

**Title:**

Mr

**Forename:**

Julian

**Surname:**

Bray

**Representing:**

Organisation

**Organisation (if applicable):**

PETERBOROUGH TRIBUNE

**Email:**

[julianbray@aol.com](mailto:julianbray@aol.com)

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

Any stations/organisation employing an automatic playlist with one presenter based in say LONDON should be excluded from the next round. Independent Commercial Radio has ceased to be just that with a few huge groups buying up regional stations. Either offer only single national licences and scrap regional stations or ensure the OFCOM is doing its job to keep regional and local radio alive and in tune with local communities. Those who properly meet the local requirement should be offered pay as you go terms rather than a mandatory lump of cash up front which of course plays into the hands of the mega groups.

**Question 1:Do you agree that the proposed overall valuation methodology (including our objectives) and the proposed overarching principles are appropriate for the determination of the PQR and cash bid element of the renewed licences? If you do not, please explain why you consider that the overall methodology is inappropriate and what justifications exist for suggested alternatives:**

No see above

**Question 2:Do you agree with our approach to valuing the rights and obligations associated with the INR licences? If not, please explain why not. :**

No see above

**Question 3:Do you agree with our proposed approach to dealing with uncertainties for the purposes of the review? In particular, do you agree with our proposed approach to dealing with i) future trends in listening to the INR licences**

**ii) future trends in the proportion of listening that is digital**

**iii) future trends in revenue and costs of the INR licences**

**iv) start-up costs associated with the new entrant and**

**v) the duration of the renewed INR licences?**

**If not, please explain why not. If you disagree with our proposal to base our valuation on an assumption that each INR licence will endure for the full five year term, please also explain how, and on what basis, you consider we should take account of the uncertainty in respect of the duration of the renewed INR licences in our the licence valuations?:**

NO see comments above

**Question 4:Do you agree that a nominal, pre-tax discount rate of 11.0% is appropriate? If not, then please set out what other considerations Ofcom should have taken into account in determining the discount rate.:**

NO see comments above

**Question 5:Do you agree with our proposed approach to setting financial terms? If not, please explain why not and set out what you consider would be an appropriate split between PQR and cash bid. :**

NO see comments above