

Comments:

I have listened to local commercial radio since the 1980s and have witnessed major changes to local commercial radio since that time. Back in the 1980s and the first half of the 1990s many commercial stations were live and local throughout the day 7 days a week extending this to 24 hours a day during the 1990s. Since that time there has been major consolidation and successive cost cutting in the commercial radio industry. It is now clear to me as a listener that many commercial broadcasters now provide only the minimum amount of local programming required by Ofcom to fulfil their licence requirements and would like to provide less. There have been numerous consultations and concessions made to the UK radio industry over the last 20 years and each time the amount of local programming on the radio has decreased. I have therefore come to the conclusion that whilst local radio is important to and valued by many listeners it is no longer desirable and is too costly for commercial broadcasters to provide it. I therefore believe that the future of local radio lies with the BBC and not for profit community broadcasters who are not under any obligation to maximise profits for shareholders and investors at the expense of local programming. I therefore believe that Ofcom's proposals do not go far enough for the commercial radio industry and that it is now time to take radical action to completely deregulate the commercial radio industry, whilst at the same time ensuring that not for profit community radio is an adequate and sustainable replacement for local programming no longer provided by commercial broadcasters and fulfils the original vision of ILR by providing a local alternative to the BBC. Otherwise I feel that further consultations and deregulation of the commercial radio industry will inevitably need to occur over the next 5 – 10 years but the end result will be the same.

Proposal 1: Regional stations allowed to share programming to become national stations.

I agree with this proposal however there should be no restrictions on the amount of programme sharing either networked or automated between any commercial radio stations of any size – that includes all commercial radio licences not just regional stations. The only way that commercial radio can compete on a level playing field with BBC Radio 1 and BBC Radio 2 is to be given the option of being able to provide national programming including at weekday breakfast and drive and weekend / bank holiday breakfast when the majority of people are listening. Currently the only example where there is fair competition between the BBC and Commercial radio on FM is BBC Radio 3 and Classic FM. Allowing commercial stations to share national programming at peak times would allow them to have high profile presenters and guests and would provide alternatives to BBC national radio. Where stations are required to have regional content however regional information updates should be inserted into networked shows – see response to Proposal 6.

This does not necessarily mean that all commercial radio stations will automatically become national networks. It may turn out to be more profitable for networks to provide some regional programming because a regional programme attracts a larger audience than a high profile, big budget networked show and a national network cannot compete directly with a station that opts to provide local programming throughout the day. High profile networked shows have sometimes been less successful than the local programming that they replaced in the past so it may prove advantageous for commercial broadcasters to retain some regional programming each day.

In the future the current “beauty contest” method of awarding licences should be abandoned for commercial licences and all commercial licences should be awarded to the highest bidder. This will ensure that licences are only awarded to commercial broadcasters with sufficient financial backing and a strong viable long term business plan. This would be an additional and welcome source of revenue for the UK government. The money could then be spent on essential public services.

Proposal 2: Creation of a new national multiplex from existing regional multiplexes.

I agree with this proposal, however I believe that all local and regional DAB frequencies should be used for national broadcasting in DAB+ from 2020. DRM+ should be introduced as soon as practicable and this should be the mode of digital broadcasting for all local and community stations from 2020. The current proposals where local and community stations are left on analogue FM after 2015 whilst other stations switch to digital is unsatisfactory. There should be a single switchover date in 2020 where all analogue radio signals in the UK are switched off together.

The digital switchover date of 2015 I feel is unrealistic and is very likely to end up being put back. Instead there should be a complete switchover from analogue AM and FM and DAB MP2 broadcasting to DAB+ and DRM+ in 2020 I.e all analogue AM and FM signals and digital broadcasts using the now superseded MP2 DAB technology in the UK are switched off during that year. This would allow a 10 year publicity campaign ending in a date that is easy to remember I.e from 2020 people will no longer be able to listen on an analogue or non upgradable DAB MP2 receiver. 10 years is an acceptable timescale for those who have an analogue or non-upgradable MP2 DAB radio to replace their radio. For those who do not wish to replace their analogue radio, there are already devices on the market that can convert a digital signal to a signal that can be picked up on an FM radio.

Once each area in the UK has local / regional and national MP2 DAB coverage, Ofcom should not award any additional frequencies that may become available for broadcasting in DAB MP2. Ofcom should instead take the opportunity to use any additional frequencies that become available for DAB+ broadcasting including the now spare 2nd national DAB frequency. From 2010 the UK government should take steps to ensure that all future radios sold in the UK are capable of receiving DAB+ as well as DRM+ broadcasts. In 2020 following more than 10 years of DAB+ capable receivers being on sale and 10 years promoting DAB+ all digital stations should cease broadcasting in the old DAB MP2 standard and switch to DAB+.

