

## **LOCALNESS**

- 1. Do you agree with our proposals to use formats as the primary tool of regulation for analogue commercial local radio ?***

Formats are the basis for analogue stations to deliver appropriate output to serve the community and therefore should be used for regulation for analogue commercial local radio.

- 2. How do you think the objective of ensuring the provision on commercial local radio of a high quality news service, including local and national news, is best achieved ?***

KMFM have a proven track record of a news hub providing quality local news. It allows small stations to be operationally effective and deploy their resources effectively. An output-based regulatory approach is welcomed but we would be concerned if staffing quota's were introduced. As a small radio group it is essential for us to deploy resources efficiently and don't see how this rule will improve our output. It would put unnecessary increased costs on small stations that struggle to make a profit

- 3. Should stations be allowed to decide for themselves how much programming they automate ?***

The success of small stations we believe is based on being local and relevant for our area and as per our format. Automation can be utilised to still deliver local content but also to ease the burden of costs at off-peak times in order to bolster resources daytime and deliver our localism.

- 4. Should the requirement for a station's studio's to be based within the measured coverage area be relaxed to require the station to be based within the licenced area ?***

Yes as this offers small stations more opportunities to reduce their cost base.

- 5. Do you agree that a station's local hours, as defined by its format, should include local material, but that, outside of these hours, stations should be free to share material with other stations on a network basis as they see fit ?***

It is essential for stations to be able to share material with other stations outside of a station's local hours, as defined by its format.

- 6. Do you agree that each station should be required to maintain a format and localness file, available both at its premises and online, which demonstrates how it is meeting its obligations ?***

As local stations we support the "Format and Localness File" and see it as a way to connect with our listeners through our websites. We are proud of the

service we offer our communities and are happy to have a transparent policy and content. However, we have concerns on reporting on matters of staffing or production techniques and believe this should be done on an informal per-station basis by Ofcom if they wish to gather information.

- 7. Do you agree with our revised localness guidance, which sets out the factors stations should take into account in providing local programming ?**

In light of comments under question two we recommend removing the words "equivalent at least to full time professional journalist cover".

## **DIGITAL**

- 8. Do you agree with our proposals to allocate more spectrum in VHF Band III for DAB-compatible use (subject to spectrum clearance and international agreement) in the following way:**
- **Three blocks to provide local multiplexes to those areas which currently do not have their own local multiplex and some areas which already have local multiplexes ?**
  - **One or two block for national coverage (depending upon whether four or five blocks of spectrum are available in total) ?**

It is important for new spectrum blocks of Band III to be made available to encourage a competitive DAB transmission supply market, to ensure the future of smaller stations such as KMFM. Additionally transferring to digital will be expensive for a small group like ourselves. We would welcome Ofcom's support with CRCA's proposal of tax-breaks or subsidies to help small stations.

- 9. Do you agree that the proposed local DAB digital radio multiplexes should be awarded as Broadcasting Act licences?**

Yes

- 10. Do you agree that the frequency blocks proposed to be allocated to national coverage should be awarded under the terms of the Wireless Telegraphy Act only (i.e. without the need for a Broadcasting Act licence) ?**
- 11. What demand do you envisage there being for nationally-allocated DAB compatible spectrum ?**
- 12. Do you think the limit on non-programme related data carried on each commercial DAB digital radio multiplex should be raised from the current limit of 20% ? If so, what should the limit be raised to ? What do you envisage extra capacity would be used for ?**

Any spare capacity left for other data should be used in ways agreed between the multiplex owner and Ocfom in each case

**13. Do you think the limit on non-programme related data (including radio) carried on each commercial digital terrestrial television multiplex should be raised from the current limit of 10%? If so, what should the limit be raised to ?**

**14. Do you agree with the proposal to abolish the minimum bit-rate limit for DAB digital radio and replace it with a co-regulatory system akin to that applied in television for picture quality ?**

Yes