

Title:

Mr

Forename:

William

Surname:

Rogers

Representing:

Organisation

Organisation (if applicable):

UKRD Group Limited

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:

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.:

Our position is that there should be "no change" to present regulation. The purpose behind the regulation of the radio sector is to ensure that there is a range and diversity of local radio services. Indeed, this is backed up by a statutory duty. As a result, it is clear that whatever regulatory approach is adopted, the core requirements of range, diversity

and localness should rest at the heart of any such review and proposition.

From our own experience, prior to the simplification of formats last introduced by Ofcom, we were forever in discussions about change and needed to have frequent, and from our perspective, sometimes elongated and frustrating meetings to try and secure what we regarded as necessary flexibility to different components of the formats in operation. Since those changes, our experiences have been dramatically better and, for us, the present system clearly works perfectly satisfactorily.

The radical changes already seen in many instances where former heritage stations have been changed to musically different offerings already indicates that there is ample flexibility within the present structures and rules without the need for further relaxation.

There already exists a procedure in which a format may be changed. Whilst we acknowledge that for many businesses, these changes may appear to take a long time to process and like all businesses we'd like to see a smoother and quicker decision-making process operate, further relaxation is in danger of throwing out the baby with the bathwater; something we urge Ofcom to resist.

It is a fact that the industry has undergone further consolidation in recent years and, as a result, many operators now own a number of licences covering the same geographical areas. What is important is not that the OWNER of a collection of radio stations offers a variety of music formats on its various stations because, ownership can and does change, from time to time. What is important is what the format is for each STATION regardless of who the owner is at any one given time.

If someone buys a Grade 1 listed house, they should not subsequently complain when they are unable to make alterations. They knew that when they bought the building.

The diversity and range of ILR's today is less than it was ten years ago. With a regulatory duty to ensure that range, diversity and localness sit at the heart of decision-making, it is difficult to argue with any conviction that this can be delivered by further erosion of format obligations when it comes to music or, for that matter, anything else.

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.:

No. This will merely create blurred lines and too many grey areas.

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.:

No change is, in our view, the only option which is consistent with the present regulatory framework