

Dear Mr Davies,

Radio - Licensing Policy for VHF Band 111 - Sub-band 3

On behalf of *The National Campaign for Children's Radio*, we respond to your consultation.

In direct relation to this may we welcome your six values, under The Public Purpose of Radio, and your recently published views that children are an under-represented audience in UK radio. These developments reflect our campaign's research and aspirations for fairer allocation of radio spectrum for children's services.

We consider that the proposals for VHF band 111 to be allocated for local and national T-DAB services are fair and we sincerely hope that Ofcom will use its power to ensure that an equitable amount of this valuable public estate goes to serve children.

Many hundreds of MPs, peers, practitioners in children's entertainment, education and care, parents and children themselves, attest to the unique value of radio in children's learning and leisure, and have supported our campaign over some twenty years, therefore we are delighted and relieved that Ofcom is highlighting our youngest citizens as a neglected and deserving audience.

There are now some four hundred UK radio services allocated to adults [aged 15 years plus] but, even including sporadic programming during term times, an aggregate of around three for children. These comprise Takeover Leicester [a small Community-based service]; Capital Disney [regional DAB]; FUNradio [local DAB]*; three hours a day on BBC7 [national DAB] and 30 minutes each week on Radio 4 [national analogue]. BBC7 must continue to include children as part of its remit but our concern is that the rest remain hostage to commercial pressure or Corporation whim and - as happened historically - could founder, there still being no statutory protection for children's radio [unlike their television].

Children's radio is an original and potentially commercially viable concept in the long-term but if it is to benefit from and assist the take-up of T-DAB, as it certainly can, it will need the special protection that Ofcom has powers to provide for vulnerable groups, through the Broadcasting Act.

We ask you to note that technology to deliver radio [and much else] down mobile 'phones is of little help to children - especially for very young ones - given concerns about possible danger to their brains and the need for sustained use of earphones which can cause infection and can be chewed and even swallowed..

It has been argued that many ground-based initiatives such as Sure Start and the goals in the Childcare Bill, announced by Beverley Hughes 09/11/05, can be delivered so much more cost effectively with the support of daily radio and, as we have long pointed out, properly managed through a public/private partnership, at least one national network dedicated to children could be sustained, and a wealth of extra resources besides.

We believe this would represent a most cost efficient widening of radio choice for community benefit.

Yours sincerely,

The Baroness Warnock - President

Susan Stranks - co-coordinator *National campaign for Children's Radio*

*Susan Stranks founded abraCaDABra! - the world's first DAB service for children - and declares an interest of 4% in Children's Radio UK Ltd., the company which took it over.