At the same time provided that receivers capable of receiving DRM+ broadcasts have been available for a minimum period of 10 years, all local and community FM stations should cease broadcasting in analogue and begin broadcasting in DRM+ This would mean that by 2020 the UK is once again at the forefront of broadcasting technology and isn't left at a disadvantage when compared to other countries in terms of the number of stations that can be broadcast or audio quality. Any remaining AM stations would switch to DAB+ or DRM+ at this time depending on whether they are relays of national networks or local / community stations.

Ofcom should set a standard that no station consisting of 50% or more music may broadcast in less than 128 KB/s on DAB or equivalent audio quality in DAB+. Stations consisting of more than 50% speech output should continue to be permitted to broadcast at a lower bitrate.

Proposal 3: Co-location within a new set of defined areas.

There should be no co-location restrictions for stations that are permitted to network all of their output nationally 24/7 provided that the broadcasts originate from the UK. Where stations are required to provide regional content as part of their output co-location should be allowed anywhere within a wider UK region. The Ofcom regions are too small and do not appear to make a great deal of sense in terms of regional sense of community or geography. As far as listeners and advertisers are concerned Ofcom's regions will be meaningless. Instead it would make far more sense to define co-location by the UK government regions for the UK with co-location being permitted within any of those wider regions. London stations should be permitted to co-locate anywhere within the London digital region.

Proposal 4: Programme sharing within the newly defined areas.

All commercial stations should be allowed to network their programmes nationally across the UK 24/7. Stations which are required to provide regional content as part of their output should be permitted to programme share that regional content across the region in which they are based. The regions should be defined by the UK government regions in England and the nations. This effectively means that existing regional stations could become fully national 24/7 and existing local stations could combine into a network consisting of 12 regional stations in the UK. The size of networks will of course vary from two neighbouring local areas to quasi national networks to national networks covering every region of the UK depending on ownership etc.

Ofcom should require that those broadcasters who opt to network their programming are open and honest with their listeners. There should be no attempt made on the part of broadcasters to hide the fact that a programme is networked and Ofcom should require commercial broadcasters to have an announcement every hour that a programme is networked e.g, "Across the UK this is". During competitions there should be an announcement stating how many listeners the network is broadcasting to based on the latest RAJAR figures. "Across the network" is meaningless even misleading to many listeners.

Proposal 5: Mergers of local multiplexes.

Ofcom should look at merging all local and regional DAB multiplexes by 2020 into national multiplexes with DRM+ introduced for local FM and community stations. This would significantly increase listener choice on the DAB platform and would make DAB and in future DAB+ much more attractive to listeners. Allowing local and community stations to broadcast in DRM+ would allow these stations to switch to digital and cover smaller areas without the costs incurred of getting onto a regional multiplex. At the moment there are national or quasi national networks broadcasting on local or regional DAB frequencies which is an inefficient use of spectrum. These should be broadcast on national multiplexes at the first opportunity.

Proposal 6: An enhanced news option for local FM stations.

By 2020 there should be no requirement for local news or any other local content to be provided on commercial radio. By 2020 the combination of BBC local / regional radio, community radio and local news / information websites also available on mobile phones should be sufficient to relax this requirement on commercial broadcasters. As yet however many areas still do not have a community station and BBC local radio coverage and local news websites are also patchy with many areas not adequately served. The UK government should ensure that a proportion of the BBC licence fee is spent on setting up BBC local radio stations in those areas yet to receive their own dedicated station and that BBC local radio both reaches and is reflective of a wider audience I.E not just the over 50's.

Therefore I agree that until then Ofcom should require that regional news, weather and travel and other essential information is provided at least hourly on commercial radio during the daytime. Regional updates should consist of a minimum of 2 minutes regional news plus 1 minute for regional weather and travel. Commercial broadcasters that choose to network all of their programming, but are required to provide regional content as part of their licence should provide a minimum of 6 minutes of local content per hour excluding adverts and promos on the hour and half hour at peak times and 3 minutes of local content on the hour during daytime. The local content may be outsourced and broadcast from a regional broadcasting centre.

Those who wish to listen to traditional fully local programming can continue to do so via BBC local / regional radio and community radio and on any commercial stations that opt to provide it.

News, travel and weather updates are however currently non-existent on many networked programmes and Ofcom should require commercial broadcasters to provide national news headlines, national weather and national travel updates during networked programming. For instance if there is a major national story or a motorway is closed or a severe weather warning is issued Ofcom should require that this is mentioned during a networked programme.

