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What do you want Ofcom to keep confidential?:

Keep nothing confidential

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

You may publish my response on receipt

Comments:

Town and Country Broadcasting (TCB) is one of the largest commercial radio operators in Wales. It operates six services, with four market leaders.

TCB is an advocate of minimal regulation for commercial radio and is frustrated by the remaining regulatory environment.

We are pleased to see the direction of travel in this consultation though, in our opinion, it does not go far enough. Ofcom has continually failed to keep up with the Industry's needs. Its failure to react positively to Radiocentre's Future of Radio document in 2007, its lack of vision, its inflexibility, its poor understanding of our businesses and its determination to hang onto outdated and unnecessary regulation has, in our view, harmed listening choice across the UK.

Commercial radio is struggling. It has had to battle through this toughest of recessions with an outdated regulatory model. The fact that more stations have closed under Ofcom than

under any previous regulator underlines their inflexibility. This has been compounded by 'over farming' of licences by Ofcom, with no regard for what level of advertising is available in local economies to support the new licences, has added to the problems. Community radio is the latest example of this 'over farming', placing even more pressure on local revenues, forcing more small stations to close. Ofcom's legacy has been to deliver not more choice but less; a failure of its statutory duties.

This consultation is a chance, hand in hand with a less onerous ownership regime, to free the commercial radio industry to once again prosper. Still highly popular with its listeners, and its advertisers, commercial radio fulfills a vital part in local communities across the UK. Government and Ofcom must now allow commercial radio owners the freedom to develop their businesses in a way that can benefit both shareholders and listeners.

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

We support this proposal as we believe the creation of more UK-wide commercial stations is a positive development and will be welcomed by listeners.

However, with no more analogue licences to be awarded, it is time to free all stations of all format restrictions. Commercial radio stations are not the monopolies they once were. All stations must compete for audiences and revenues and with ownership rules being relaxed it makes sense for all Format regulation to be abolished.

The option to become a national brand should be available to all stations. 'National' coverage should be assessed as per the Myers Report. i.e. 65% coverage and not just on a 'national' or UK-wide multiplex.

Also, stations in Northern Ireland, Scotland and Wales should be allowed to be fully UK national and not restricted to just their Nation state.

The BBC does not apply this thinking to its national services and it would be completely wrong for commercial radio to be more restricted, particularly as the sector provides a large number of quality, popular and successful local stations in each Nation.

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

We welcome the proposal to create a second national multiplex. If Ofcom had awarded the original second National multiplex to NGW rather than Channel 4, a second national multiplex would already be on the air!

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

We believe that stations should be able to co-locate wherever they wish within a wide geographic area.

We do not agree with Ofcom's proposed areas. They are inconsistent in population size, and in some cases do not make much geographic or commercial sense (in some instances, such as

Cheshire, a county is split in two meaning that stations in the same county cannot co-locate!).

Ofcom's objective again appears to be giving the smallest possible regulatory relief as opposed to opening up the recommendations of the Independent Myers report, which had larger 'defined areas'.

If any 'defined area' is to be considered, they should be based on the widest possible area 'such as ITV regions - giving greater flexibility and freedom.

Proposal 4: programme sharing within the newly defined areas:

We agree with this proposal but our point remains as above in Proposal 3. i.e. the ITV regions would be a better 'defined area'.

Proposal 5: mergers of local multiplexes:

We support the merger of local multiplexes, as long as it is driven by the multiplex owners.

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

We believe that the addition of any local news requirements is totally unnecessary. If local stations want to provide local news then they should be able to do so.

Proposal 7: AM stations:

We support the removal of obligations on AM stations to produce locally-made content or carry local material.

However, we disagree with the suggestion of persisting with requirements on these stations to produce output within the Nation where they are based. This is discriminatory and inconsistent with large AM stations in England.

Proposal 8: Limited redefinition of contemporary music Formats:

With no more analogue licences to be awarded, all stations should now be allowed maximum flexibility to grow their audiences and revenues.

Consequently, TCB believes that all stations should be free of all format/music restrictions, with all operators free to provide the most relevant service they believe best serves the tastes and interests of local audiences.