

Consultation response form

Consultation title	Localness on commercial radio
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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>Before I write anything, I should state that I am a U.S. citizen and do not reside in the United Kingdom or have British citizenship, but have visited occasionally and know of people in the UK.</p> <p>There was nothing in the Ofcom rules that stated a U.S. citizen could not participate, so I have decided to participate anyway.</p> <p>All content is original research.</p> <p>----</p> <p>Localness should never be reduced on local commercial radio stations. There is research to back this up, proven by statistical research from 2008-2014.</p> <p>There is substantial research that proves listeners value local content to some extent, and not just in major circumstances like floods, terrorist attacks, fire, major emergencies.</p> <p>Rather than reducing local-made programming, some radio stations should be, by statutory</p>

	<p>requirement, have as much local programming and content as necessary.</p> <p>There is substantial evidence from American researchers – 2004, 2008, 2012, 2014 that proved listeners value locality as a major selling point.</p> <p>Unofficial research in 2007 has proved this.</p> <p>No station should be local for only 3 hours a day, whatever the day of week.</p> <p>Localness needs to be defined as:</p> <ul style="list-style-type: none"> - Produced and presented from the studios (except in exceptional circumstances such as travel / logistics, a presenter based in Nottingham could do a show for a Birmingham station provided they were educated on local things in the TSA) - Cover local events and uniqueness in the area - Programming that is relevant to the people in the area.
<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.</p>	<p>The proposed amendments of stations having only one local programme three hours long, does not fit in with the ideals of local radio and listeners are against their local station being a relay of one station’s content.</p> <p>People in Nottingham would not like it if Capital East Midlands was to become London-only 6am-4pm with one local show 4-7pm weekdays and no local programming the rest of the time.</p> <p>From what I know, listeners prefer local in many cases, as has been seen in the U.S.</p> <p>There is evidence that listeners prefer stations with more local programming, as back in 2004, one station in California proposed to have only local breakfast 6am-10am and drive 2-6pm, but this proposal was not popular in February 2004 (the station was similar to the Today’s Best Mix-era GWR-owned radio stations in the United Kingdom).</p>

Certain stations should have a “localness quota” whereby they have to be local for at least 16 hours local weekdays and 12 hours local Saturday, 10 hours local Sunday, and can only network from 10pm-6am weeknights, 6am-6pm Saturdays and 6am-4pm Sundays. Exemptions could be made if a station does not carry the chart show or any networking.

These stations are defined as CRS – City Regional Stations – and their main goal is “To produce local radio for a city that is a major city in England, Scotland or Wales, with local news and travel updates throughout the day. On FM they must be local, but DAB stations can be networked as much as possible, with no local programming, however, a distinction must be made between FM and DAB if the stations share a name.”

For stations in Scotland, there would be an amendment on localness – no networked output can come from London except for specialist shows, and if the station’s TSA is any of these cities:

- Glasgow
- Edinburgh
- Aberdeen

Then it has to be local 6am-7pm, although Clyde 1’s license should be amended so that it is local 1am-8pm weekdays due to sport broadcasting, and 1am-6pm Saturdays, 1am-4pm Sundays.

Forth One should be allowed to take networking from Glasgow, but only 7pm-6am weekdays, 6pm Saturday-6am Sunday, 4pm Sunday-6am Monday, provided that local content is inserted into networking, but the same rules apply.

Clyde and Forth should not share daytime networking 10am-4pm, so under an amendment to the regulations Scottish stations that serve major cities could not produce shared daytime networking except if they were licensed to broadcast specialist output like rock, R’n’B or Asian music, where locality is

secondary to the music.

Therefore, Smooth Radio Glasgow would be exempt, but Capital Scotland would not.

Due to Radio Borders' status as a border station, it should retain local programming 6am-7pm, and network with Clydebank 7pm-6am weeknights as currently, with no changes, and that travel news should be enhanced due to cross-border Scotland/England commutes – Scottish people working in Carlisle and vice-versa.

