

The ESTV proposed changes should be completely rejected. They won their bid on the basis of promises to fulfil Ofcom's mandatory requirements for a LocalTV licence.

As a result, they have received significant benefits, including privileged EPG positioning (on Freeview and Sky), and heavily subsidised access to premium Freeview capacity.

Their business plan was clearly either fatally flawed or fraudulently aimed at utilising the available privileges in order to fund yet another (unnecessary) broad-based general entertainment channel aimed at the lucrative London market.

Substituting "best endeavours" for the obligations they committed to negates the purpose of the whole LocalTV licensing process, and would set a precedent allowing every other LocalTV licensee to do the same.

If they cannot deliver, they should surrender their licence or it should be revoked.

Personally, I feel that the concept of a "Local London" channel is a contradiction in terms, given the size of London and a large mix of communities which have very little in common interest. What do Southall and Southend share in common interest? My suggestion would be that the licence is not re-awarded at all on a London-wide basis, but instead via multiple licences to regional parts of London where there is some coherence in the local community that would benefit from a "Local" channel of its own – if it can be viable.

LocalTV needs to be ultra low-cost, not necessarily 24/7 (impossible to commercialise), perhaps working with the (surviving) local newspapers for mutual benefit.

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