

Your response

Question	Your response
<p>Question 1: Do you have any comments on Ofcom's proposals to make more frequencies available for restricted services?</p>	<p><i>Is this response confidential? – N</i></p> <p>We welcome more FM spectrum availability for RSL's and LRSL's. As well as the removal of the restriction on antenna height which we would have struggled with as many suitable NHS buildings are above the previously allowed height. The allowance for an increase in power if required is also very useful, something we have benefited from in our trial. We do however have a concern that you suggest there would be a frequency change, which is something that unless we see is of great benefit to us and other broadcasters (due mainly to interference), we see this a negative and not something we support, due to the incurred costs and effort of re-branding and potential loss of audience. As a very small charity (and maybe typical of LPFM licence holders), this is not a minor inconvenience. We would look to hand back our LPAM licence and transmit on LPFM instead, something we hope can happen sooner rather than later.</p>
<p>Question 2: Do you have any comments on Ofcom's proposed restricted service standard form Broadcasting Act licence?</p>	
<p>Question 3: Do you have any comments on Ofcom's proposal to issue existing extended duration SRSL licensees with a restricted service licence on a new frequency at the end of their existing licence term, should they apply for a new licence?</p>	<p><i>Is this response confidential? – N</i></p> <p>As mentioned in Q1, we do object to being assigned at new frequency at renewal. For very small charities like ours, the cost, time, and effort to deal with the change to branding (both audio and visual), is something we don't need, as well as potentially losing audience as you move. It's not something that happens to other broadcast radio services with long term licences, I don't see why we should be open to this unless there is a very good reason that both Ofcom and the licensee agree on, like interference from a nearby transmitter.</p>
<p>Question 4: Do you have any comments on Ofcom's proposal to issue existing LRSL licensees with limited coverage frequencies (if</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>

<p>available) at the end of their existing licence term, should they apply to renew their licence?</p>	
<p>Question 5: Do you have any comments on these changes to our application process, as set out in the revised guidance at Annex 4?</p>	<p><i>Is this response confidential? – N</i> We find these changes very helpful, and as such have taken advantage of this, by our charity being able to hold our trial FM and current LPAM licence. It made no sense for a third party, who has no interest in the day-to-day operation of the licence to be the licensee. This also ensures a better and more timely communication experience between Ofcom and the licensee of the radio service.</p>
<p>Question 6: Do you have any comments on Ofcom’s proposal to invite the Secretary of State for DCMS to consider making an order which would provide an exception for certain services from the need to hold a Broadcasting Act licence?</p>	
<p>Question 7: Do you have any comments on Ofcom’s proposed fees for restricted services?</p>	<p><i>Is this response confidential? – N</i> Whilst price rises seem to be inevitable in any walk of life, certainly the significant jump for FM fees feels extreme. It needs to be remembered in a lot of cases, this isn’t about a money-making exercise but to cater for the needs of people that aren’t served by existing services, and therefore money is an object. Together music royalty costs, it feels like we are being treated like a commercial broadcaster which is unfair, as most barely generate via fundraising enough money to cover these costs, especially post covid, where our usual fundraising means have been greatly reduced.</p>