

**Title:**

Mr

**Forename:**

Kelami

**Surname:**

Dedezade

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

London Turkish Radio

**Representing:**

London Turkish Radio

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

Proposal 1

1.1 We feel that small local stations such as ours, who have been providing a "specialist" service, will be hit very hard by some of the proposed changes. What makes us is our localness and the service we provide to a large number of people living in our locality. If you are going to link this to a threshold based on the overall proportion of listening accounted for by digital platforms - we fail to see the comparison.

1.2 If "streamlining" means less broadcasting hours then we would strongly oppose this and urge you to consider each station individually having looked at the kind of service they provide.

Proposal 2

Ownership issue is important and any decision made on this has got to be fair for smaller broadcasters.

Big multiplexes currently have a big say/ control over who should broadcast on digital. Even if we wanted to provide DAB (which we do) it would be extremely difficult to "get in" - we are forever told there is no room!

Proposal 3

The "switch-off" date proposal is not welcomed by us. Broadcasters such as ourselves who wish to move on to DAB, and for reasons stated above cannot, would be hard done by in that they will cease to broadcast.

3.1 We welcome the proposal of increasing the licenced areas of existing DAB local multiplexes so that stations such as ours could be accommodated.

3.2 We welcome a review in 2012 to consider the future use of FM in the shape of a consultation

We also welcome a review in 2009 to consider the use of medium wave again through a consultation process.

3.4 We welcome that the licenses re-awarded under the current statutory framework should be granted but oppose that these licences should expire on 31 December 2015. We feel that all broadcasters who wish to change to DAB but could not for reasons beyond their control should be given assistance to make the changeover. If the broadcaster then cannot make this change within the agreed time then a time limit be set.

3.6 We feel that Ofcom should be given the power to extend the existing licences for an indefinite period / reasonable period until the broadcaster moves over to DAB and also given the power to do the same when pirate stations create unfair competition in their area of broadcasting.

#### Proposal 5

We would like to see the following addendum to proposal 5:

Ofcom will do everything in its power to help and support all the licencees against unfair competition and abuse by pirate radio stations and use its discretion and powers to allow the licencee to fairly compete with the pirates if it does not or cannot provide this protection. Sometimes when necessary to increase the power or allow the licensee to broadcast on the same wavelength as the pirates (if it is different from their own) so that the pirates do not get the upper hand.