or donations**
  - f) Other (please specify) – **None**
- 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 (£)
Exe Communicate Ltd	31	£16,500
Exe Broadcasting Ltd	24	£12,000
Exeter Community Radio Ltd	14	£7,000
Sid Valley Radio Ltd	5	£2,500
ExeDab Ltd	-	£7,000

- 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 is confirmed

## 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.)

### General Management

Day-to-day running of the multiplex operation - managing commercial, financial and operational matters – is outsourced to Radio Exe, which has the expertise, team and resources to support the multiplex, lowering operational costs to ExeDab. Technology support is outsourced to Viamux.

Tasks for ExeDab's internal management include, but are not limited to:

- Recruiting new services
- Relationship management
- Issuing carriage agreements
- Invoice management
- Payment collection
- Working with programme services to ensure DSPS and regulatory licence compliance.
- Monitoring and Ofcom reporting
- Promoting the multiplex and the benefits for service providers and listeners

ExeDab will also be responsible for IT, administration, legal, customer service and technical support.

### Team

The participants share a track record of successfully establishing and operating broadcasting operations, including the Exeter multiplex, which launched in 2022. This was in challenging circumstances through the covid period and the subsequent economic turbulence, which included a dramatic rise in energy costs and therefore operational costs for multiplexes.

At the time of writing, ExeDab carries 10 stations. Members of the team also launched the Plymouth multiplex, and consulted on the launch of the Torbay multiplex. All three multiplexes benefit from a shared technology partner in Viamux, and outsourcing of day-to-day management and operations to Radio Exe.

The key people behind ExeDab are as follows:

**Dr David Treharne**, ExeDab's chair, was instrumental in launching and then operating Phonic FM, Exeter's community radio station, which he now chairs. He presents a jazz show on the station, having hosted similar shows on Exeter's former commercial stations DevonAir and Gemini, as well as Jazz FM. David served as chair of Exeter City Football Club for three years and amongst his academic publications are two volumes on the club specifically and community ownership of football clubs in general. With important chairmanships in Exeter over many years, David has extensive contacts across both city and county.

**Paul Nero**, managing director of Radio Exe, will have overall responsibility for launching and managing the new service for East Devon, the district where he lives. Since ExeDab launched, Paul has brought four new digital radio stations to air, including an all-speech station, Devoncast Radio, a unique service featuring sport, local politics, and general interest programming, with regular news for Devon from Radio Exe. The forthcoming 10TenDevon is a rolling 10-minute daily news service. Additionally, he has editorial responsibility for the BBC's local democracy reporting service in Devon, for which Radio Exe holds the BBC contract and employs three journalists. No other mainland commercial radio station operates such a prestigious contract to provide public service content to other local media partners, including community radio stations in Devon and the BBC itself.



With a broad media background including at the BBC, Financial Times and in ITV, Paul is now a director of Exeter Chamber of Commerce, which is in the process of merging with Devon and Plymouth Chamber, to provide a powerful voice for businesses across the county and he is on the board of the new Devon Chamber. Consequently he is well-connected with businesses, local authorities and audiences. Paul serves on the advisory panel of commercial radio industry body RadioCentre and is chair of the Devon and Cornwall branch of the Radio Academy. The author of five books, he is a member of the British Academy of Film and Television Arts (Bafta) and holds a first degree from the University of Exeter and an MBA from Bristol Business School.

**Ashley Jeary** is Radio Exe's programme manager and twice winner of a Radio Academy's 30-under-30 award. A director of ExeDab, he began his broadcasting career at Heart in Exeter. In addition to his management responsibilities at Radio Exe, he presents the station's drivetime show and is responsible for developing new broadcasting talent. Ashley has a deep understanding of the broadcast market in Devon, compliance and technology issues, and is a director of two other small-scale DAB multiplexes, in addition to ExeDab.


**Brad Hardware** of Radio Exe is responsible for the day-to-day running of ExeDab's Exeter multiplex, as well as the Plymouth and Torbay multiplexes. Brad manages client relationships, including contracts; interactions with landlords of transmitter locations; and the relationship with our technology providers Viamux and Optimux. As a broadcast journalist, Brad is also station manager for Devoncast Radio, the speech station from Radio Exe which he has developed from nascent idea to on-air station on three digital multiplexes. Brad lives in East Devon.