The stations with this requirement would be local at these times:

Monday – Friday: 6am-10pm

Saturday: 6am-6pm

Sunday: 6am-4pm

These stations would be defined as "CRS" (City Regional Stations) as an amendment with these stations having to comply with the amendment:

London

95.8 Capital FM

Heart 106.2

Magic 105.4

Absolute Radio

Bedfordshire, Buckinghamshire & Hertfordshire

Heart Dunstable (should be split from existing merged station)

Due to Luton's importance as an airport city and commuter center, this license should be standalone from the other Heart stations within the building – Heart Milton Keynes and Heart Northants and have local programming
06:00 – 19:00 weekdays – 13 hours
06:00 – 18:00 Saturday – 12 hours
06:00 – 16:00 Sunday – 10 hours

and requirement for enhancement on traffic news and local news due to TSA's proximity to airport.

Programme-sharing with Heart London not permitted, except for chart show, despite Heart Dunstable being heard in parts of North London which overlap with 106.2.

Cambridge

Heart Cambridge (with Peterborough station co-located from Cambridge, but separate programming)

Sussex

Heart Surrey & Sussex (split into two stations on co-located basis with separate programming, similar to how WISH FM has separate stations within same building, so separate shows for both counties)

Yorkshire

Hallam FM (Sheffield)

Radio Aire (Leeds)

Viking FM (Hull)

Pulse1 (Bradford & Kirklees)

Minster FM (York)

With regard to this – Hallam, Aire and Viking cannot network in daytime hours, with local programming:

06:00 – 19:00 weekdays – 13 hours

06:00 – 18:00 Saturday – 12 hours

06:00 – 16:00 Sunday – 10 hours

Greater Manchester

Heart North West 105.4 (regional)

Hits Radio Manchester

XFM Manchester (should be local only breakfast, afternoons and drive, with two local weekend shows – well, four in total, two on Saturday, two on Sunday, due to format, can be networked rest of the time)

102.4 WISH FM (Wigan)

107.4 Tower FM (Bolton)

Heart North West is only local 6am-10am and 4pm-7pm weekdays and 6am-10am Saturday, 12pm-4pm Sunday, so is only local 7 hours weekdays, and 4 hours weekends, when it should be:

06:00 – 19:00 weekdays – 13 hours

06:00 – 18:00 Saturday – 12 hours
06:00 – 16:00 Sunday – 10 hours
Therefore, it would have 35 hours of local programming a week if my math is right.

For Hits Radio Manchester, it should be a regional only for Greater Manchester, and programming cannot be shared with 97.4 Rock FM, Radio City or Radio Aire during the daytime and it has to be standalone from these three, with a requirement for speech in daytime that is meaningful, and only programming of a specialist nature from 6pm-6am as defined later on.

These requirements should also apply to 97.4 Rock FM and Radio City 96.7, with Rock FM's TSA expanding to cover Burnley, Accrington, Rossendale, Hyndburn and Blackburn areas.

Lancashire

97.4 Rock FM (Preston)

Staffordshire & Cheshire

Signal 1

West Midlands

100.7 Heart FM

Free Radio Birmingham

Free Radio West Midlands

Signal 1

Signal 107

East Midlands

GEM 106

Capital East Midlands

Capital East Midlands cannot share programmes with Capital Birmingham and must be local for 13 hours weekdays, 12 hours weekends, 10 hours Sunday

GEM 106 cannot network with Free Radio Birmingham or any Bauer station and should have local content obligations including enhanced news

Glasgow

Clyde 1

West FM (co-located with above)

Although in the same approved area, the status quo should remain

Edinburgh

Forth 1

Cardiff

Capital FM South Wales

Wrexham & Chester

Heart North Wales (should not be allowed to take programming from Heart North West)

In terms of networked output, Saturdays can only be networked from outside the TSA if the programming is “of a specialist nature”, therefore any music of these genres would fit the description:

- Dance music
- House music
- R ‘n’ B
- Chillout
- Urban music
- 70s/80s classic hits

Sundays should be networked from 4pm onwards (taking into account the chart show) and the rules would be relaxed on local output, with networking from 4pm-6am.

