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Nicole Shinnick
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15th September 2009

Dear Nicole,

Media Ownership Rules Review

Folder Media is a member of the Radiocentre, and we note and in the main support their submission to the above Consultation. However, there are a number of areas where we believe regulation and legislation should be stronger.

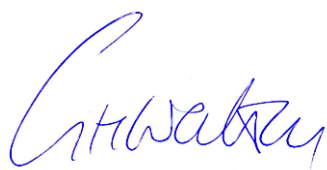
We support the proposal to remove the local radio ownership rules. We also support the local cross media ownership rules, which we believe should help encourage the successful development of more local multi-media companies that have interests beyond a single sector.

We do **not** support the recommendation to remove the current local multiplex ownership rules. We believe that the current restrictions are important in helping protect plurality, and ensuring diversity of choice in terms of both services and service providers. We also believe that they help ensure that there is freedom of access to multiplex capacity, which could be restricted where all local multiplex access in a certain area is owned and / or controlled by a sole party. We do not believe that the rules have been are, or could be, a potential obstacle to ensuring investment in the necessary digital infrastructure.

Whilst we are unaware of any cases where multiplex owners have sought to exert undue influence as gatekeepers, we are also unaware of any reasons to remove the regulations which were created to ensure that no one person has undue prominence and the ability to restrict access. The current rules are fit for purpose and we believe should be maintained.

Folder Media welcomes the Government's stated intention to upgrade national and local multiplexes by 2015 to enable analogue services to switch to digital. To deliver this 'drive to digital', it will be important to ensure that the necessary infrastructure, technology and legislation / regulations are in place to enable multiplexes to merge and extend their footprints. We do **not** believe that the removal of the ownership rules provides any further incentives in this area, nor will they act as a disincentive to this process and the investment required.

Yours sincerely,



Gregory Watson