#### Technical Partners

The ExeDab team is supported by [Viamux](#) and [Optimux](#) – who are already our technology partners in the neighbouring Exeter polygon. Viamux services include multiplex network design & build, installation, support and maintenance.

ExeDab uses Optimux, the market-leading small-scale platform developed specifically to simplify day-to-day management of small-scale DAB multiplexes. It employs an easy-to-use dashboard for managing, monitoring and reporting on all aspects of their multiplex as well as providing invoicing and direct debit collection to simplify the payment of carriage fees. Every aspect of the day-to-day management of a small-scale multiplex has been incorporated into Optimux.

- 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	Viamux Ltd	 <p>Viamux is a leading supplier of small-scale DAB solutions in the UK &amp; Republic of Ireland. Established in 2017, Viamux specialises in Ofcom licence applications and coverage predictions as well as designing, building, installing, operating and maintaining small-scale radio multiplexes in:</p> <ul style="list-style-type: none"> <li>• Exeter</li> <li>• Torbay</li> <li>• Plymouth</li> <li>• Manchester</li> <li>• Liverpool</li> <li>• Cardiff</li> <li>• Edinburgh</li> <li>• Birmingham</li> <li>• Blackpool</li> <li>• Cheshire East</li> <li>• Cheshire Mid</li> <li>• Londonderry</li> <li>• Newcastle &amp; Gateshead</li> <li>• Nottingham</li> <li>• Preston</li> <li>• Sterling and Falkirk</li> <li>• Warrington, Widnes &amp; Runcorn</li> <li>• Wolverhampton</li> </ul> <p>More info: <a href="http://www.viamux.com">www.viamux.com</a></p>
Ongoing maintenance of the transmission equipment	Viamux Ltd	
Installation of the Multiplexing equipment	Viamux Ltd	
Day-to-day technical management and maintenance of the multiplexing equipment (if different from response to question 3.28 above)	Viamux Ltd	

## Timetable for coverage roll-out

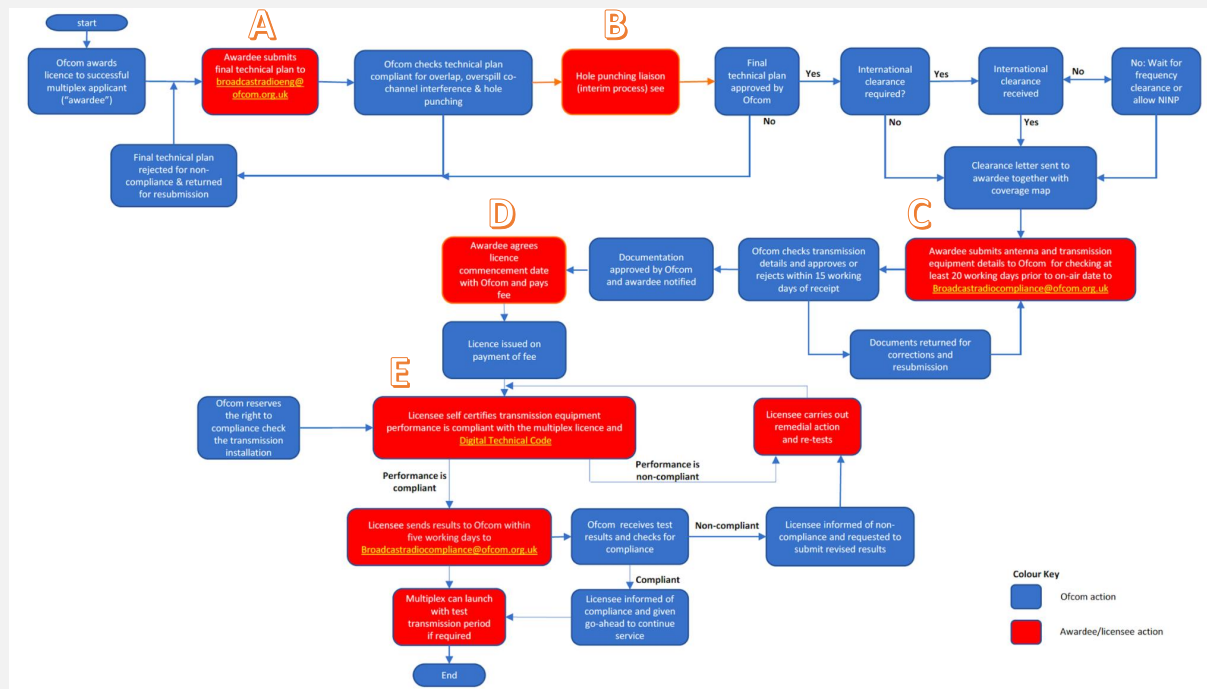
- 3.23 Please tell us how soon after licence award you expect your multiplex service to become operational and achieve the coverage you are proposing:

