

The
Consultation
Paper



**Neil Stock
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By email & Post: neil.stock@ofcom.org.uk

Dear Neil,

Asian Sound thanks you for the opportunity to comment on your consultation about the future licensing of the FM spectrum for use by commercial radio.

Rather than submit a response to each and every separate question, we thought it better and more effective to comment generally about some of the points that are raised in the consultation. We would also like to take this opportunity to thank you for putting together such a comprehensive document that so clearly understands our industry. We are pleased to see forward thinking and new ideas coming from our new regulator, while broadening of listener choice remains at the heart of the licence award process. We hope Ofcom will more positively licence services that clearly broaden listening choice for particular segments of the UK community, rather than offering more middle of the road music offerings, which are so well catered for nationwide.

Asian Sound is the broadcaster for East Lancashire and Manchester. We have operated this licence for nearly eight years since 1996, proof of our commitment to the industry. Yet we are disappointed that despite the longevity of our involvement in growing and developing ethnic radio, we have not been able to grow and develop our business base. My company applied for several new licences under the previous regulator, the Radio Authority,

all unsuccessfully. These were in central Scotland, London and North West region. I do feel that our continuing good performance and track record should count for something in these applications and I do hope that it is something of which Ofcom takes more detailed notice in future awards.

In the past, I have registered expressions of interest to operate new Asian Radio services in all highly populated Asian Markets in the UK. I am keen to expand my interests and intend to apply for FM licences in Manchester, Liverpool, Blackburn and the North East in the future.

Asian Sound disagrees with your intent for community radio to use scarce FM spectrum. We believe that this spectrum would be better used and initially more beneficial for local listeners, for the upgrading of long-term committed broadcasters on AM – such as Asian Sound. It is well known that AM is an inferior waveband and we have a difficult task to maintain listeners, particularly at nighttime when the signal quality deteriorates markedly. My company would be very interested in utilizing FM spectrum, should it be made available to existing MW services.

While we would agree with Ofcom that generally larger licences are more profitable than smaller ones, there are notable exceptions. Consequently, pre-conceived ideas and perceptions should not get in the way of independent broadcasters wanting to trial new services on FM if a useable frequency is available. Some operators will be able to run small, but perfectly viable radio businesses if the local market conditions allow, and if their own product is well targeted. We also would not wish to see London based operators take all the new FM prizes. There are some strong, independent regional operators who should be rewarded with new frequencies and the opportunity to operate new services if there are the relevant frequencies available.

In terms of the new process for applications that you are proposing, I believe that these are a welcome development that should expedite the application process and will, over time, prove more transparent. We are also pleased to see that different areas and applicants will have their forms tailored, although care must be taken to ensure that the field is even to new entrants and existing operators alike.

Asian Sound does not shed a tear for the disappearance of the Chairman's interview, since company executives are better placed to answer Ofcom's more detailed follow-up questions and we also welcome the fact that these follow-up letters will be posted on the Ofcom website for public scrutiny.

While we do believe that a system, such as that adopted in Ireland, may be better suited at finding market opportunities for Asian and other ethnic services, we do appreciate that it is a longer process. This should be noted and possibly returned to if too many mainstream music services are being awarded by Ofcom.

We also welcome feedback on unsuccessful applications, in the hope that losing applicants can learn from mistakes if they have a genuine and long-term ambition to operate in the UK radio industry.

Yours sincerely

Shujat Ali

Chief Executive; Asian Sound