

Consultation response form

Consultation title	Localness on commercial radio
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Representing (delete as appropriate)	Organisation
Organisation name	Harlech Properties Limited

Your response

Question	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>We do not agree. Definition – LOCAL: 1. a. Of, relating to, or characteristic of a particular place; b. Of or relating to a city, town, or district rather than a larger area. 2. Not broad or general; not widespread.</p> <p>There is a desire by media cartels to remove 'local' from 'local commercial radio'. 'Local' in radio is about being part of the local community, carefully defined by the geography of the original licence. The format of a station is NOT just about music, it's the recipe which defines it as coming from its broadcast region – presenters, news, information, and languages used. Unfortunately, the big companies will choose to muddy the water between 'local material' and 'locally made'.</p> <p>Both actually need local voices, people in the broadcast area, and to maintain quality the best way to produce such material is in local studios rather than via phone, Skype, and so on – results of such often are not all they could be.</p> <p>Debates, for instance, are best when people are sitting across a table from each other. In other words, producing away from the area loses that spontaneity and interaction. Centralisation is a false economy, or do these big conglomerates expect participants in their programmes to travel a great many miles for free?</p>
<p>Question 2: Do you agree with our proposed</p>	<p>No. A line has to be drawn in the sand. This has</p>

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.

become about profits, and nothing about the listeners – existing or potential. The ‘bricks and mortar’ argument is a red herring – with developments in technology and smart thinking in terms of premises means ANY station can have a cost-effective visual presence within a broadcast area. Radio should be seen AND heard, and is the easiest way is to make a physical connection with the audience, especially if combined with local Outside Broadcasts, (which get little mention in proposals from the big broadcasters). The amendment to make is to insist that a significant proportion of programmes MUST be produced in the original licence area (e.g., an average of 4 hours a day), not ‘approved area’.

We also take issue with point 2.45 concerning the Welsh language. We have seen commercial Welsh language local commercial radio programming in Wales completely decimated this decade, and is about to be eliminated entirely if Nation Broadcasting’s proposals for the Ceredigion local FM licence are considered acceptable. With this in mind, and in line with the statement made in point 2.44, we make the case that there is an equality group which will be detrimentally impacted by these ‘localness’ proposals – speakers of the Welsh language.

Regarding point 3.10, the statement on presenters does not take into account that a good presenter will be heard but carries out their task without a huge impact on listeners. The only time presenters tend to be noticed is when the listener considers them to be bad at their job. No station would ever want this to be the case.

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.

We do not agree. If we take the counties of Ceredigion, Pembrokeshire and Carmarthenshire as an example, all within ‘North and Mid Wales’, soon to be ‘Wales’, Nation Broadcasting is the first to admit that a ‘one size fits all’ approach has NOT worked, especially in their case for Ceredigion. This has meant them effectively ‘throwing in the towel’ on local FM broadcasting for that county, and wanting to turn the local transmitters into no more than relays of a national service.

	<p>Point 4.6 is again a little disingenuous to presenters and a physical presence in the area. Technology does allow you to broadcast from any place to anywhere, but where is the physical connection? Why not look at the technological revolution as allowing stations to broadcast easily from anywhere WITHIN their licence area cost effectively?</p> <p>We are aware of stations following this anti-presenter stance to its logical conclusion, and doing away with presenters entirely. In other words, competing with Spotify and the like by being even more like them. This is clearly not why people tune in to local radio, but for some reason this is not being recognised.</p> <p>Leave the approved areas as they have been, and insist on stations being on the map in their licence areas by having a presence, or there is no point calling them 'local'.</p>
<p>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.</p>	<p>We do not agree. If the big corporate stations do not want to be involved in local radio, and as a necessity this actually means they need to be local to their listeners, then it's time to build up the scale and remit of community radio.</p> <p>Ofcom is already giving community stations an opportunity to increase the size of their broadcast areas, with a September 2018 deadline for applications. Community radio stations should be encouraged to take on the remit of localness of local commercial radio stations, and allowed to instigate the economies of scale we keep being told by the big corporates are so essential for survival.</p> <p>If these big companies really believe this is the case, which all their rhetoric suggests, then it is time to really shake things up, and give the support to those who actually believe in local radio – the community stations.</p> <p>It appears the research carried out has been geared to NOT appreciate a radio format as a package, but instead as a series of seemingly unlinked elements. It's like decoupling the parts of a movie into characters, music, dialogue, special effects and storyline. Blockbusters do not work like that, and neither does radio.</p>