

### **Q1). Liberisation of restrictions on RSLs**

I agree with the liberisation of the restrictions on RSL dates where an award is either imminent or recent. I think that with the changing of application requirements that dilute the necessity of a pre application RSL means that any short term broadcast has a small and non lasting effect on any given area. I honestly believe that the one month prior and 3 months post award is ample time to allow the awarded service to gain support and is also quite acceptable as a courteous gesture to the new service.

### **Q2). Multiple applications for same event, same place, same time RSLs.**

Having applied for many RSLs over the last 2 years, I have come to terms with the first come first served basis that Ofcom works with. I believe this is the best possible and fairest way to award S-RSL Licences. The additional proposals all have huge flaws that can be resolved by lack of change.

Proposal 1, drawing lots.

This is ludicrous. Any professional establishment that applies for an RSL should have their application in with adequate time for successful award. By drawing lots Ofcom will be placing all applicants at the same level, weather they have worked efficiently 3 months prior, or have pushed their application in at the last minute. It also means that when acquiring Ofcom guidance on a particular area all potential applicants may be told to apply even if the area and dates are taken as Ofcom still gain the £400. Drawing lots is unfair to those who work best along side Ofcom regulations and doesn't allow companies to plan ahead, as their application may not be accepted even with the best planning.

Proposal 2, Beauty Parade.

I agree with Ofcoms comments with this proposal. It shouldn't be relevant whether the RSL is making a profit or not as this is beside the point. I do understand that a better service may be provided with this extra diligence, but it is a lot more work for Ofcom and may slow down application. It could also be susceptible to influence by other applicants wishing to 'not allow' the smaller less professional applicants that currently only have RSLs as an option.

Proposal 3, Bid.

Not in a million years. This means that we will be reverting to a richest win situation. I appreciate that this is only RSL licences but if we look at other countries like Australia where full licences are bid for, we end up with conglomerate companies owning the air ways and no real diversification in broadcasting styles and content. Community licence holders often don't have too much money and religious broadcasts shouldn't be awarded on who pays the most. This will also negate the Ofcom programming policies that have been developed with the move from the radio authority to broaden choice for the listener.

Proposal 4, Outside Adjudicator.

Why? I don't believe that an outside body can do anything that Ofcom can't as Ofcom are supposed to the experts.

First come first served is the cheapest, easiest, fairest and most acceptable way to issue RSLs, applicants should take this into account, speak to Ofcom before applying to discuss possible problems. I do this every time and never have an application returned. Also if a particular

application is not really relevant to the award then it shouldn't be allowed by Ofcom, not anyone else.

Notes for applicants.

Some other points that I believe should be mentioned.

Ofcom have a restriction on RSLs being run within 4 months of each other by the same company in the same place. Why? I understand the problem with available frequencies and the need to allow other services a chance to broadcast, but surely there is a better way. Maybe a restriction of only 28 days in any given 4 months. Meaning one could run 2 RSLs of 14 days each, or 28 RSLs of 1 day each. Each one of course needing a £400 application fee.

This would protect the other applicants but also allow RSLs to be used more strategically. This is a change that would work with Ofcom's recent guidance that explains how RSLs are no longer key to successful commercial application, but more relevant are the results from an RSL or its research.

## **L-RSL**

Commercial establishments.

Great idea. I agree with all the points outlined and believe that this move will release restrictions that are not needed.

1 – 5 years is ideal for a L-RSL as rightly said by Ofcom, there are different needs and reasons for L-RSLs and therefore a variety of different required lengths.