

Commercial Radio Companies Association

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Neil Stock
Head of Radio Planning & Licensing Ofcom
Riverside House
2a Southwark Bridge Road London
SE19HA

Dear Neil

CRCA views on 'The Future Licensing of FM Commercial Radio'

Thank you for the opportunity to comment on the above consultation. We believe the document represents creative and forward-looking thinking and we congratulate Ofcom on it.

CRCA recognises that the majority of issues raised in the consultation are for members to respond to on an individual basis. However, there are two areas in which the trade association wishes to comment on behalf of membership as a whole.

Publication of listening data

We question to what extent it will be possible for Ofcom to publish existing recorded listening patterns in all areas which may be advertised. This is because RAJAR data is only available for publication on the basis of existing TSAs and not on a 'mix and match' postcode basis.

Even if a new station will have the same MCA as an existing licensee e.g. Aberdeen, they may choose to survey different TSAs.

However, we anticipate that particular problems may occur when a licence is advertised within a sub-section of an existing station, e.g. Kidderminster. In such a circumstance, appropriately weighted data will not be available from RAJAR because the new Kidderminster TSA does not already exist within the survey. Even if the existing licensee has access to postcode analysis for the sub-section, it is prohibited from publishing the data because it is unweighted.

Possible solutions to this include conducting original research in the new area, however, this causes problems because it would be based on a different methodology (and would therefore deliver different results) from RAJAR. Alternatively, Ofcom might consider becoming a member of RAJAR and commissioning a special (and because of timing issues, probably boosted) TSA survey for the area to be licensed.

Licence Application Fees

CRCA believes that, consistent with past Radio Authority practice, Ofcom should recoup the costs of the licensing process through the charging of application fees. We hope that, as a result of the slimmed-down approach to licensing being adopted by Ofcom, the costs of the process would be less than those incurred under the previous regime, although we recognise that, to some extent, this might be countered by the cost of audience research.

Please do not hesitate to contact me if you have any queries.

Yours sincerely

Lisa Kerr
External Affairs Manager