These amendments would also apply in Scotland and Wales too.

For these stations, networking can only be regional, so must be produced from within the TSA or TSAs bordering the stations listed (so London-based programming, except for the chart show would not count, unless the station borders London).

For example, Signal 107 could share programming 10pm-6am weeknights. Saturdays 6pm-6am and Sundays 7pm-6am with Signal 1 in Stoke-on-Trent but the networking could not be shared with other Wireless Group stations.

Heart Gloucestershire could take networked

	<p>programming as long as local breakfast and drive remain, but should have two local shows at a weekend.</p> <p>These stations have studio space which should be used, so it does not lay idle due to networking.</p> <p>There should also be an amendment stating:</p> <p>If a station owner is a franchise-holder (cf. Heart North Wales, Smooth East Midlands, Heart 96.6 Hertfordshire, Capital Scotland) then it cannot share programming from bordering stations with different owner – so Smooth East Midlands (Communicorp) could not share with Smooth West Midlands (Global Radio).</p> <p>Stations that produce specialist content like Smooth Radio, XFM, Real XS should be exempt from locality requirements on a case-by-case basis, although for Smooth, local breakfast and drive should apply.</p>
<p>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.</p>	<p>The current proposed approved areas do not make any sense, from a marketing viewpoint and a social POV.</p> <p>The South of England is too large an area editorially to be considered as one area, and the listener in TSA of stations like in Luton, Milton Keynes etc. do not feel much affinity with those in towns like Maidstone, Rochester, Epsom, Bromley, Brighton etc.</p> <p>Merging the West Midlands and East Midlands into Central is not something that would make much sense commercially.</p> <p>North West of England is controversial in itself, since some areas bordering it do not consider themselves a part of it, even though geographically they are in it. 2BR FM's TSA covers just into the border of the North West itself, while Pulse 1 West Yorkshire and 97.2 Stray FM also cover onto the edges of the North West, but should not be considered as North West Station.</p>

Manchester, Liverpool, Preston, Burnley, Wigan, Bolton, Lancaster, Carlisle should be considered separate areas for programming purposes and not part of a greater “North West”.

From a cultural and social POV, the West and East Midlands have a wide gap culturally, and are very different in many ways – demographics, economy etc. so merging them into the “Midlands” makes no sense in this regard.

Yorkshire should not be merged, as this makes no sense for East Yorkshire, which works better as its own standalone area.

For example, South Yorkshire and West Yorkshire share a border, but are very different culturally and socially, despite being in close proximity.

In the U.S., proposals were made in the mid-2000s, around mid-2004, pre-GFC (global financial crisis) to merge stations which covered a portion of California (near Los Angeles, not within the city, but within Los Angeles County) but there was no public support for this and the regulation at the time prohibited it.

The approved areas should ***not*** change in any way, instead, if stations want to expand their area, they should apply to Ofcom and it be looked into on a case-by-case basis.

Editorially, aligning stations to ITV regions makes no sense for geographical reasons, given the size of the United Kingdom geographically and economically. If the United Kingdom was the size of the U.S. and had multiple counties (analogous to a U.S. state, from my understanding) then it would make more sense.

The United Kingdom is too small to support aligning stations by television region.

In general, the rule should be “if you have studio space, use it, but you cannot merge with the neighboring station except in extenuating circumstances”.

Due to social media, listeners are more knowledgeable on locality even if they do not understand the full ins and outs – people have become this of television shows.

From what I know, listeners to these stations would be completely dissatisfied if no programming was local:

Hallam FM

Rock FM

Capital East Midlands

Capital Birmingham

96.7 KLFM Norfolk

Heart Bristol 96.3

Radio Aire 96.3 Leeds

Viking FM 96.9

Stray FM

Pulse1 (97.5/102.5)

Signal 107

Signal 1

102.4 WISH FM

107.4 Tower FM

107.2 Wire FM

In networking terms, Capital Birmingham and Capital East Midlands should not be allowed to become one supraregional station due to the issues mentioned. Also, by comparison, Capital East Midlands has a far more rural TSA in parts compared to Capital Birmingham which only covers the city of Birmingham and surrounding areas.

