

Title: Mr

Forename: Tom

Surname: Buckham

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

Representing (self or organisations): Organisation

Organisation Name : The NR5 Project

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.: I strongly agree with the proposals to liberalise the restrictions. Whilst it is obviously an important time for groups who have recently launched, the current restrictions are particularly unfair for other groups who would like to deliver an RSL and who find their applications turned down. The current legislation which dictates a period of up to a year is especially harsh, especially in the context of community radio development. Community radio services differ vastly to commercial operations in terms of content as well as overall aims and objectives, and it strikes me that the current restrictions are based more on the idea of protecting commercial stations from other commercial ventures and don't take into account the increasing development of community radio. I think there should be a small amount of time before and after a station launches in which RSLs are not permitted as the launch of a station is very important time - however I would say that a period of 1-2 months prior to and after the launch would be more suitable as the current legislation dictates too long a period in which RSL activity is not allowed.

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?: I feel the date when an application is submitted should be taken into consideration, but it shouldn't be the only determining factor when deciding which application is chosen. Evidence of creative and relevant programming ideas should be closely examined to determine which of the groups is more likely to deliver a quality content. If groups are going to be covering a the same ?event? then the application which sets out the most well thought out plans should be considered first. Past experience should also be looked at but new broadcasters should be given a chance as well as it is only through actively broadcasting that groups can develop their broadcast content and standards. Potentially if there is a situation where a group who has delivered a number of RSLs are competing with a new group; providing the new group has submitted a well thought out application it might be worth considering that they should be given an opportunity, based on the fact that the other group has broadcasted before and the development of new broadcasters must always be encouraged.

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?: I do not disagree with it, as long as it doesn't contribute to the ever increasing frequency congestion in certain areas. Commercial establishments operating L-RSLs should not take up frequency space which is contested by other non-commercial radio groups - although as the consultancy says this is unlikely to be the case. The AM waveband is suited for L-RSLs and should continue to be used to this effect.

Question 5: Do you agree with the proposal to offer L-RSLs for one-year as well as five-year period: Yes ? one year licenses would provide an opportunity to trial the service effectively and gauge the need for the service.

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?:

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

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.:

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

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)?:

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

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?:

Question 14: Do you have any comments regarding the costs and administration of 'ADS-RSLs'?:

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?:

Additional comments:

