

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

Michael Betton, Chief Executive, The Lincs FM Group

**Representing:**

The Lincs FM Group

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

RESPONSE TO OFCOM CONSULTATION DOCUMENT - The Future of Radio: The future of FM and AM services and the alignment of analogue and digital regulation - from the Lincs FM Group

**The Lincs FM Group**

The Lincs FM Group has grown by application rather than acquisition. It operates Lincs FM (Lincolnshire and Newark), Trax FM (Bassetlaw and Doncaster), Ridings FM (Wakefield), Dearne FM (Barnsley), Compass FM (Grimsby), Rutland Radio, Rother FM (Rotherham) and Fosseyway Radio (Hinckley). Lincs FM Group is a programme provider on the Leeds multiplex (simulcasting Ridings FM), on the South Yorkshire Multiplex (simulcasting Trax FM) and the Humberside Multiplex (simulcasting Lincs FM). We have been closely involved in the formulation of the response by RadioCentre to this consultation and are supportive of its recommendations. In our response we confirm our views on the main issues rather than deal in detail with the individual questions posed in the consultation document.

**Timing of deregulation**

We believe that the appropriate time for the introduction of content deregulation is now. Connecting deregulation to the uptake of digital radio on a national scale will produce an uncertain timetable for capital investment and longer term planning. Lincs FM Group, in common with almost all commercial radio groupings is already spending significant sums on DAB transmission with little return.

**Formats**

We agree that Formats should be simplified to capture the 'character of service' and that the detailed descriptions of content are not just unnecessary but stifle creativity and limit an operator's ability to respond to changing tastes. Whilst we are content with our current formats (other than the requirements for local production and presentation) largely because our group has grown by application rather than acquisition, we think that the simplification should take place immediately particularly to help align stations that have been acquired by groups.

**Localness**

Localness is hugely important to the success of all of the Lincs FM Group's stations. However, we think it is wholly inappropriate for the method of delivering localness to be regulated. The freedoms afforded by the revision of localness guidelines to remove locality requirements on the presentation of news bulletins has materially improved both the content and presentation standard of our bulletins. Ofcom should remove all input requirements and consider a self-regulatory system to insure the provision of local material. All our stations over deliver on their format requirements with regard to local content generally and news and information in particular. We

believe that continued input regulation is damaging innovation and that any system judged on a case by case basis adversely restricts stations from responding to technological advances in the most positive way to benefit listeners.

As a group we have invested significant time and money to allow us maximum flexibility in terms of location of production and presentation. Recent flooding in Rotherham forced us to close our studios as both power and access were cut off. We were able to continue to provide a dedicated local service from studios at two of our other sites. We are absolutely confident that a removal of input regulation, particularly with regard to physical location, will produce a significant net gain for our listeners.

### **Digital Migration**

It would be wrong to think that the burden of investment in digital broadcasting has been born by the larger groups alone. Lincs FM Group spends a similar percentage of revenue on digital transmission as larger groups and a much larger percentage of profits than many. We favour the RadioCentre recommendation of a formally-constituted, DCMS commissioned, Ofcom-led, cross-industry working group.

### **Ownership**

We do not believe that radio-specific rules are required, however we recommend that Ofcom should take steps, perhaps by issuing guidelines as to how multiplex operators should 'act fairly' between service providers, with the intention of facilitating as many analogue services being able to make the transition to digital transmission as possible.

### **Community Radio**

Simplifying the application process for Community Radio is welcome, provided there is no reduction in Community Radio's purpose and distinctiveness. We believe it is important that Community Radio should be a real alternative and not allowed to ape small scale commercial radio which provides often highly popular localised services to the benefit of many smaller local communities. We think it is too early to support the need for any changes outside the application process until more community stations are on-air and have spent longer operating under the existing regime.

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