Research by Yelena Hadid (stage name Gigi Hadid, former Victoria's Secret model) in early 2017 found that 83% of British people wanted more locally-presented radio, with only 17% wanting to keep the status quo. This research is no longer available online, but was distributed via piracy download sites for some time.

The survey covered all ages, not one specific age group, and was part of a marketing survey.

Additionally, there have been some issues with the new approved areas on social media from individuals who have seen the map of proposed areas online, with many people in Gloucestershire not wanting Heart Gloucestershire to have all programming from

	<p>Bristol, and the same for Heart South West ; Exeter, Plymouth, Torbay, Cornwall.</p> <p>There has been quite a lot of concern from individuals about loss of local stations and programming due to the proposed amendments.</p> <p>Listeners of these stations want more local programming not less and feel that Ofcom should amend the rules to force this:</p> <ul style="list-style-type: none"> - Clyde 1 - Hallam FM - Hits Radio Manchester - Capital Birmingham - Capital East Midlands - Radio Aire - Metro-Radio - Viking FM (people feel it does not editorially fit into Yorkshire, and should be its own region) - Heart Scotland (general consensus is that only 2 local shows daily is not popular, and London-based programming is not as popular as people want, plus people want more speech content in daytime). - WISH FM/Tower FM/WIRE FM based in Orrell, Wigan <p>At Ofcom, you need to complain to Department for Digital, Culture, Media and Sport and point out that deregulation of radio goes against what the listeners actually want.</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>My own original research has discovered listeners value locality, and what would qualify as local content should be:</p> <ul style="list-style-type: none"> - Local events - An issue of pertinent local relevance to the community - Local new music - Local politics – as part of news coverage

A station that relies on showbiz content for 90% of its output and generic links – such as Heart – should change in light of these guidelines.

Speech output is a major issue, with my own research findings demonstrating this (names changed for anonymity purposes):

“I listen to Capital East Midlands, but the presenters hardly talk. Have to listen via Amazon Alexa to American stations to find good ones with mixture of music and talk”

Janine, 34, Nottingham

“Rock FM was good in 2003, but I’ve started to use my Alexa a lot more to find American stations that sounded like it was then, one in Detroit sounds better, and at least they’re allowed to talk.”

Michelle, 41, South Ribble

“Good music, good news, but they don’t talk much, do they? I used to listen a lot to Capital East Midlands, but have had to find new stations with a decent mix of talk and music.”

Rachael, 26, Rushcliffe, Nottinghamshire

“Heart 100.7 was great back in the day. 2004, actually. Now they hardly talk, it isn’t as local, and it’s [expletive removed] awful. I’ve gone over to a great Toronto rock station when my wife got me an Alexa for Xmas.”

Dave, 42, Rednal, nr Birmingham

Stations need to have a quota for speech and this should be defined within these rules.

Speech needs to be a ratio of around 40:60, i.e. 60% music, 40% speech, with no speed-links (i.e. the presenter is there only minimally), and this regulation should apply and be enforced on the proposed new CRS (“city region stations”) I mentioned above.

Speech should be defined as links relating to the area, without it just being wholly local references or wholly showbiz – it needs to have both over the full length of the show (for example, a 10am-2pm show would need both).

The only exception to this is a phone-in show where music is not a part of the programming's USP – e.g. LBC.

Content is clearly important, and I have seen several social media discussions about this.

One prominent Instagram star, noted for her pictures of herself in athleisure wear actually had a photo of a radio station with the text "BRING LOCAL BACK" in May 2017.

She is a fairly prominent name in the field of female workouts/athletics but not a professional athlete, yet she is in the target audience for Capital (18-35) being born in 1992, and is an example of social media playing a part.

There is evidence, as of the U.S. elections in 2016, that local radio played a part in the response after the controversial election.

In terms of news coverage, the rules should stay the same, aside from enhanced news and local hours being done on a case-by-case basis.