

Title:

Mr

Forename:

Steve

Surname:

Perkins

Representing:

Organisation

Organisation (if applicable):

Local TV Network

Additional comments:

Question 1: Are there areas of Ofcom's overall strategic approaches and purposes, outlined in last years' annual plan that may need to change?:

Question 2: What are the issues and areas that should form Ofcom's priorities or major work areas in 2014/15?:

Question 3: Are there any specific areas for deregulation or simplification in the coming year?:

The Local TV Network requests that Ofcom review its Code on Scheduling of TV Advertising so as to exempt Local TV (L-DTPS licensees) from current regulations regarding scheduling of advertisements.

We believe that exemption from the scheduling rules is a natural corollary of the exemption (which we greatly welcome) from the advertising minutage restrictions. We note that Ofcom said in its statement on Licensing Local Television of May 2012 that it would be prepared to consider the issue further. Local TV is, of course, in many ways analogous to local radio, and it seems to us that the absence of scheduling restrictions on radio works well, without evidence known to us of consumer detriment. At the moment, the rules could be very restrictive in the Local TV context, even preventing the scheduling of breaks within key programming such as local news bulletins. And also a significant administrative burden, particularly for the smallest licensees.

We hope that Ofcom will include this in its plans, in the near future.