

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

William Rogers - Chief Executive Officer UKRD Group Limited

Representing:

UKRD Group Limited

What are your comments on these proposals?:

Proposal 1

The first issue requiring comment is that which proposes to introduce changes to analogue regulation relating to Format and localness conditions only when the percentage of listening on digital platforms has achieved 33%.

It is UKRD's view that these changes should be made immediately and that delay serves only to further exacerbate the many difficulties the sector faces. Both the competition and trading environment have changed dramatically over the last few years and Ofcom should address the issues facing the existing analogue operations now. We cannot understand or see why it is necessary for this whole process of recommended deregulation to be delayed.

The need to grow the levels of listening on digital platforms is hampered by the inability of commercial groups to deliver levels of investment appropriate to the task as a consequence of falling profitability.

Whilst the proposals contained within the Future of Radio are, in many cases, both appropriate and agreeable, the timing issue is one which neither reflects or deals with the seriousness of the issues the document appears to be seeking to address.

Simplification of the Format to reflect "Character of Service" is a more appropriate way of managing this process and is supported.

Proposal 2

Whilst Ofcom's approach to the liberalisation of ownership rules generally is to be welcomed, it is UKRD's view that there should be a change that results in the removal of all radio specific ownership rules.

Proposal 3

UKRD is not unsympathetic to the outline proposals made in the Future of Radio with regard to Proposal 3. Whilst a timetable for the switch-off of analogue radio is ultimately desirable, it is important to ensure that this is only confirmed when there is clarity of the routes available to all the various commercial operations, irrespective of size.

There is already limited availability of spectrum in respect of DAB and other alternatives are yet to be sufficiently trialled and accepted as viable options.

A review date is therefore an appropriate way of dealing with this to ensure that there is further clarity on the matter before firm decisions are made.

Proposal 6

As a principal, UKRD supports deregulation for whichever sector faces the challenges of today's trading climate. However, it is important to consider that Community Radio is not a traditional trading or commercial set of operations.

It represents, in essence, a further semi-state subsidised intervention within smaller markets which, itself, could have the effect of distorting the marketplace and potentially damaging the commercially dependent radio station operations.

It may be too early to make a serious judgement about how this semi-state interventionist set of stations is impacting upon the commercially reliant sector and therefore further caution is urged before making too many significant changes to the regulation of this particular sector.