

1st February 2005

Peter Davies
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA.

Dear Sir,

I'm writing in reference to your proposals for the future of commercial radio in the UK, as outlined in the "Preparing for the Future" consultation document issued in December. The ideas you put forward are both interesting and thought provoking but I believe there is some cause for concern, particularly in relation to those which refer to maintaining the "localness" of local commercial radio stations.

I am well aware of the fast moving developments in commercial radio in terms of the move towards digital broadcasting and the convergence of different technologies. I am also aware that the expansion in the number of both digital and analogue stations has created a much more competitive marketplace. However I'm worried that local radio - and the listener's experience of it - could suffer heavily as a result of the deregulation you are proposing.

You emphasise that you wish to move away from "input" regulation of local radio in favour of a greater emphasis on what the listener gets out of it. Yet your proposals to remove all restrictions governing the networking and automation of programmes appear to fly in the face of improving the listener's experience. In terms of what local radio is set up to do, surely nothing is more suitable than a local presenter talking to local people about local things? Otherwise a listener may as well tune away to a national station or one that covers a larger region. By removing these restrictions, you seem to be suggesting that the local listener's experience would be improved by more networking or automation - or you are simply satisfying the commercial radio operators' desire to save on staff costs. If it ain't broke, why fix it? Limiting networking and automation may not be "the best way to protect quality", but it certainly doesn't harm it.

I am aware of the larger radio groups' desires, in particular GWR and Capital, to introduce "news hubs" from which bulletins are compiled and read. I know that at least one trial of this has taken place. In my opinion, if news is read outside the station's TSA, it should only be allowed **in addition** to fully staffed existing newsrooms. On the upside, having one reader for several stations will free up local journalists to research and report on stories. The danger though is that the groups will use the relaxation of the rules to employ the bare minimum of staff at individual stations resulting in poorer quality news and stories that masquerade as local but in fact aren't. For example, in Devon, Gemini FM, Plymouth Sound and Lantern FM might all end up carrying the same "Devon" or "South West" stories, rather than stories from the individual areas themselves - people may as well listen to BBC Radio Devon and get real local news from their newspapers. You say you would consider insisting on a professional journalistic presence during all required local programming

hours - this is an excellent idea as it would presumably require at least two journalists to staff the station every day. I hope Ofcom adopts this measure which should go some way to safeguarding local news programming.

Local news in the commercial sector has suffered in some respects due to a lack of resources or commitment on the part of the owners. Some wages are ridiculously low - I understand the starting salary at one large group is nine thousand pounds. It would be good to think that Ofcom would be able to raise the quality of local news through some new type of control. Many "heritage" stations, particularly in the south of England, which once had good local news services, have lost them because of a lack of commitment or an attitude that news isn't "cool". Full news programmes have disappeared in many instances. I'd like to make the broader point that local information in general - particularly "what's ons" - have also disappeared from many of these stations, probably for similar reasons.

I believe that relaxing the restrictions on local commercial radio at this time could cause an irreversible decline. The combination of these proposals with the liberalisation to "2 plus 1" ownership in any one area and the lifting of foreign ownership restrictions could leave Britain with a network of identical sounding radio stations that are unresponsive to local needs and driven by corporate entities that neither know nor care about the areas they purportedly serve. It is, I believe, much easier to prevent this through regulation now than by trying to turn back the clock if it goes wrong. I recently travelled around the United States for six months - apart from in the larger cities, all I heard on my Walkman was networked or automated programming, no news except at breakfast (and even then much of it was "showbiz"), about twenty minutes of adverts an hour and nothing that really enhanced my listening experience (and I wasn't a local!) I would be saddened if Britain eventually went the same way.

Having worked at several commercial radio stations, I am now a broadcast journalist at a local BBC radio station. I care passionately about public service broadcasting - both BBC and commercial - and hope Ofcom will carefully consider the potential consequences to local radio of these proposals.

I support the suggestion that stations should publish a "Health Check" of how they're meeting their format commitments. I'm also very much in favour of the expansion of community radio, provided it is well funded. However I still don't believe it is an excuse for letting local commercial stations do what they want - both should broadcast in the public interest.

I also support the expansion of digital radio - but again I would emphasise that every single person in the UK has somewhere they call home - and all should benefit from strong local or regional stations which are part of their community.

I look forward to hearing the results of this consultation.

Yours faithfully,

Jon Bithrey