

**Title:**

Ms

**Forename:**

Usha

**Surname:**

Parmar

**Representing:**

Organisation

**Organisation (if applicable):**

Sunrise Radio (Yorkshire)

**Email:**

X

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

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

**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

**Comments:**

**Question 1: We welcome any further evidence on our assessment of the media economic landscape, including key examples of international regulatory best practice that you believe may be relevant to this review:**

**Question 2: We seek views and supporting evidence on our recommendation to remove the local radio service level ownership rules.:**

We feel on the surface that we can support the removal of the local radio service ownership rules but with the proviso that 'local' should be re-examined with target audience incorporated into the definition of local. For example a city where there is a myriad of stations but only two local commercial Asian stations the latter are owned by one person now in terms of numbers this is not classed as breaking the rules under the current Ofcom system however when you look at the target audience solely the Asian Community ? they have but one ultimate source for their radio choice.

**Question 3: We seek views and supporting evidence on our recommendation that the local cross media ownership rules be liberalised.:**

We can understand and support a call to liberalise local cross media ownership but not without conditions. For example a city where there is only one local newspaper and one local radio for instance then this should not be allowed, similarly should there only be one newspaper, one radio and an internet service then ownership of the paper and radio should not be allowed as the internet provider has a disadvantage and not like for like strength of competition.

As pointed out in our response to question two, the definition of local needs to be re-examined i.e. to incorporate target audiences.

**Question 4: We seek views and supporting evidence on our recommendation to retain the national cross media ownership rules.:**

In answer to this the same principle as discussed in questioned three should apply for national.

**Question 5: We seek views and supporting evidence on our recommendation to remove the national multiplex rules.:**

We believe the removal of national multiplex rules could create a carte blanche for monopolies and unfair competition.

National multiplexes would normally be owned by 'big boys' and they could dictate who the programme providers would be possibly to the detriment of innovative newer operators favouring existing relations.

**Question 6: We seek views and supporting evidence on our recommendation to retain the restrictions on broadcast licenses.:**

**Question 7: We seek views and supporting evidence on our recommendation to retain the appointed news provider rule. :**

**Question 8: We seek views and supporting evidence on our recommendation to retain the media public interest test in its current form.:**