Title:			

Name and title under which you would like this response to appear:

Mr James H Robinson

## Representing:

Self

## What are your comments on these proposals?:

- 1.1 I would agree with this as it would make perfect sense as DAB becomes more popular and commonplace.
- 1.2 If formats are to be alligned in analogue and DAB, the details should be as detailed as possible, so as not to confuse any listener who may wish to complain about a violation if necessary.
- 1.3 If OFCOM was to give guidance for minimum local content criteria, it would open the door for any local station to have networking at certain times of the day or night, with the service provider given the green light to provide the minimum local content where possible, as an excuse to save money. If this is to happen at all, the current arrangements for a minimum of 4 hours of local programming in 24 (eg in the cases of some MW stations) should be increased to a minimum of at least 13 hours, so that more than 50% of any local station's output is guaranteed to be locally sourced. An additional three hours of networking should be allowed on Sundays to enable chart shows to be broadcast as now, or other network output where appropriate. Anything less than this would not serve the public good. Stations who wish to provide 24 hours of locally sourced programmes should be entitled to do so as now.
- 1.4 If the government of the day did chagne regulation in respect of local content provision, I would agree that there should be a minimum amount of local content on all stations within a digital multiplex as well as for current analouge stations. If not, once digital becomes the norm, it may result in quasi-national stations appearing in local multiplexes, with no requirement to vary the content in different areas. This cenario would not necessarily be suitable in all areas. If DTT and Satellite were left out of this provision, it would allow station owners not to provide local radio on local television transmitters, or on satellite. This would not be suitable in fringe areas where DAB may not be received satisfactorily, so satellite and DTT should be included if this suggestion was to come in by legislation.
- 1.5 If Government were to change the rules in respect of format restrictions on analogue national radio, it should only be done if it meant formats currently on alaogue radio were maintained, with digital providing a wider choice as now so as to boost sales of digital radio.
- 1.6 I agree with this proposal. There is no need to change this.