

Consultation response form

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| Consultation title | Localness on commercial radio |
| Full name | Mark Parry |
| Representing (delete as appropriate) | Self, Community radio worker |

Your response

| Question | Your response |
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| <p>Question 1: Do you agree that Ofcom's duty to secure 'localness' on local commercial radio stations could be satisfied if stations were able to reduce the amount of locally-made programming they provide? If not, please explain the reasons and/or evidence which support your view.</p> | <p>No. The consultation cites that "[a] listener should get a feel for an area by tuning in to a particular station" as a prerequisite for a station being perceived as 'local material'. It subsequently identifies "[l]ocally-made programmes are those made within a station's licensed area or, where Ofcom has approved an area relating to that station, that approved area". Localness on a 'local' commercial radio station is not merely an 'add-on' or a 'contracted hours' of forced 'local' content; localness is the thread of place, identity, views, opinions, locations, accent, dialect and branding all intertwined to create something which is undeniably unique to the area. The establishment of a permanent office in the region, the 'on-the-ground' promotion of the service and local familiar faces is what makes local radio unique.</p> <p>Ofcom has already pandered too much towards the large corporate licensees in exchanging the fundamental building blocks of 'independent local radio' for undeniably corporate, faceless and synthetic networked content. The feel of particular stations, for example the Heart and Capital networks, whilst financially benefitting the oversized music and broadcasting corporations, have lost any traditional link to their respective areas and many people do not realise these services are infact classed as</p> |

'local', rather thinking their station had 'closed down' and replaced with a non-regional London-based station.

If a local commercial licence is provided, accepted and contracted, the expectation from the point of view of both listeners and Ofcom is that the service provided is local. I have previously understood the requirement to network off-peak content, particularly in licence areas which are exceptionally small. However there are many, many stations (particularly those serving large metropolitan cities) which really should operate a fully local service to offer a local voice at all times and engage fully with the local social and commercial possibilities to provide an effective and profitable station. Instead, the large corporate station owners, knowing full well the financial potential of the large metropolitan stations, are lazy in their approach and have little incentive to provide more quality localised content as Ofcom cares not to protect it.

Many would argue the role of community-based stations, and I agree these stations are essential in sustaining a varied and community-level approach to broadcasting, notwithstanding the opportunities available to those starting a career in the radio industry. Despite this, we know that community stations are financially volatile, targeted to very specific audiences, lack commercial sponsorship and suffer from poor transmission footprints. The whole point of independent local commercial radio is to provide a popular, commercially viable set of stations which entertain their audiences, inform with local bulletins, have a clearly definable and visible identity and engage a wide target audience.

For example, as a late-20s professional, I grew up in North Wales within the Marcher Sound region (subsequently a GWR/GCap/Global property). The station, even when under some networked obligations, enjoyed popular support and listenership through the engagement of the local community in Wrexham and Chester, offering a mix of locally-produced peaktime programming, local

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| | <p>bulletins, but most importantly a successful brand which was promoted and integrated within many public events in the region. Its subsequent replacement with Heart, and its eventual pan-North Wales merger led to a weak, largely locally irrelevant station within the Capital network, which sees little to no local engagement as its 'area' is unsustainably large and any form of 'localness' across such an expansive region is worthless. With breakfast and drivetime shows single-crewed and a highly over-commercialised attempt at national broadcasting, any form of localness (such as features, phone-ins, community events, multi-presenter shows) are lost and the station is deemed 'not local'. The fact Global is allowed to advertise it as 'Capital North West and North Wales', despite the fact it broadcasts to <i>very little</i> of the 'North West', symbolises its ignorance of its licence.</p> <p>Local community stations such as Calon FM, Tudno FM, Storm FM and the former Point FM offered something which was more localised, however the general feel of these stations is that 'localness' is something targeted towards an older audience and the younger generations need not care about their community, as a strong 'national' brand with 'national' advertising and the ability to attract 'national' stars on radio shows is (in the viewpoint of radio corporations) all that they need.</p> <p>Whilst Bauer's network is clearly smaller than those of Global, their use of more localised names on the whole creates a better sense of local brand awareness, due to the longevity of their names and the strong attachment these stations have to definable, metropolitan areas. Whilst I understand this is a commercial decision, and Bauer is experimenting with changing this structure, more local people can identify such a station with a specific area, other than a brand merely simple as "Capital", "Smooth" or the old "Magic".</p> |
| <p>Question 2: Do you agree with our proposed amendments to the localness guidelines relating to locally-made programming? If not, please specify any amendments you think should be made instead (if any), and explain</p> | <p>No. I believe the current requirement of a locally-made breakfast show is essential and is not unreasonable to enforce on radio operators. As the peak-time broadcast, these shows currently benefit from the highest</p> |

