

## Consultation response form

<b>Consultation title</b>	Localness on commercial radio
<b>Full name</b>	Blair Crofts
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Kingdom FM Radio Ltd

## Your response

Question	Your response
<p><b>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.</b></p>	
<p><b>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.</b></p>	<p>Strongly disagree.</p> <p>Kingdom FM is one of the few remaining independent radio stations in Scotland. The proposals detailed in this consultation paper will sound the death knell for small independent stations like ours. We are not alone in this view and others like us will find little room to be competitive if the proposals go ahead. They hand an unfair advantage to the larger groups and will force us to have a complete rethink on how we run our operation to survive in a world where locally-made programming is a perception instead of a reality.</p> <p>Kingdom FM is looking for more leniency in order to remain competitive, for example, power restrictions placed on Kingdom FM’s transmitter sites (by Ofcom) act as a barrier to competitiveness, as does the prohibitively expensive route to DAB. The roll out of small scale DAB is very positive but the timing of its implementation has been frustratingly slow. Would it be possible to provide a “Scotland only” breakdown of the new audience research commissioned earlier in the year? Are the</p>

	findings for Scotland the same as those borne out in the UK wide survey?
<b>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.</b>	
<b>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.</b>	