

## Consultation response form

<b>Consultation title</b>	<b>Localness on commercial radio</b>
<b>Full name</b>	Adam Findlay
<b>Representing (delete as appropriate)</b>	Original 106 & Central FM
<b>Organisation name</b>	New Wave Media

## Your response

<b>Question</b>	<b>Your response</b>
<b>Question 1: Do you agree that Ofcom's duty to secure 'localness' on local commercial radio stations could be satisfied if stations were able to reduce the amount of locally-made programming they provide? If not, please explain the reasons and/or evidence which support your view.</b>	Yes
<b>Question 2: Do you agree with our proposed amendments to the localness guidelines relating to locally-made programming? If not, please specify any amendments you think should be made instead (if any), and explain the reasons and/or evidence which support your view.</b>	<p>Yes but we think Ofcom could go further. We feel that the broadcasting landscape is changing so fast with new digital and web based broadcasters entering the sector that these proposals could soon be out of date.</p> <p>We also strongly feel that all freedoms afforded to DAB operators or simulcast operators should equally be afforded to FM only broadcasters as they prepare for the economic investment onto a DAB platform to help support the journey towards a DAB future.</p>
<b>Question 3: Do you agree with our proposed new approved areas? If not, please specify any alternative proposals you think should be considered (if any), and explain the reasons and/or evidence which support your view.</b>	<p>In as far as Scotland is concerned we do not agree with the TV region logic. We strongly feel that Scotland should be considered as one area and not split between a north and south divide. The flexibility to focus on a more relevant</p>

	<p>news and information service toward and an area rather than from an area is more important.</p>
<p><b>Question 4: Do you agree with our proposed amendments to the localness guidelines relating to local material? If not, please specify any amendments you think should be made instead, and explain the reasons and/or evidence which support your view.</b></p>	<p>In line with our view on question 2 we feel that those stations preparing for a DAB future should be given the best possible economic chance of getting there. This is especially the case if DCMS wish a positive take up of small scale DAB from small scale FM operators and community radio groups.</p>