the reasons and/or evidence which support your view.

listenership and as such are a beacon for localness through mentioning local places and events, local accents, local advertising and views which are specific to the defined area. Currently, most local commercial stations advertise in metropolitan areas based upon the talent of their breakfast teams, and emphasise the localness of them. They also usually benefit from popular social media outlets and are seen as the 'public face' of these stations.

I feel that drivetime is equally important in this respect, however breakfast is commercially the biggest winner for these stations. I think that Ofcom should continue to enforce the current mandated locally produced time of 7-10 hours per day, specifically including breakfast, for a station to be deemed 'local'. This is the only manner in which a commercial, popular station can have any sort of local relevance and enrich the lives of those who live in the licenced area.

The decline in other forms of local media such as newspapers, the local TV network (which has collapsed catastrophically in terms of the 'local' mandate it initially expected to procure) and regional ITV has left local radio as the only popular and successful mode of localness. The concept of 'local radio', I feel, is not unviable nor unpopular; this view could be a result of the monopolisation of commercial radio and the subsequent neglect of any local or heritage aspects of that station, leading to a decline in quality, listenership and ultimately commercial value. Independent commercial local radio stations generally fare better due to the factors of a) greater local awareness and production, but also b) reduced overheads from large, national operation and corporatism.

Community radio cannot offer what independent local radio can, and that is local commercial opportunities for businesses and events who are looking for engagement with a large and broad listenership, including the young.

Question 3: Do you agree with our proposed new approved areas? If not, please specify any alternative proposals you think should be considered (if any), and explain the reasons

No. These areas are entirely unacceptable.

The fact Ofcom is calling these "areas" is an

and/or evidence which support your view.

understatement. These are *regions*; regions have no form of local concept about them.

Returning to the example of North Wales area. Under the new proposals, programmes in the North would be perfectly acceptable being made in the South (i.e. Cardiff). It is extremely widely known that North Wales is highly interlinked with Merseyside and Cheshire; most locals visiting, working or having relatives either side of the border. The road network is designed on an east-west axis. The rail network is designed on an east-west axis. Most people's preferred local ITV region is Granada, and all radio stations from Liverpool, Manchester, Lancaster, Chester, Shrewsbury and Stoke are entirely receivable in full FM stereo quality throughout North East Wales.

The reality is however that the North has very few links with the South. Despite linguistic, cultural and political links, North and South Wales are entirely separated and have no meaningful infrastructure linking them together. Many people in the North have never visited South Wales, and vice versa. Places in the South Wales Valleys would be entirely unheard of in the North, and a Cardiff traffic report would be far less useful to somebody living in Llandudno or Bangor, a good 4 to 5 hour journey away from the capital. 'National' commercial radio for Wales has been trialled before (Real Radio) and failed, and Ofcom noted the irrelevance of a Wales-wide service as being 'local'.

