

## **Comments:**

The problem is that there are too many radio stations at the moment chasing too little money and some natural selection will have to take place. The plight of stations is not helped by the groups themselves taking on massive debts to fund expansion. That combined with a need to fund DAB as well is hardly helping matters. Did we license too many multiplexes too quickly?

There has always been a race to the bottom whenever companies/stations have merged, making the services cheaper to run seems to be the ultimate goal to satisfy the owners rather than the listener/viewer, Global Radio and ITV being two that come to mind. Should there be more consolidation allowed, to my mind no.

## **Proposal 1: regional stations allowed to share programming to become national stations:**

In principle this is okay so long as there is no regional content at all including adverts/sponsorship etc. on those stations. If broadcasters want to broadcast nationally they have to do just that, one service going nationwide. Otherwise you risk giving an unfair advantage to these services over smaller local ones

## **Proposal 2: creation of a new national multiplex from existing regional multiplexes:**

Again in principle this is okay so long as there is no regional content at all including adverts/sponsorship etc. on those stations via this National Multiplex. Otherwise you risk giving an unfair advantage to these multiplexes/services over smaller local ones.

## **Proposal 3: co-location within a new set of defined areas:**

Is this the be all and end all of solutions to the problems of radio stations at the moment? The smaller scale stations might benefit but the larger groups will just use it as an excuse to cut jobs.

## **Proposal 4: programme sharing within the newly defined areas:**

Is this the be all and end all of solutions to the problems of radio stations at the moment? The smaller scale stations might benefit but the larger groups will just use it as an excuse to cut jobs, and propose to combine services, e.g. the creation of Heart East Anglia/Heart Devon etc.

## **Proposal 5: mergers of local multiplexes:**

This indicates too many multiplexes were licensed in the first place. How do you keep a local station local on a merged multiplex when there are several stations with the same name in the proposed coverage area of the multiplex.

## **Proposal 6: an enhanced news option for local FM stations:**

Regulators should be very concerned with this area, stations are using a valuable resource and should be regulated because of this. No station belonging to a large group i.e. Global & Bauer should be allowed to produce less local output than they do currently, even if they offer local news during daytime. Local news is clearly an important part of the station output and identifies a local station to its listeners as being relevant to their area.

**Proposal 7: AM stations:**

Support this proposal, especially the Nation requirement.

**Proposal 8: Limited redefinition of contemporary music Formats:**

Removal of the music formats will in all probability lead to the underserving of certain age groups and musical tastes in the race for cash. Given these broadcasters are using a very valuable resource (i.e. the airwaves) they should be prevented from duplicating services already offered in an area by a commercial station.