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

Our aim is to launch the multiplex within 12 months of the licence award subject to Ofcom approval of our final technical plan.

Funding is already in place and heads-of-terms are broadly sufficient to meet the operating costs of the multiplex. We are continuing to actively pursue all expressions of interest and are confident the East Devon service can launch with a strong line-up of services, including meaningful speech and content for local audiences.

Following the 'Guide to Launching' flowchart and the procedures set out in Ofcom's Technical Policy Guidance we aim to accelerate the implementation timetable by focusing on stages A to E.



### Stages:

**A:** In response to any technical mitigations in the award letter, we aim to finalise our site agreements and technical plan and submit to Ofcom within six weeks.

**B:** On receipt of the hole punching document we will liaise with the national and local multiplex operators immediately. Responses received will be sent to Ofcom.

**C:** Once the technical plan is signed off by Ofcom the equipment will be ordered and specifications shared with Ofcom. Installation date is scheduled and Ofcom is notified with twenty days' notice.

**D:** Equipment is installed and commissioned.

As a leading small-scale DAB provider, Viamux will manage the implementation of the project. Availability of all equipment, software and professional services to meet our timescales are already confirmed.

We will be responsible for finalising site agreements and arranging broadband connectivity. A project GANTT chart (Appendix E) details the tasks, activities and timescales under which the implementation will be governed to achieve our target launch date.

- 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.

**The project GANTT chart (Appendix E) sets out the precise, key stages in the implementation of the multiplex together with the timeline.**

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

### About this section

Section 51(2)(ca) of the 1996 Act requires Ofcom to take into account the desirability of awarding a small-scale radio multiplex licence to a body corporate that is providing – or proposing to provide – a C-DSP service in the locality being advertised (or involving such a person as a participant in the licence-holding company).

Section 51(2)(f) of the 1996 Act requires Ofcom to take into account evidence that the applicant has support from providers interested in having their existing or planned programme services carried on the proposed multiplex.

Note that we do not require applicants to provide us with a full line-up of services they intend to provide, or details about the content of those services.

### 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):

Sid Valley Radio is a participant in ExeDab. It has operated as an online station for many years and would have liked to have extended into broadcast radio earlier, had an appropriate community licence been advertised. It submitted its C-DSP application to Ofcom in May and its licence was awarded in July. The number is CDP105370BA/1.

Based in Sidmouth, the largest settlement in the polygon, Sid Valley Radio broadcasts from the town's main community and health hub, the Stowford Centre, and is closely involved in the centre's management. ExeDab has the centre's agreement that it can be used as a transmitter site, should future enhancement of the service be required.

Broadcasting online for seven years, the station is a not-for-profit organisation run by a team of around 25 volunteers from all walks of life and backgrounds. Largely music-based, it runs more speech programming in the afternoons, and specialist music in the evenings. A not-for-profit organisation, all members of the station are local to East Devon, and it has a successful work experience programme with local schools. A number of students have continued to volunteer with the station following their placement.

