

To whom it may concern:

I submit this response first and foremost as a Londoner, having lived in the area since birth and throughout my life. I also do so as a passionate supporter and advocate of local television in the UK, having been associated with the broadcasting industry for many years, done some advisory work as a disability consultant to Comux UK, and also been pro-actively associated with several of the bidders for local channel operator licences at the bidding stage including London Live themselves. As part of this, as can be seen from their bid document on Ofcom's website, I was promised an advisory role with the channel in the event that the bid were successful. However, shortly after the bid was successful I was informed by senior executives that London Live no longer wished to employ me or any advisor on disability issues. Additionally I was told the channel's approach would be non-discriminatory on any basis with regard to any of the channel's content. Furthermore it would be up to organisations or individuals to approach the channel with any content ideas or material, there being little intention on the part of the channel that it be proactive in this regard in its own right.

I would like to draw Ofcom's attention to an article I wrote which was published in Broadcast magazine on July 31st 2014, and is available online at <http://www.broadcastnow.co.uk/opinion/ofcom-must-be-brave-and-revoke-london-live-licence/5075746.article/> (a text copy of the article is provided below as Appendix 1 for convenience). This sets out my main arguments for being opposed to London Live's request to reduce their local programming obligations, the purpose of this consultation, and has been described by one television broadcasting industry executive who contacted me as "saying all that has to be said!".

A local television channel should surely aim to reflect the rich diversity and multitude of different interests of the general population within its catchment area, regardless of demographics or background. Its role should be to serve the community's many needs and interests, whatever size the minority or majority groups involved, whether these be representative of local Government, business and industry, voluntary organisations or even individuals. Building community support, let alone a credible audience for such a venture is bound to take time, possibly at least 2-3 years, and require some form of committed community dialogue and interaction on the part of any local channel operator. Given all these factors it is always going to be highly improbable that a local television channel is ever going to attract the kind of mass audience numbers that London Live management already appear to be expecting.

I note and welcome the announcement by London Live's management within the last week that the channel is to switch the basis of its content from entertainment to news and factual, and its target market from youth the 25-44 year old demographic. However, having also read an article in Campaign Magazine (<http://www.campaignlive.co.uk/news/1307558/>) in which the Chief Operating Officer explains the changes, this appears nothing more than a knee-jerk reaction. The fact that he implies at the end of the article that he feels he has 6 months to dramatically improve the channel's audience and fortunes once again brings into question the real commitment of both management and the channel's main investor to the venture.

Ofcom should take note of the success of commercial local television in Belgium, the USA, Canada, Australia, Serbia, Japan and South Korea. Local television can similarly be a success in the UK, particularly in London and other major cities. However, this will only happen with the right level of support and commitment from respective channel operators and Ofcom alike.

If Ofcom were to endorse the proposal put forward by London Live and give the go ahead for a cut in daily local content, this would send out the wrong message to other local license holders and potential investors. This would also serve to undermine the prospects for the development of city based local television services in the UK, probably fatally.

In conclusion, I believe London Live's proposal does not serve the interests of a channel supposedly licensed as a local television service nor that of the nascent commercial local television industry as a whole. The key audience driver to local television is almost certainly to have more local content, not less! Furthermore, there is ample evidence to demonstrate that London Live both does not understand its audience or purpose, and is not committed to really doing so. Even if Ofcom were to approve their proposal, the investors and management are unlikely to achieve the revenue and audience figures they are targeting and will likely walk away from the venture within 6 months-1 year whatever happens. Ofcom therefore should not only reject this proposal, but act to revoke and re-advertise the licence of London Live in the best interests of both the people of London and the local television industry.

Many thanks for the opportunity to comment.

Yours sincerely



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Appendix 1

Ofcom must be brave and revoke London Live licence

31 July, 2014 | By Jonathan Kaye



Local station is not living up to its promise of community-led content, says Jonathan Kaye

With increasing incredulity, I read of London Live's attempt to persuade Ofcom to reduce the number of hours it is required to devote to local content – and that the regulator is publicly consulting on this possibility.

I helped London Live to bid for its licence, promising to assist it with disability issues and attracting the 1 million Londoners with disabilities, who collectively comprise London's largest minority audience (as Boris Johnson has stated), if it won. However, once it had won, I was then told that it thought it could do this for itself.

With programming that fails to appeal to, let alone focus on and attract, diverse minority audiences, I'm sure many would agree that it is little surprise that London Live is failing.

Building niche audiences that can attract advertising and sponsorship that targets that same audience should surely be the lifeblood of true local TV.

As a viewer, do I want to watch repeats of London's Burning? Or turn to a local London channel for factual, community-led and focused content, that highlights local news, events and information, as well as grassroots sport, cultural, ethnic and religious matters?

Entertainment should be supplemental to this and highlight fresh local talent. Production could be either in partnership with, and/or outsourced to, local community, governmental and other organisations. Local advertisers, especially small businesses, would also welcome the opportunity of exposure within the local footprint – something that is notable by its absence to date on London Live.

London Live won its licence because Ofcom, like me, believed that its backers were best placed to understand the communities and needs of London. Regrettably, the reality is that it is just rather good at the marketing and distribution of a local newspaper.

Far from allowing acceptance of a plan that makes a mockery of localism and London's interests, Ofcom must tell London Live that its vision has failed and simply revoke its broadcasting licence.

Jonathan Kaye is a disability inclusion and access consultant