

Dear Mr.. Stock

I wish to make a few comments about the above topic and the consultation currently being undertaken by Ofcom.

I will address the questions which I feel are relevant to my beliefs but first I would like to make a few related points in regard to the FM spectrum.

I spend a lot of time travelling around especially flicking between the North West (live in Warrington) and East Midlands (in particular Derby) and the difference between use of commercial radio in the two regions is worlds apart.

In the North West, commercial radio is more prominent in public places with a good 70% of shops having some sort of commercial service on. However in the East Midlands it's very different. It's about 50% and even then it's mostly RAM FM or the equivalent CHR service.

I'm 25 and so therefore am in the commercial radio generation but none of my peers in Derby listen to a large percentage of commercial radio, it is normally Radio 1. Commercial radio listenership is very rare and mostly is oriented around the channels carried through Sky or NTL cable.

I was disappointed that Ofcom had not decided to advertise another regional for the East Midlands. I know that there are lack of frequencies and the area suffers from its closeness to the West Midlands but I think space could be found even if it only meant coverage of the three cities and the immediate areas in between (such as North West Leicestershire and Derbyshire/Nottinghamshire border communities such as Ilkeston and Long Easton). Ideally I think a youth formatted station would be a better option in expanding commercial radio in the region as everyone 25+ is well served.

For example there are a number of frequencies which I believe would work, some of which have been used for RSLs (in particular 97.5 in Nottingham and Leicester and 107.6). I am no technical expert but by moving around the dial I have had the following thoughts for a regional option.

97.5 could form the basis (i.e. the main high powered frequency) of a regional in my opinion, or even 97.4 to avoid problems with Radio 1 (with

Rutland Radio's low powered Stamford relay reallocated in both cases). This would be better suited from a Leicestershire location (such as Copt Oak used by Century) so a null of a certain percentage north could be put on the transmitter to avoid interference with Hallam FM in Sheffield. This could then be teamed up with lower powered relay frequencies. My immediate thoughts on these are 97.1 or 107.6 in Nottingham (with the Access station being moved, maybe to a BBC sub-band), and either 96.7, 107.2 and 107.6 in Derby (depending on what is used in Nottingham) with only slightly more coverage compared to SAGA's 101.4 relay frequency.

In my opinion, the INR sub-band is underused in the region. I believe a high powered use of 100.9 from a Nottingham location (such as Mapperley Ridge) teamed up with relay frequencies (on say 100.5 or 101.8 or even 101.4 if SAGA's 106.6 frequency was to move to its full allocation) serving Derby and Leicester city centre would cover the majority of the region quite well. Again I know there could be issues with Classic FM's Peterborough frequency and Centre FM in Lichfield but I think these could be sorted out.

As regard the North West, I would like to see another regional licence and would like to see a frequency like 106.0 used for that (or maybe three frequencies in the main areas around 106 i.e 105.8 Liverpool and 106.2 Manchester). If not a regional option I think there is definite scope for the licences that Ofcom have proposed and would like to see at least two new licences in Manchester. The 97.7 frequency the BBC used for its Commonwealth Games station should be looked at and this provided good coverage of Greater Manchester and its immediate surrounds (it was as robust as Key 103 which was good considering it was, as I am led to believe, half the power). In my opinion the 97.6 frequency used for RSLs would be blasted out in the fringes by Rock FM.

Anyway, they are a few what I believe are related points I would like to make. Regarding the questions asked in the consultation, I would like to address the ones I feel I have an opinion about.

Question 2 : Do you agree with our proposed policy for allocating FM spectrum?

On the whole I do, but I believe more could be done to find frequencies in BBC sub-bands especially in areas which are crying out for new commercial services.

Question 3: Do you consider that, where possible, advertising larger or smaller licences best serves the interests of citizen-consumers?

I think there is not a standard answer I could give to this. It depends on the area. However it is my belief larger licences are in metropolitan areas the better option as they can provide more specialised or targeted stations to better complement the marketplace. It has to be evaluated on a market by market basis. I can think of some towns where a localised service would work and others where it would just be another same sounding station.

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Question 4: Should we seek to aggregate any or all of the potential licence areas within the following four broad regions:

North-East England, South-West England, South Wales, Solent

What are the costs and benefits attached to adopting such a policy?  
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Again I think aggregating licences would better serve the North East and South Wales. It has its mix of services - CHR, AC, Dance and Gold/Classic Hits and I believe smaller/city licences may only lead to duplication of what is already there (i.e a full service station) or a specialised station which finds it hard to flourish.

As for as South-West England goes my experience of travel in that area is that a regional covering both Devon and Cornwall would work well. However using your scenario I think two separate Devon and Cornwall licences would be the better option and allow services to be of greater relevance to the area it serves (this belief is mainly due to the relevant immaturity of the Cornwall radio market compared to Plymouth, Exeter and Torbay).

However, if frequencies could be found for both a Cornwall and a South West regional licence I would suggest that would work better.

As for the Solent, I know Portsmouth, Southampton and Isle of Wight have an abundance of AC/full service stations so a combined licence (either with the two cities or as part of a regional) would be a better option instead of two city licences. As for as Bournemouth a AC, full service or at least an older station (i.e. SAGA) as a local licence would fill a gap there.

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Question 6: What is your view regarding the proposal to provide information tailored around a specific licence area at the time of its advertisement, rather than generic guidance on the licensing process?

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This is a very good idea but should only be a base. If a prospective licensee is really keen in getting the licence, it is up to them to do the in-depth investigation into the marketplace. I believe this point is relevant to Question 8 as well.

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Question 11:

Do you agree that a short-listing process such as that employed in Ireland could potentially slow down licensing? How might the adoption of such a procedure improve the overall process?

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I think this could slow down the licensing process, but if a strict time scale is adopted this could not be such a problem. For example short listing after two months with another two or three months before award.

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Question 13: Are you confident that these proposals for a new licensing process can deliver a regulatory system which is effective, consistent and timely?

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From what I've read I think these proposals will create a effective, consistent and timely system.

Thank you for reading my views and whatever the outcome I look forward to seeing the commercial radio industry growing on FM and addressing the balance with the BBC.

Yours sincerely

Dean Bridges