Ofcom should not stipulate a certain number of regional hours each day. The amount of full regional programming on the radio should be purely a commercial decision not a requirement imposed by Ofcom. Provided that essential regional information is inserted into networked programming, there is no necessity for full regional programming to be provided. On some commercial networks local programming is already little more than localised versions of networked programming, it is not truly reflective of the areas that it serves and therefore is of little value to listeners in terms of local content. Also the fact that according to RAJAR, over 44 million people listen to BBC and commercial national radio and over 15 million people happily listen to the national breakfast shows on Radio 1 and Radio 2 alone, suggests that full regional programming even at peak times isn't important to many people. All that most people require and have time for is a quick informative update on what is happening in their area. Research apparently suggests that most people only listen to the radio for around half an hour to an hour at a time so there should be two regional information inserts on the hour and half hour at peak times and hourly during daytime. The current situation however where the majority of programming on stations is networked but commercial broadcasters are required to provide a certain amount of local programming each day from within a defined area is wasteful both in terms of money and resources and in terms of the amount of energy used by radio station premises and equipment standing idle much of the day. Instead commercial broadcasters should be given the option of broadcasting from 12 regional centres in the UK if they are required to provide regional information as part of their output or a single national broadcasting centre in the case of existing regional stations. Commercial radio companies should also be permitted to outsource all of their news, weather, travel and other regional content to other providers.

In the event of a major local emergency however a commercial broadcaster should either provide its own programming to listeners in the affected area - if a network does not provide regular local programming the broadcast may take place from anywhere in the UK but they must be in touch with people on the ground e.g. police, fire and rescue and put them to air. Alternatively a commercial broadcaster could relay an emergency broadcast from another commercial broadcaster or the BBC. Ofcom should fine commercial broadcasters who fail to respond in any way to a major local emergency whilst it is taking place. It is unacceptable that a station should be taking networked programming or be in automation with no mention of a local emergency.

In summary Ofcom should minimise regulation on localness on commercial radio with the view to phasing it out altogether at the digital switchover whenever that takes place and allow audiences to naturally regulate the amount of localness on commercial radio. If listeners are unhappy with the lack of local content on a station this allows rival broadcasters to seize the opportunity in exactly the same way as in the wider commercial marketplace where there are two products on offer and one is more attractive to consumers. This will improve competition in commercial radio and is likely to lead to a mixture of national networks and stations providing local programming as both have unique selling points to listeners and advertisers.

Ofcom needs to ensure that a thriving and sustainable tier of community radio is developed with as many community stations licenced as possible, as soon as is practicable. Community stations should

be allowed to take enough advertising and sponsorship to fully cover their costs at the first opportunity (it is wrong that when listeners already pay for the BBC licence fee they should then be asked for donations to help keep their local community station on air because it is not allowed to take enough advertising or sponsorship) and should be allowed to operate at higher power to cover towns, cities and rural areas by no later than 2020. Community stations should be allowed to take advertising and sponsorship provided that they do not attempt to compete with or try to emulate commercial stations, they must not be allowed to tailor any of their programming to the requirements of advertisers or sponsors as this would defeat the whole object of community radio and harm commercial broadcasters. In return for allowing commercial advertising and sponsorship to help fund community radio, commercial broadcasters should not be required to provide any more local content than is necessary.

Proposal 7: AM stations.

Commercial broadcasters should be permitted to close AM broadcasts and switch to digital as soon as they feel that they are no longer commercially viable. There should be no unnecessary regulation of AM broadcasts. Any vacant AM frequencies should be used for community radio wherever a suitable FM frequency cannot be found,

Proposal 8: Limited redefinition of contemporary music formats.

There should be no regulation as to the type of music programming or otherwise that a commercial broadcaster may broadcast. A commercial broadcaster should be able to choose to broadcast in whichever format they deem to be the most popular and profitable and provided that they notify Ofcom in advance they should be permitted to change formats as in the USA.

This could mean that a talk station could switch to a music format and an oldies station could switch to a Contemporary Hits format. Any commercial broadcaster that chooses to do so however risks losing listeners and revenue and rival broadcaster could then take advantage by providing the programming that the other station dropped.

A large number of digital stations however should ensure that a range of popular and niche formats are available to listeners – it is of no value for commercial broadcasters to duplicate a format on two or more of their stations as their stations would be competing for the same audience and it would cost perhaps twice as much as broadcasting the format on a single station, therefore there should be no reason for Ofcom to continue to define formats and require that stations adhere to a particular format. The internet, community radio and the BBC will continue to provide for niche formats and music programming which is not commercially attractive.

The only regulation of programming and formats that Ofcom should be concerned with in the future is that which is absolutely necessary to protect the listener e.g. taste and decency when children are listening and to prevent fraud (phone in scams) etc.

In summary I believe that it is now time to completely deregulate commercial radio. The ILR experiment of the 70s, 80s and 90s has failed due to the high costs of providing local programming leading to lack of profitability and Ofcom should now ensure that community radio fully replaces ILR and realises its original vision as a local alternative to the BBC. Commercial companies have a legal duty to maximise profits for their shareholders and investors. Ofcom should therefore do everything possible in its power to allow commercial radio companies to do the same by minimising regulation to only what is absolutely necessary, whilst ensuring that community radio fully takes the place of traditional local programming on commercial stations. That way commercial radio companies will be able to maximise profits and listeners will continue to be able to hear full service local programming via the BBC and community radio.