Following Ofcom's advertisement of the licence area in April, Sid Valley Radio became a shareholder in ExeDab, with voting rights proportionate to its stake. Whilst this is relatively modest, it means Sid Valley Radio, as with all ExeDab participants, has skin in the game, has contributed its proportion of ExeDab's costs in cash, and is determined to make a success of small-scale digital radio in East Devon.

The addition of Sid Valley Radio to our group brings the number of community radio stations in ExeDab to three, although to comply with the regulations, only Sid Valley Radio will operate as a C-DSP licensee. Community radio stations own 28 per cent of ExeDab.

## 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.

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

Name of service provider and station name	Proposed C-DSP or DSP	Nature of evidence of support provided
Sid Valley Radio	C-DSP	Participant in ExeDab, with signed heads of terms
Phonic FM	DSP	Participant in ExeDab, with signed heads of terms
Radio Exe Devon	DSP	Indirect participant in ExeDab, with signed heads of terms
Flashback	DSP	Indirect participant in ExeDab, with signed heads of terms
Ignite	DSP	Indirect participant in ExeDab, with signed heads of terms
Pop Up Devon	DSP	Indirect participant in ExeDab, with signed heads of terms
Devoncast Radio	DSP	Indirect participant in ExeDab, with signed heads of terms
Devon 10Ten	DSP	Indirect participant in ExeDab, with signed heads of terms
Radio ExeMas	DSP	Indirect participant in ExeDab, with signed heads of terms
Zest	DSP	Signed expression of interest
Diamond UK	DSP	Indicative expression of future interest, with caveat
BFBS Radio	DSP	Signed expression of interest
Access All Ariels	DSP	Signed heads of terms
Cross Rhythms	DPS	Letter of support

## 5. Fair and effective competition

### About this section

Section 51(2)(g) of the 1996 Act requires Ofcom to assess whether, in contracting or offering to contract with programme service providers, the applicant has acted in a manner calculated to ensure fair and effective competition in the provision of community and local digital sound programme services.

In assessing applications, we need to have confidence that the prospective small-scale radio multiplex licensee has approached a wide range of potential service providers. Negotiations that have taken place between the applicant and potential service providers need to have been demonstrably fair, and the terms of any contract for service provision must be fair and non-discriminatory.

Applicants should note there is one further question relating to fair and effective competition in Part B of the application form.

- 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?



In the interests of transparency and fair and effective competition, we moved quickly to publicise our intention to apply for this licence, and to promote our proposed service publicly in the polygon and with the wider industry. Our pre-application activities included:

**Online promotion:** Within days of Ofcom's advertisement of the East Devon polygon, we announced our proposed application on the ExeDab home page at [www.exedab.com](http://www.exedab.com), on [www.radioexe.co.uk](http://www.radioexe.co.uk) (a later story is at: <https://bit.ly/4bAVHmC>) as well as on participants' social media channels, and on air on relevant participant stations. We provided details of the polygon and the opportunities for prospective service providers. The ExeDab website contained a form for stations to make expressions of interest.

[Home](#) [About](#) [The Partners](#) [News](#) [Join Us](#) [Contact](#) [East Devon](#)


## A new network for East Devon

Broadcast regulator Ofcom has announced that East Devon is to be among the areas to get a new DAB radio network.

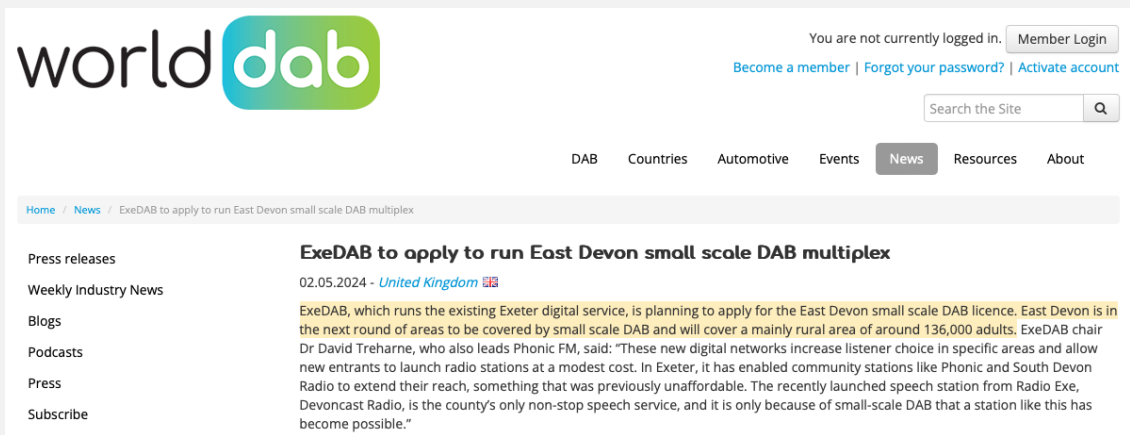
ExeDab is planning to apply to run the service, just as we do in Exeter.

