

Title:

Mr

Forename:

Alex

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Gray

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

Wester Ross Radio Ltd

Representing:

Wester Ross Radio Ltd (operating as Two Lochs Radio)

What are your comments on these proposals?:

Two Lochs Radio holds a commercial FM local radio licence to provide a community focused service to the Gairloch and Loch Ewe areas of Wester Ross in Scotland. This is a sparsely populated, remote part of the UK, and the station has a very small TSA. Although fully commercially-licensed, the licence is held by a company constituted not-for-profit and for community benefit. We are one of a handful of Scottish Highlands and Islands stations in a similar situation, having obtained a licence prior to the introduction of Community Radio licences as such.

We are on the north-west coast of Scotland, many miles from the nearest DAB multiplex, and no multiplex licensee has indicated any interest in serving this geographically sizeable chunk of the UK, presumably because it is not seen as commercially viable. VHF FM transmission provides us with the most comprehensive access currently available to our target audience - which is everyone in our community. It is the only form currently well accessed and understood by young, old, office and shop staff, people in cars and those working outdoors on crofts and inshore fisheries.

So whilst broadly welcoming many of the proposals in Ofcom's consultation document, we are concerned at what appears to be a concerted push by Ofcom to drive a shift away from traditional use of FM on Band II towards digital delivery, DAB in particular, and to the clearance of Band II for some as yet unidentified purpose. Maintaining a 20MHz band (or perhaps 10MHz if the BBC decides to quit Band II) is by no means excessive as a way of providing truly local, community and access radio. Particularly with such large swathes of Bands IV and V being cleared by digital TV switchover. It would also maintain a level of world compatibility that is likely to be beneficial for some decades to come.

We should also look at this of course in terms of the 'installed base'. For a station with many elderly listeners such as ourselves, the receiver profile and the ability and willingness of our audience to switch to DAB or Internet will be considerably less than those of urban mainstream commercial audiences.

While we recognise the sense of holding a comprehensive review of radio spectrum, we suspect that 2012 is probably the earliest date this will make real sense, and feel that the threshold suggested of 50% digital access as an early trigger for review is too low.

We can see the sense in alignment of the regulatory and licensing framework between analogue and digital platforms, but feel very strongly that Ofcom is proposing almost a lowest-common denominator approach, and we deplore this. The lighter regulation of digital services was introduced initially with a partial justification that a fragile new industry sector could be killed at birth if subject to the same level of regulation, in particular in relation to localness, as traditional analogue radio. However, Ofcom makes it clear it feels we are well past that early phase, with digital access reaching a substantial proportion of all listenership and growing fast. So now could indeed be the time to consider realigning the framework, but the general thrust should be in the direction of raising the general standards and requirements of digital broadcasting closer to those of traditional analogue broadcasting.

We do not agree that existing FM licencees should not have by right access to digital broadcast delivery in the event of a planned withdrawal of FM licences - it seems a basic provision that should be made a condition of digital migration, just as it is effectively a condition for analogue switch of TV.

We also feel that as well as encouraging the market to produce multistandard receivers (FM, DAB, DAB+, DRM), Ofcom should be encouraging manufacturers to provide similar facilities for all platforms. There is no serious technological barrier to providing live pause and rewind on a DAB+FM radio - it's purely a marketing decision. At most an additional DA convertor block and some extra logic is required. Indeed many pocket MP3 players already contain everything needed (FM receiver, MP3 encoder, memory, MP3 playback) in thumb-sized devices, and have done for some years.

Similar RDS could be exploited to provide EPG style programme selection, scrolling text music identification etc. But Ofcom seems determined to overlook this existing infrastructure and its potential full exploitation, preferring to suggest to the public that such things are technically possible only "on Digital". We are also uncomfortable with the use of the term 'in a DAB household' or similar words to equate to 'DAB (exclusively) listeners'. We suspect that a very high proportion of those in DAB households still make heavy use of FM, eg in the car, on a hi-fi, at work etc, and would wish to continue doing so. So in assessing at what level of digital access we are, this should be based purely on proper research figures as to actual listening, not equating DAB ownership to exclusively DAB use.

In closing, we would also suggest that while it is reasonable for the major debates to center around the 90% of the population likely to be provided with a full spectrum of services and platforms, it would be only proper for 10% of Ofcom's final report and recommendations to be devoted specifically to the remaining potentially disenfranchised 10% of the population's interest.