Kerr, Mr

**Consultation question:** 

Should regional radio station Capital FM (Scotland) be permitted to make the changes to its Character of Service as proposed with particular regard to the statutory criteria as set out in the summary? (The Broadcasting Act 1990 Section 106 (1A) (b) and (d) relating to Format changes).

These changes should most certainly not be allowed, as it clearly makes fundamental changes to the original format licensed by the appropriate authority when Beat106 (BeatFM) were initially granted the license. One of the losing bidders at the time were I believe Capital Radio Group (now part of Global Radio) who subsequently just effectively purchased the license by buying BeatFM. Clearly the authority at the time made the decision that the format proposed and granted was preferable above any other.

Given the constant rebranding and formatting of the station, Beat106/Beat106 (under Capital)/XFM/Galexy/Capital FM, and the subsequent amount of networking that came along with each rebrand/reformat, it would appear that Global Radio now want to completely deprive the listeners of Central Scotland of the little remaining diversity that the current license guarantees, particularly in the area of specialist and non mainstream output. The reduction of 54% in the specialist output is completely unacceptable.

For Global to compare their Yorkshire playlist to that of the Scottish Bauer stations is at best described as disingenuous. I note that they compare a Top100 playlist rather than the heavy rotation Top 30 format that they appear to employ on their daytime schedules. Ask the average listener to describe the daytime output of Radios Forth1, Clyde1 and Capital Scotland, and you can guarantee the broad response to all three stations would be Top40/Pop Hits.

Whilst I accept that daytime output will continue to be broadly Top40, Global must be forced to retain what little specialist output they currently attempt. My own opinion is that they currently pay little more than lip-service to this condition, and ofcom should ensure that they more strictly comply with this condition. The license which was originally granted was given to enhance the diversity of listening available to Scottish listeners, and whilst times have changed this format change should be prohibited on the grounds that it reduces diversity rather than enhances it, which was clearly the reason the original format was granted.

I strongly request that this application is refused, and look forward to seeing the other responses, and the correct decision being made by ofcom.