Additional comments:

The continued health and growth of broadcast radio services in the UK is dependent on an ability to remain relevant to it's potential audience. That audience is exposed to a growing range of services online and a wide range of ways to sample and experience those services from a ever growing range of devices. The world in which Broadcast Radio exists is hugely different from that which existed even 12 months ago, as the speed of change is increasing. The advent of services like Spotify, and it's growing listener base along with the prospect of a future anticipated Apple streaming service present a challenge for Broadcast Radio, unprecedented in it's history. It is vital for radio's continued existence as a listening choice for any potential audience, that the out of date music format restrictions don't prevent it from competing with the future threat from such online services.

The future with an Apple Watch, iPhone and Carplay ecosystem which is restricted to Apple's own services only, and excludes Broadcast Radio is a reality which is very serious for the future survival of the industry. It is vital for it's continued existence that those Broadcast Radio services have the flexibility to provide music output that will engage and entice listeners without a set of music format restrictions which are not relevant to the competing available streaming services within the enclosed Apple ecosystem.

Without the removal of such restrictions, Ofcom could be left regulating a set of services which would be in some serious decline- effectively re-arranging the deckchairs on the deck of the Titanic instead of assisting the avoidance of the approaching iceberg!

Ofcom would be giving Apple and other providers a commercial advantage by retaining the music format restrictions.

Question 1a: Which of the three options outlined in this consultation document, if any, do you consider would best meet the needs of both listeners and licensees? Please explain the reasons for your view.:

Option 3, in a world where music services and options are ubiquitous online and via mobile devices would seem the best option. It is incredibly restrictive to consider a limitation entering on anything more restrictive when you look at the freedom and lack of restriction applied to competing services availably to listens from any given online offering. Without at least option 3 being applied, it would seriously hamper broadcast services to compete with the likes of Spotify or and future Apple offering, preventing and endangering the future growth and stability of the broadcast radio medium. In terms of how long after a licence award any organisation should be restricted to the "beauty parade" promises which lead to the licence award in the first place, anything longer than a year after any award would be very business restrictive. Imagine any other industry or commercial company where the restrictions placed upon the output of that company were based not upon the market conditions, but on promises made years ago. It should be incumbent upon the regulator to see through the puffery and promises attached to any licence advertising process, and distil the contents to a basic core provision when deciding on the award.

Question 1b: Do you agree with the simplification of descriptions we propose under Option 2, and classifications we propose under Option 3? If not, please explain the reasons for your view and provide alternative wording.:

I think Ofcom should keep these under review, since what might seem sensible now, such as "Pop" or "Rock" are genre descriptions which can be altered and changed over time with the change of music over time. What might appear "pop" today could be something else tomorrow. The growth of "Brit pop" a few years ago would fall foul of such restrictive genre descriptions and could prevent broadcast radio services from moving with the audience because of those further overly restrictive genre descriptions.

Question 2: If you think there are other options which would be consistent with the statutory framework, please provide details and explain the reasons for your view.