

Name and title: Mr Gerry Morrissey, Assistant General Secretary

Representing: BECTU

Comments:

BECTU notes the issues set out in the discussion document and that there may be a more detailed set of proposals available for consultation in 2007.

We do not propose to make a detailed response to the discussion document. Our initial views on some of the issues covered were set out in our response to the earlier Ofcom consultation 'Radio - Preparing for the Future' - including the regulation of local material and the broader strategic framework for radio.

In relation to the current discussion document, we hold the following general views:

- We remain unconvinced about the case for not re-licensing analogue stations and for switching to digital services.
- Regulatory requirements for local material (specifically including news) should be retained, whether via analogue or any replacement form of digital broadcasting.
- A framework of ownership requirements to ensure plurality should be retained for analogue services or for any alternative digital services. We accept that ownership regulation may need amendment to adapt to the growth of digital radio. We do not accept that this should imply a further reduction or even removal of ownership regulation.
- We retain a strong underlying preference for a continuing framework of regulation which seeks to ensure listeners' access to a wide range of high quality programme material on commercial radio as well as the BBC; which can address any potential market failure to provide such material; and which does not accept as inevitable that 'market forces will prevail'.

We look forward to a further process of consultation on any more detailed proposals from Ofcom in this area.