

Title:

Mr

Forename:

Bruce

Surname:

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Representing:

Self

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:

Firstly I would like to comment on the timescale for digital migration. I think the proposed date of 2015 is absolute fantasy land. Until and unless the vast majority of radios are digital, any analogue switch off will result in significant listener loss for those stations migrating. This will be strongly resisted by both the BBC and the commercial sector. There is the second issue of the platform itself. DAB is obsolete technology, inefficient in terms of bandwidth use and incompatible with other European digital standards. I note that DAB+ is not once mentioned in this document. It would appear then that Ofcom does not have a road map to migrate to DAB+ or indeed any other modern digital platform.

Overall I feel that the deregulatory nature of the proposals seem to be for the benefit of radio station operators and not for listeners. If it is indeed the case that the status quo is not sustainable, then a free market approach would be for stations to competitively bid for licences on the basis of maximum localness.

Research quoted in the document highlights listeners reluctance to give up local programming unless they were threatened with the consequence of not having a station at all. There is of course another option, which is to convert unviable local commercial stations into community stations. This might go some way towards redressing the imbalance in frequency

allocation between commercial and community stations. I'm sure listeners would rather have a unique local community station than an extension of an existing commercial one.

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

Even under ofcom's worst-case scenario, these stations are not in danger of going bankrupt. Therefore the only justification for doing this would be that there would be some benefit for listeners in doing so. Whilst it is possible that stations might invest in better programming, there seems little evidence that they would actually do this, being inclined to put shareholders first. Shared programming also has implications for the formats of these individual regional stations, which would inevitably have to change to some extent. It seems unlikely that any changes of this sort would result in a more diverse choice in listening, but almost certainly would result in less localness in programming.

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

I do not object to this proposal, although I note that it has been hard to fill the existing national multiplex, and I cannot envisage a whole load of stations queueing up to join a new national multiplex.

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

Co-location is generally not in the interests of listeners but may be a necessary evil in order to allow stations to continue to exist. However, there must also be a mechanism to permit reversal of this if economic conditions improve or the radio landscape changes considerably. This could perhaps be achieved through periodic reviews or at relicensing, where competing applicants increase their chances of winning a licence by offering more localness. This argument also applies to 4, 6 and 7.

Proposal 4: programme sharing within the newly defined areas:

Sharing of programming reduces the localness of programming, and reduces listener choice for two reasons: Where areas overlap, many listeners who were able to receive two different stations have that choice removed, and merging of programming implies merging of music formats which inevitably leads to a more mainstream music policy. As stated in the previous response, if this is considered essential as a necessary evil, there must also be a means to reverse it.

Proposal 5: mergers of local multiplexes:

Allowing local multiplexes to merge would mean that the digital platform is not available for local stations, meaning that FM or another digital platform is the only way forward for local broadcasting.

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

So stations should be allowed to ditch their local programming in exchange for providing regular local news. Isn't that something they should be doing anyway?

Proposal 7: AM stations:

This proposal effectively creates a new national AM station. If it is desired to produce a new national AM station, then using a series of local transmitters is an inefficient way of doing it. I would again advocate competitive licensing on the basis of how much (if any) local programming an applicant for a local AM transmitter is willing to provide.

Proposal 8: Limited redefinition of contemporary music Formats:

Of course it is reasonable that, as musical genres and people's tastes change, definitions of those genres change too. However, this should not be used as an excuse to relax rules designed to make commercial stations sound different from each other. I feel that these rules are already inadequate; most commercial stations outside London are very hard to tell apart and offer very little listener choice.