

## Consultation response form

<b>Consultation title</b>	Localness on commercial radio
<b>Full name</b>	Michael Betton
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Lincs FM Group Limited

## Your response

<b>Question</b>	<b>Your response</b>
<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>	Yes. We concur with the view of RadioCentre that 'localness' can still be secured if stations are able to reduce the amount of locally -made programming. If these guidelines are changed it will not alter programming on any Lincs FM Group station – all of which provide (other than the Network Chart) individual locally-made programme streams 24 hours a day.
<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>	Yes.
<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>	<p>Mostly. We welcome the larger areas for programme sharing although as with our answer to question 1 this will not alter any aspect of our current operation – there will be no reduction in studio sites.</p> <p>However, we are concerned, as we were with the original areas with the hard boundaries. We suggest that in addition to a willingness to consider case by case requests for sharing arrangements across boundaries Ofcom could</p>

	<p>be more specific where small stations are only just outside the area that they wish to relocate to. Although we have no desire to leave our site in Oakham, Rutland Radio, one of England's smallest commercial services is in the East Midlands area yet has half its TSA in the county of Lincolnshire. If a co-location were to be considered it would be with Lincolnshire. Generally, we would welcome a more specific statement regarding stations with small MCAs adjacent to borders, that requests would be considered favourably and that Ofcom would not be obliged to consult where the proposal would not be expected to have a negative impact on listeners.</p> <p>Specifically, we suggest that Stamford and Rutland would be more appropriately located in the new Yorkshire area – which itself would be better named Yorkshire &amp; Lincolnshire.</p>
<p><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></p>	<p>Yes</p>