The proposed coverage area for East Devon overlaps with our existing network and we will attempt to cover as many of the 135,000 residents as we can, whilst keeping the service affordable for small broadcasters.

Our consortium includes Devon's Radio Exe, Phonic FM and Riviera FM, and we are to be joined by Sidmouth-based Sid Valley Radio.



**Media coverage:** To make as many people as possible in the polygon and the broadcast industry aware of our plans, a press release announcing our intention to apply to run the East Devon multiplex was issued shortly after Ofcom's advertisement. This was picked up by local and industry press, further directing people to the ExeDab website. Social media coverage also resulted from this press announcement.



## Sid Valley Radio joins East Devon broadcast bid

News Home More from Community News

Wednesday, 1 May 2024 12:45

By Radio Exe News



### New digital stations planned for East Devon

A Sidmouth community radio station has joined a consortium planning to apply to run a new digital radio network for East Devon.

Sid Valley Radio is becoming part of ExeDab which runs the existing Exeter digital service, and which includes Devon's Radio Exe, Phonic FM and Riviera FM.

**Outreach:** Our participants are well-connected in the media sector in Devon and identified potential services that may be interested in carriage. We made calls and sent emails to invite them to join our line-up.

### Approaching a wide range of prospective service providers:

We proactively contacted known existing service providers in the south west, including online stations that may wish to make the switch to DAB in East Devon and the surrounding area. Commercial, community, hospital and student radio stations were all approached.

We outlined our draft transmission plans, as far as practicable whilst negotiations were ongoing with landowners, as well as headline terms of agreement and indicative carriage fees.

From our experience in round one of multiplexes, for which ExeDab was originally incorporated, we are aware that expressions of interest do not necessarily turn into firm commitments to broadcast. The East Devon polygon covers a similar number of residents to the Exeter multiplex, but because of its very rural nature and the very low number of existing stations in the area, we are proceeding with extreme caution to ensure that our financial plan is sustainable should expressions of interest not proceed to final contracts. We expect the number of services to be modest and have budgeted accordingly.

### Acting in a manner calculated to ensure fair and effective competition

ExeDab has always acted in a manner that promotes fair and effective competition. Our negotiations with potential service providers are, and will continue to be, demonstrably fair and non-discriminatory. Our reserved capacity policy is published on our website.

We will continue to seek additional service providers and will be delighted to welcome any organisations that have hitherto given exclusive support to any rival group that may emerge. In the interest of fair and open competition, we have not asked any potential service provider for exclusivity in the application process.

Following the launch of the multiplex, we will continue to operate a transparent rate card policy, published on our website. ExeDAB's pricing strategy is pitched to ensure sustainability in a rural polygon requiring multiple transmission sites. Moreover, the structure of our rate-card reflects our core aim of supporting and encouraging community broadcasting and new small-scale commercial services with numerous options of contract terms so stations can opt for the one that suits them best.

We offer broadcasters the flexibility of having their service encoded at source or via our cloud encoders, making it very flexible.

## 6. Declaration

### About this section

This form must be submitted by the body corporate which will hold the licence. The declaration must be certified by a company director or the company secretary, and covers all information provided by in the applicant in both Part A and Part B of the application form. The declaration must also be dated.

- 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:**

DR DAVID TREHARNE

**Date of application:**

18 JULY 2024

**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.**