

**Name and title under which you would like this response to appear:**

Steve Jenner (High Peak Radio)

**Representing:**

Self

**What are your comments on these proposals?:**

Thank you for the opportunity to respond to the consultation, which I read with considerable interest. These comments represent my personal viewpoint. I am a director and investor in one of the few remaining completely independent commercial radio stations in England.

Firstly I would like to make a few comments regarding community radio.

I believe there should be no slackening of commercial controls over community licence holders otherwise many will become "back - door" commercial operations - particularly in relation to how much advertising is permitted, if at all. I'm very concerned that this is the area of policy which, if the proposed changes are implemented would require wholesale changes in legislation suggesting the original concept was probably ill - considered. I would join William Rogers of UKRD in his view that perhaps the BBC should have been charged with introducing community stations and I would also concur with the view of Daniel Owen of Chrysalis who questions the value of public money being spent on this initiative (particularly in my view if all this does is funds competitors for small commercial operations in an increasingly competitive market place.)

If legislation is being changed in respect of community licences then it should be amended in such a way that small stations of less than 100 000 MCA should not have to face a community licence on "their patch" at all. OFCOM has shown that stations between 50 000 - 100 000 MCA on average make a loss and subjecting these stations to competition from community stations in a tight market could result in more licences being surrendered even if the proposed format freedoms are implemented and this cannot be in the interests of the listener.

Before issuing a licence in an area where there is a small - scale commercial incumbent OFCOM should look at the format of the existing station and ask if the new station will add to listener choice or just damage the commercial incumbent without delivering demonstrable gains for the listener.

This leads on to another interesting question; does OFCOM have a social policy unit with governmental experience? Because if it doesn't, then who is qualified to make judgements on what constitutes "social gain" and on what basis?

I would argue against the need for any analogue switch - off at all. In many areas where radio is needed and appreciated it may not be possible to give an adequate digital service and in any case, why should listeners be forced to ditch units which have done good service for years? The old radio in the back of the shop, the thousands upon thousands of workaday car FM / AM units, etc? We ignore how radio is actually consumed at our peril and although this is changing, the bulk of it still happens in the sort of unsexy ways I have suggested.

OFCOM should take every step to ensure the interests of investors in commercial radio are looked after as the commercial model has served the country well, I believe, over many years and it would be wholly wrong to render the investments of many people worthless through legislation without some form of compensation being put in place; there is also a concern that "short - timing" analogue commercial services, particularly the small ones, will lead to much of the broadcasting talent in the commercial sector "leaking away" as the period of potential employment diminishes.

Whereas I would welcome the moves to "free up" formats, particularly in relation to local content, I believe the sensible proposal is to completely de - regulate this and allow stations to do the thing which works for them. We're quite happy with our arrangements and would probably opt to continue with them as we know our listeners value our local news output; I would contend that allowing stations to find their own way would enable managements to think creatively about how to maintain and indeed in some cases raise standards -but in ways which make operational sense to them.

Finally, OFCOM could perhaps consider providing some of the "radio fund" currently generously provided exclusively for community stations to those small commercial stations for whom gaining access to a digital platform is but an expensive pipe - dream. Perhaps we could be "match - funded" in the amount we are able to provide to the multiplex owner....!

Steve Jenner