

**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.**

Ofcom's response appears to do nothing to secure localness.

In my current area the nearest "local" commercial station is thirty miles away and while it does pre-record local weather and insert some traffic news the general output is clinical and gives no outward impression of being part of its westerly TSA - which reflects in its local RAJAR figures. The next officially licenced station is a full hour away. A formerly very good station now "neutered" in every sense.

**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.**

No.

The amendments are making a poor service potentially worse. The more geographical neutral a station becomes the less of a local service you get. This is fine for the super stations but not if you want a local service where the station is part of the area it really wants to serve.

**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.**

Partially. If a new licencing system was introduced based on say 4 levels from national down to small scale local/community then the new proposal would be acceptable for the larger/regional services.

**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.**

NO. The current and proposed systems are stifling local radio. The more remote it becomes the less attachment there is for the licensee and certainly the less attachment there is for the listener and potential listener.

In your "NEW AUDIENCE RESEARCH section 2.32 figure 3 the answers provide Ofcom with a dilemma. Neutralise a stations' output, play the "right" music and you get listeners. Conversely super serve a geographically local audience and as we have seen in some parts of the country we do get successful locally based stations.

So in the 2020s are there to be relevant Ofcom guidelines for the radio community at large, or should Ofcom remove guidelines all together? Muddling along in the middle does not work.