I recognise that similar arguments will be made in all of the 'regions' Ofcom has created; there is absolutely no relevance in maintaining a local service in a 'regional' set-up, which will ultimately achieve the goal of the national corporations; national, local-less commercial stations which pander to corporate commercialism in attempt to snuff-out competition. Global's recent purchase of Lakelands Radio and The Bay in the North West shows the complete disregard the organisation has for local listenership by instantly disposing of the name and many of its staff, from a service which was previously award-winning. Around Liverpool, the purchase of the

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| | <p>alternative dance-focused station Juice FM and the transformation into Capital has been seen as many as pointless, as Capital 'North West and North Wales' (ex- Wirral's Buzz 97.1) broadcasts entirely to the area and has undeniably reduced radio choice to people in the local area and beyond. Whilst I recognise UTV's ownership of Juice was not commercially successful, there were several compromises that could have been made to sustain the 'localness' Juice offered and provided a better financial return rate. It is in a case like Juice's where I recognise that off-peak networking can be important to sustain quality peaktime programming.</p> <p>A final example is that of Smooth 'Wales', i.e. the AM service of ex- Red Dragon FM and Marcher Sound. The fact this station is exclusively available on AM and only broadcasts extremely limited local programmes demonstrates Global's lack of care for these two stations. With both stations sharing facilities in Cardiff, the relevance of any meaningful 'localness' is reduced, as the North has effectively lost any form of local, 'oldies' station that was previously provided by Marcher Gold / Classic Gold. North Wales is already fully provided by Smooth North West in FM; I often wonder who is listening at all to a poor-quality AM station with third-rate local programmes at irrelevant times.</p> |
| <p>Question 4: Do you agree with our proposed amendments to the localness guidelines relating to local material? If not, please specify any amendments you think should be made instead, and explain the reasons and/or evidence which support your view.</p> | <p>No. I believe the current requirements of the 2010 review are suitable and strong enough to maintain a local service which has commercial opportunity and fulfils the initial premise of independent local radio.</p> <p>Ofcom has identified research which has the implication that local radio listeners were indifferent on localism in breakfast and drivetime shows. I should suggest here that this survey was undertaken within the context of a local radio set-up where these shows are locally-produced. Whilst I do not wish to speculate, it could be likely that any change to this format could be extremely noticeable to the local listenership and lead to a dip in</p> |

listening, as had been witnessed with some of the changes to the Capital network, particularly in Scotland. What is not commented on in the consultation document is the higher regard listeners have for the presenters, which are of course, undeniably local. From my perspective, Ofcom's consultation document reads with a strong bias and is sympathetic to the corporate owners of local stations, in a similar fashion the way in which it eroded any form of locality within ITV. The fact is clear for me that these corporate bodies acquired *local* stations from *local* owners on *local* licences; the respect these stations have enjoyed is stripped out entirely as the ultimate goal (for both the corporations and Ofcom) is an entirely national, local-less service.

The other alternative however is the possibility of stripping these large multi-station owners of their local licences, offering them a national licence with no local requirements, and offering better support, coverage and commercial opportunities to what are currently 'community' stations. Whilst I personally prefer the status-quo due to the commercial opportunities the 'local-with-networking' model offers, I do not think I will be listening to stations in the future which have been hollowed out by a regulator who works at the beck and call of large conglomerates who have absolutely no interest in local licences.

As for DAB, Ofcom and its predecessor have of course allowed for that to be a free-for-all, dominated by those players who can afford the luxury most at the expense of quality and variety. A huge proportion of local stations do not appear on DAB and the prominence large players have on their national stations (such as Bauer networking Key 103 as 'Hits Radio' and Global's version of 'Capital UK') shows their lack of vision for local stations or even a fully localised network. A local FM licence should ultimately equate with a local DAB service, however of course the market forces outmode what is a public service which needs to be protected.

AM is problematic as radios phase-out the medium band in favour of DAB/FM, but one

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| | <p>positive enhancement over the last few years on the AM band has been the re-invigoration of Bauer's ex-Magic AM stations into more localised, local-branded 'Greatest Hits' network. Whilst I am not in the target market for these stations, I understand the impact this has made has been very positive and has bolstered the local support of the local brand as a consequence (hence Bauer's reluctance to remove the 'Key Radio' name from Key 2). I think opportunities could arise for the AM band in the future with DRM, however there is a reluctance elsewhere to invest in AM local commercial licences and subsequently any local attachment these stations once had is becoming forgotten (e.g. Gold Manchester, Smooth Wales etc). Perhaps the AM band could be more suited to RSL and Community stations at a reduced rate in order to provide local choice and value for money.</p> |
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