



## **BALPPA RESPONSE TO OFCOM CONSULTATION RADIO RESTRICTED SERVICES AND 55 TO 68 MHz**

BALPPA is the leading trade association representing the interests of owners, managers, suppliers and developers in the UK's commercial leisure parks, piers, zoos and static attractions centre. We speak for some 300 members across the UK, including Blackpool Pleasure Beach, Alton Towers, British Airways London Eye, Butlins, Madam Tussauds, Thorpe Park and Woburn Abbey amongst our members.

Many BALPPA members would like to explore the option of broadcasting around their attractions to provide information to their visitors who are traveling to the attractions about parking facilities and traffic problems. Whilst the proposals documented in the consultation paper do not fully address all of that we seek, BALPPA is pleased that the consultation paper does recognise previous recommendations that our industry has made to OFCOM on this issue and the efforts you have gone to in order to begin to address our needs. We are pleased to have the opportunity to respond to OFCOM's consultation on radio restricted services and 55 to 68 MHz.

BALPPA has previously written to OFCOM on the issue of Short-term RSLs (S-RSLs) to demonstrate the limitations that the time restrictions contained within S-RSL licences have for commercial leisure attractions, and their inappropriateness as a solution for our member's broadcasting needs. The proposals contained within the consultation section on Long-term RSLs (L-RSLs) means that BALPPA will only be responding to the most relevant questions in the consultation, those concerning L-RSLs.

### **Question 4) Do you agree with the proposal to allow commercial establishments to apply for L-RSL licences?**

The proposal made by OFCOM to allow commercial establishments to be granted L-RSLs, following representations from marinas, theme parks and shopping centres, is most welcome. The new proposals will allow BALPPA members to provide an information service to visitors detailing access instructions, directions for parking facilities and feature events inside the attraction, as well as providing crucial information, for example, reporting lost children.

Whilst the proposals for the extension of L-RSL licenses to include commercial organisations, contained within the consultation document are certainly a step in the right direction, BALPPA would suggest that leisure parks and similar organisations should be allowed to broadcast more widely outside of a specific geographical area, for example the boundaries of a

theme park, allowing the facility to provide further information of value to visitors and the local community on large-scale events and traffic congestion.

*Question 5) Do you agree with the proposal to offer L-RSLs for shorter periods of one year or more, up to a five-year maximum?*

The time-period of granting for L-RSLs is more suited to the operational needs of commercial leisure parks and will be much less of an administrative burden for BALPPA member businesses. The consultation proposal to make the license duration for L-RSLs even more flexible is very welcome, allowing commercial leisure operations to select a time period most appropriate for their needs as well as providing a long-term vision of the broadcasting services they are able to provide.

If you require any further information regarding BALPPA's response to the OFCOM consultation on Radio Restricted Services and 55 to 68 MHz, please contact Colin Dawson, BALPPA Chief Executive on 020 7403 4455.