

Title:

Mr

Forename:

Piers

Surname:

Collins

Representing:

Organisation

Organisation (if applicable):

UTV Media (GB) Limited

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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.:

UTV believe no change is required to the current music format descriptions. The current approach best serves the tastes and interests of listeners as evidenced by the high reach and listening hours of local commercial radio services. Option 1 maintains the integrity of the current licensing framework and the basis on which licences were originally granted. UTV do not believe market changes have made it any more difficult to comply with licence conditions and it has not suffered any increase in the regulatory burden or operating costs as a result of

the current approach. We agree with Ofcom that this option offers the greatest certainty to licensees in terms of compliance and also would require no additional implementation costs.

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.:

UTV do not agree with the second option of simplifying the description of non-specialist music formats. The non-specialist genres identified by Ofcom all have a subtle distinction and the removal of these to a one-size-fits-all category will only serve to homogenise the music offering of local commercial radio as stations fight it out for a share of the most attractive commercial audiences, which will by definition narrow the range and diversity of services contrary to Ofcom's statutory duties.

As Ofcom point out several times throughout the consultation document, licensees are currently able to submit format change requests should they believe their existing format is making it harder to cater for tastes and interests of their listeners. The implementation of Options 2 and 3 will substantially increase the regulatory burden and the number of consultations.

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.:

UTV do not propose any other options other than the current music format descriptions and believe no changes should be made.