

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

Lincs FM Group

**Email:**

**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:**

N/A

**Question 1: Should Ofcom have a new policy of 12 year licence durations, where local analogue commercial radio licences are re-awarded?:**

Yes. We believe that Ofcom was misguided in deciding to limit terms to seven years when it consulted in 2010 and that there were compelling reasons then that should have resulted in the 12 year regime being restored at that time. Many licences are held and operated together

and therefore investment is often across a number of services. Seven year terms, assuming award is one year ahead of the licence term starting, result in the average unexpired term being four years. The 2010 decision, although a modest increase from five years, did not help investment - we welcome the fact that Ofcom are seeking to correct this. Twelve years terms will result in the average unexpired term being six and a half years - close to the figure that Ofcom identified as being a reasonable period over which to recover investment.