

**Title:** Mr

**Forename:** TERENCE NOEL

**Surname:** FLYNN

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

**Representing (self or organisations):** Organisation

**Organisation Name :** 87.9 SFM

**Question 1: Do you agree with the proposal to liberalise the restrictions on the issuing of S-RSLs in all areas where a new commercial service is advertised, or where a new commercial or community service is due to be, or has recently been, launched? If you do not agree with this proposal, please set out your preferred alternative explaining why you believe it would be a more appropriate option.:** Yes.

**Question 2: What is the most appropriate way for Ofcom to decide between competing short-term RSL applications for broadcasts to cover the same event in the same area at the same time?:** There would inevitably be difficulties deciding what criteria to apply in these situations. Quite clearly the first in time would be arbitrary and potentially unfair. Any losing party would likely feel aggrieved if an award was not made to them. In such a situation perhaps the fairest way to proceed would be to set a cut off time for applying and then putting all applications which meet the required licensing requirements into a hat with the first one being drawn out being awarded the licence

**Question 3: Do you have any comments on other areas of S-RSL policy, as set out in the 'Notes for Applicants', that you would like to bring to our attention?:** No

**Question 4: Do you agree with the proposal to allow commercial establishments to apply for L-RSL licences?:** Yes

**Question 5: Do you agree with the proposal to offer L-RSLs for one-year as well as five-year period:** Yes

**Question 6: Do you have any comments on other areas of L-RSL policy, as set out in the 'Notes for Applicants', that you would like to bring to our attention?:** No

**Question 7: Do you agree that we should license 'ADS-RSLs' once the ADS trial ends on 31 August 2006?:** Yes

**Question 8: Do you agree with the technical characteristics of the licence? If not, what alternative proposals do you have in mind?:** Yes

**Question 9: Do you agree with our conclusions on the potential interference issues concerning shared programme-making use of the spectrum? If you disagree, please give reasons.:** Yes

**Question 10: Do the current arrangements ensure that programme-making use of the sub-band at ":** Yes

**Question 11: If circumstances permit, should 'ADS-RSLs' be available for longer than five days, and if so what is/are the appropriate licence duration(s)?:** Yes, possibly as in RSL's namely 28 days

**Question 12: If circumstances permit, should the link between an ":** Yes

**Question 13: Do you agree that the availability of 'ADS-RSL' licences should be extended to 'non broadcast' frequency bands other than 60.75 to 62.75 MHz?:** No

**Question 14: Do you have any comments regarding the costs and administration of 'ADS-RSLs'?:** No

**Question 15: Do you foresee interest in accessing up to 8MHz of frequencies in the 55 to 68 MHz band that are presently almost unused, and if so for what types of service and/or technology? Do you have any views on how Ofcom might release this spectrum to the market for use?:** Not from 87.9 SFM