

Title:

Forename:

Surname:

Representing:

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep part of the response confidential

If you want part of your response kept confidential, which parts?:

Name, email and organisation.

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Organisations such as ours have only had 5 years of continuity at a time. Though we have not feared that our licence would be revoked, we are now living in a time that seems to us much more relative. We want security in operations, as our budget is massive compared to our reserves (which is null) - I don't know when we're next allowed to apply for this 7-year extension and I don't know when we're next allowed to (if we will ever be) apply for transition from AM to FM as we've been seeking to do for a long time. This insecurity makes our finances unstable and undermines the 'benefit to radio and customer' that you want to try and save - though it is less insecure than some of the alternatives. Are you able to promise us security in transition?

Question 4.1 Do you agree with our general assessment of the relationship between licence length and economic viability? If not, what other evidence should we consider?:

Our finances are stronger with more years of security - and weaker with less. Though we have 5 years of licensing remaining, our financiers are wary that OfCom can cut those 5 years short and as such aren't happy. License length - and security thereof - are paramount to economic viability.

Question 4.2: Do you agree with the criteria against which each of the options will be assessed? If not, what are the additional criteria that we should take into consideration, and why are they relevant to our analysis?:

The importance of the individuals controlling the DAB in the region is essential - in areas where DAB is still yet to come online or includes only a couple of services, it is not a viable alternative. Those of us who have been seeking to get on digital radio, in any way, for years and are yet to do so seem to get penalised by the pro-digital reforms, even though we cannot do anything more than we have. We need more pushing of digital and less hindering of analogue!

Question 4.3 Do you agree with our assessment of the common end date option? If not, what additional factors should we take into consideration, and why are they relevant to our analysis?:

A common end date would be the best thing, in my opinion, if digital radio services could be secured. If an end date of 2022 were chosen (for example), it would give 12 years to convert all radios in all vehicles, houses and mobile phones converted - which in my mind is ample time. I, personally, and not on behalf of my organisation, think that this is the best idea. My organisation thinks that digital radio is a 'shit' idea and wants to stay on analogue forever, because digital radio isn't suited to our kind of station.

Question 4.4 Do you agree with our assessment on the full twelve year option? If not, what additional factors should we take into consideration, and why are they relevant to our analysis?:

Question 4.5 Do you agree with our assessment of the fixed licence length option? If not, what additional factors should we take into consideration, and why are they relevant to our analysis?:

I disagree - though I think a fixed length is preferable, it is simply impossible as different areas have different contributing factors. I think that 7 years is a good minimum factor and 12 years a good maximum length, depending on other circumstances - but, again, we're not able to get on DAB despite persistent effort and feel that we shouldn't be penalised for it!

Question 4.6 What are your views on the differential option example we present above? Are there any other criteria you believe we should examine in considering a differential approach?:

Question 4.7 Do you agree with our preferred proposal on the approach and length of re-advertised licences? If not, what are the additional factors that we should take into consideration, and why are they relevant to our analysis? What is your preferred approach and why?:

See above.