

Name Withheld 1.

Consultation question:

Should regional radio station Capital FM (Birmingham) 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).

In one word, NO.

The new format would significantly reduce programme choice in the Birmingham area as the proposed new format would lead to greater musical overlap between Capital and BRMB and even between Capital and Heart with less urban music and more mainstream 'pop.'

The format change is unfair to Orion's rival station BRMB which also plays a significant amount of rhythmic music. It would lead to two rival stations targeting very similar audiences while neglecting a significant and growing number of real urban music fans who do not want to hear mainstream pop and dance on a station that is still supposed to be a specialist music station for fans of rhythmic urban music.

There was a time when there was little or no overlap between music heard on 102.2FM Galaxy/Choice and 96.4FM BRMB.

Despite living in an iPod generation where musical tastes are more diverse than ever before, radio is going in the opposite direction in Birmingham with 3 stations (Capital, Heart and BRMB) all sounding more similar than ever before with more songs in common than at any time in the past.

There would also no longer be anymore specialist shows on Birmingham-wide FM stations playing reggae, hip hop and RnB. The proposal says the station will continue to appeal to listeners of African and Afro-Caribbean origin, as it always has done. This is absolutely not true. The station no longer appeals to listeners of African and Afro-Caribbean origin as it is at the moment.

The proposed change would lead to an even greater demand for illegal pirate radio. Fans of urban music are more likely to access pirate radio on FM than the urban stations on DAB suggested in the document.

The format change would lead to a significant reduction in range of programmes available on analogue independent radio in Birmingham. There is no clear benefit to the listener in Birmingham with the proposed format change as what is proposed is already provided by other local and national stations available in the area.

Though there may be a demand for mainstream rhythmic music on the radio, this must not be at the expense of any rival station that is already providing such content.

It is also not acceptable to make reference to Choice on DAB as an alternative for listeners of African or Afro-Caribbean origin as Choice is a truly London station and never mentions its out of area DAB listeners on air. Furthermore, there is nothing to stop Global from removing Choice from the West Midlands DAB multiplex as it is not required to be on there. It could be replaced by a non-urban station without any notice.

It is also not acceptable to use the presence of BBC Radio 1Xtra as an argument for no longer serving listeners of African or Afro-Caribbean origin as this is a national service whereas Capital is licensed as a local service for Birmingham.

The proposed format change would reduce choice very significantly and would create a gap in the marketplace.

There would effectively be no station for listeners of African and Afro-Caribbean origin to listen to on analogue in Birmingham if the format change is allowed.

Capital must continue to serve listeners of African or Afro-Caribbean origin and must do so much better than it is currently doing. At the moment, the station barely sounds like a station for listeners of African or Afro-Caribbean origin, hence the reason why pirate stations 97.5 Stingdem and 92.0 Hot FM have been successfully broadcasting to listeners of African or Afro-Caribbean origin in Birmingham for over a decade.

The whole point in the station on 102.2FM was to provide a different type of output to that heard on BRMB. The new format is too vaguely worded and in theory could lead to Capital Birmingham sounding too similar to BRMB. They already both take the same programme on Sunday afternoons between 16:00 and 19:00. Given the number of stations available city-wide or county-wide in Birmingham, the choice of music available on legal local radio stations in Birmingham is very poor compared with other cities containing a similar number of stations.

For the reasons above, the existing license must not be allowed to be changed. The format change must be rejected as it simply designed to ensure as many BRMB listeners as possible retune to Capital as the new Top 40 music station for Birmingham. This is the main reason for the format change.

The existing format would be much better met with the current Choice playlist. It would make much more sense if Global replaced 102.2 Capital with its sister station Choice, maintaining the current local hours and taking networked programmes from the London Choice station at other times.

I would advise that Ofcom immediately reject the format change for Capital Birmingham and furthermore insist that the station is not currently meeting even its current format obligations, and that it must do more to better serve listeners of African and Afro-Caribbean origin.