

Title:

Mr

Forename:

Jason

Surname:

Bryant

Representing:

Organisation

Organisation (if applicable):

Town and Country Broadcasting Ltd

Email:

bryanradio@ntlworld.com

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

The limited options for change provided by Ofcom are disappointing, given the widely recognised changes and expansion in the audio entertainment market and Government's stated desire to see less regulation for commercial radio.

We submit that music formats serve no useful or meaningful purpose in today's digital media

market and that commercial stations should be solely regulated on their promises and provision of local content. Such a move would be measurable, more easily regulated and, we believe, would be welcomed by listeners.

Where local stations have adopted a "national brand" strategy, this change would enable innovation and competition, with other operators able to compete directly for listeners with a more localised service.

Question 1a: Which of the three options outlined in this consultation document, if any, do you consider would best meet the needs of both listeners and licensees? Please explain the reasons for your view.:

Option 2 but with a significantly broadened catchment for mainstream music as below.

Question 1b: Do you agree with the simplification of descriptions we propose under Option 2, and classifications we propose under Option 3? If not, please explain the reasons for your view and provide alternative wording.:

We submit that all gold and easy stations should be able to work under a "mainstream music" format since it is clear that they are playing music that was (and remains) mainstream and popular in appeal.

Question 2: If you think there are other options which would be consistent with the statutory framework, please provide details and explain the reasons for your view.:

As per our general comments, we believe Ofcom can fulfil its statutory criteria by awarding licences and regulating licensees through their provision of local content rather than through music formats.

We believe listeners would appreciate an increase in local content being provided rather than continuing with what are outdated and increasingly subjective interpretations of music definitions.