

Consultation response form

Queson	Your response
<p>Question 1: Do you agree that Ofcom’s duty to secure ‘localness’ on local commercial radio stations could be satisfied if stations were able to reduce the amount of locally-made programming they provide? If not, please explain the reasons and/or evidence which support your view.</p>	<p>Confidential? N</p> <p>The Advisory Committee for England (ACE) accepts that the economic pressures on local commercial radio indicate the need to explore greater cost and operational efficiency.</p> <p>We would also comment, positively, that the consumer research looks strong and relevant, and the results of it directly feed into the proposal, so it feels like listener views have been taken into account. A good attempt has been made at balance with commercial stakeholder views considered too. The overall proposal seems well considered and fair/ balanced between the competing views.</p> <p>However, we remain concerned that the proposals will lead to a diminution in local representation and voice (or station character as used in the consultation document). There is already a weakness in this aspect which is determined by the defined local areas. As an example, two adjacent local areas are Manchester and Stoke. Yet there are sizeable towns that sit between those two cities that would not identify with either. ACE is concerned that local character for those towns (and many similar towns and communities throughout England) will further lose appropriate portrayal and representation.</p>

Question 2: Do you agree with our proposed amendments to the localness guidelines relating to locally-made programming? If not, please specify any amendments you think should be made instead (if any), and explain the reasons and/or evidence which support your view.

Confidential? – N

ACE accepts that the consumer research clearly shows that local voice/character sits quite far down the list of listener requirements from a local service. However, ACE has concerns that a move to nationally produced breakfast shows ultimately reduces local content to relatively minimal levels and, once again, reduces the opportunity for the station to be truly representative of the served area.

We have no issues with the removal of a requirement to produce locally made Breakfast shows at weekends and public holidays.

Question 3: Do you agree with our proposed new approved areas? If not, please specify any alternative proposals you think should be considered (if any), and explain the reasons and/or evidence which support your view.

Confidential? – N

As stated in Question 1 response, ACE is of the view that the existing local areas already lead to a lack of representation, identity and local voice. However, the proposed new areas do not make this worse, therefore we have no opposing view to the proposed changes.

Question 4: Do you agree with our proposed amendments to the localness guidelines relating to local material? If not, please specify any amendments you think should be made instead, and explain the reasons and/or evidence which support your view.

Confidential? – N

We welcome the clarification that, even if shows are produced outside of the local area for economy of scale and efficiency reasons, local content must be an accurate reflection of the local area served. However, we are sceptical of the practical implication of this and feel that there is a risk that such production methodology will lead to a homogenisation of voice over time.

ACE would prefer the retention of local production for local inserts to nationally or regionally produced shows.