

Future of Radio consultation

In response to OFCOMs invitation to comment on the above, I would make the following comments:

Proposal 3 (Ability to free up spectrum)

Closedown of VHF Band 2 (FM) and the MW/LW (AM) bands should not be considered at all. DAB reception appears to be generally poor, and needs a vast amount of work on it before it can be considered the sole broadcasting medium for reception on portable/car radios.

Car manufacturers are generally not fitting DAB radios to new vehicles, and there are millions of analogue portable/car radios, HiFi tuners, Walkmans, Mini systems in use, that most people are happy with and would be reluctant to have to spend yet more money replacing, having already being forced to replace all their TV and video recording equipment.

Use of the AM bands, and to an extent in the south east of the country VHF Band 2 has to be subject to restricting interference in Europe. So any other use of these bands would have an effect on European broadcasters.

Proposal 5 (DAB sound quality)

It is ludicrous to even contemplate changing from stereo to mono, and no doubt also eventually the lowering of sound quality by reducing bit rates on DAB, when there are proposals to closedown AM services because they are outdated due to inferior sound quality.

It is a backward step after promoting DAB as a superior quality broadcasting medium.

Are the public to be expected to purchase new radios, HiFi systems, car radios etc. to end up with the same quality as previously experienced on AM?

Proposal 6 (Community radio licensing and regulation)

6.1 Agreed.

6.2 Agreed.

6.3 Agreed.

6.4 Agreed.

6.5 Agreed.

6.6 Disagree. This should be looked at and made less onerous.

- 6.7 Agreed.
- 6.8 Agreed.
- 6.9 Community radio has the most restrictions imposed on any body in the radio sector, yet has the least staff and resources to deliver the service. It is apparent that some of the stations already licensed need as much help to survive as possible without unnecessary restrictions.

I do not see any problems with a station receiving 100% of their income from a single source, providing legislation is put in place to ensure that the single source does not influence the programme content.

The current limit of receiving 50% of income from on-air advertising and sponsorship should be increased to 100%. It should be in-line with all broadcasting. At present the system is anti-competitive with ILR/INR advertising rules. The same rules do not apply to local versus national newspaper advertising, and therefore one sector of broadcasting should not be singled out for ridiculous restrictions.

This is a modern competitive media world, where survival should be guaranteed by providing the best output, not by expecting to have restrictions imposed on the income sources of potential competitors.

- 6.10 Agreed.
- 6.11 Agreed.
- 6.12 Disagreed. One single corporate body should still only be able to hold one Community radio licence. Otherwise, there is the potential for future licences to be awarded to existing licence holders, on the basis of their experience, as happens in some ILR licence awards, thus preventing newcomers obtaining a licence. Possibly one way to overcome this is to only award a second or subsequent Community radio licence to an existing Community radio licence holder if no new organisation is interested in covering the same area. i.e, give the new organisation first refusal.
- 6.13 Disagreed. The feedback process should be simplified. Community radio is largely staffed by volunteers who have paid daytime jobs to do, and have a difficult enough time running a Community radio service, without having to compile lengthy annual reports. Again, as in 6.9 above, this is another restriction that ILR/INR, with bigger resources to not have.
- 6.14 Agreed in principle. Although, this should be amended to make the initial licence period 12 years in line with ILR services. Many Community stations will just be getting to the peak of their experience, when the end of the 5 year licence looms.
- 6.15 Agreed.

6.16 The best method of addressing this would be a 2 fold plan.

1. A complete re-shuffle of existing services on VHF Band 2, as per the Governments intention a few years ago, to make more efficient use of the spectrum.
2. Moving any users of 87.4 & 108.1 MHz to alternative frequencies, to allow the use of 87.5 & 108.0 MHz for broadcasting. The majority of domestic VHF Band 2 radios are capable of receiving 87.5 and 108.0 MHz, without modification, but are currently unused frequencies because one of their sidebands is outside of Band 2. This is a waste of valuable useable spectrum on mass market domestic receivers.

The above comments are my personal views, and have not been viewed by the full board of Vixen Broadcasting Ltd.

Paul Stellings
Chairman
Vixen Broadcasting Ltd.