

## Summary

The licensing process for local television is clear and consistent with other Ofcom broadcast licensing processes. However, a clearer indication of Ofcom's thinking in certain areas would aid potential bidders to look beyond the short-term to operations spanning the proposed 12-year licence period.

Crucially, it is unclear from the draft application form and supporting documentation how Ofcom will give weight to different facets of a bid.

For example, bidders are invited to consider the geography they intend to serve, including the possibility of serving larger area than identified in the initial indicative broadcast footprint. How will the "local" credentials of a bid be weighed against its commercial viability if bidder opts to serve a wider audience than originally outlined? The issue of how different aspects of bids will be weighted may be particularly relevant to the mid and smaller size local TV broadcast areas.

In common with other respondents to the consultation (such as the Belfast Telegraph), we agree that without accepted standards of audience measurement – such as BARB – generating national advertising revenue will be problematic.

### **4.66 Consultation question: Do you agree with our approach to dealing with requests for extension to coverage?**

No. The Multiplex operator would reap the knock-on benefit of wider coverage for its two additional channels while bearing none of the infrastructure cost. It seems inequitable to ask the L-DTPS licence holder to bear all of the cost of extending coverage when the Multiplex operator gain such a significant benefit.

### **4.73 Consultation question: is our proposed approach to multiplex roll-out timetable the right one?**

No. The latest proposals (March 12 2012) would see smaller channels pushed to the back of the queue for roll-out. We believe it would be more equitable to have a mix of small, large and micro stations in the first and then following waves of the multiplex roll-out.

### **6.9 Consultation question: Do you agree with our proposed localness requirement?**

**Para 1.28** *We are proposing a localness requirement: that, in usual circumstances, the studio from which the service will be broadcast, and/or the main production base of the service, should be located within the licensed area.*

**Para 1.29** *We are proposing to invite applicants for a local service licence to describe their programming output and how it will satisfy the statutory criteria, particularly how it will serve the tastes and interests of the target community, and broaden the range of local services available in the area.*

The localness requirement is essential. The draft licence application form makes it clear that there is a requirement for the programming and channel as a whole to deliver benefits to the local community – not just in terms of broadening the range of content available, but “social or economic benefits”.

How will Ofcom assess those benefits and will additional weight be given to bids that generate employment and retain revenues within the intended broadcast area?

**7.20 Consultation question: Do you agree with our approach to assessing L-DTPS applicants’ ability to maintain service?**

It seems likely that all bidders for a licence will be considering how a potential Freeview channel may be supported by an IPTV channel running in tandem online. This may have implications in terms of staffing, cost and potential revenues. While Ofcom requires such details to assess each bid’s business case, there is no scope within the wider application process to discuss how Freeview and IPTV might work together. Clarification is needed.