

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>No. Localness on local commercial radio stations cannot be satisfied by a reduction in programming.</p> <p>I have seen how many stations in major Canadian cities have managed to retain localness, despite networked (syndicated) programming, and this could work for British stations.</p>
<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>I only partially agree with the proposed guidelines, but have a different interpretation.</p> <p>Certain stations should be designated “city stations” - serving major English cities, and these should not be allowed to take programming from the nearest large city, except for specialist shows.</p> <p>These city stations should be:</p> <ul style="list-style-type: none"> Heart Edinburgh/Glasgow (Heart Scotland) 96.3 Radio Aire Leeds 96.4 Free Radio Birmingham 96.5 Capital FM East Midlands 96.7 Radio City 96.9 Viking FM Hull 96.9 Signal 1 Stoke-on-Trent 97.0/102.3/102.5.103.3 Clyde 1 Glasgow 97.1 Metro Radio Newcastle-upon-Tyne 97.3/97.6/102.2 Forth One Edinburgh 97.4 Rock FM (as it is in the City of Preston) 97.4/103.2 Capital South Wales - based in

Cardiff

97.4/102.9 Hallam FM - since Sheffield is a historical city

100.7 Heart West Midlands (Birmingham)

102.4 Wish FM Wigan

103.0 Heart Cambridge

104.7 Minster FM York

105.4 Heart North West based in Manchester

106 Gem 106

106.2 Heart London

107.2 WIRE FM Warrington

107.4 Tower FM Bolton

“Specialist programming” would be defined as any programming where it is over 50% of a certain genre, e.g. a dance music show Saturday night 6-10pm or chillout music 10pm-1am (using Bauer Media’s Hits Chilled as an example), and it would not have to originate from the TSA.

The stations listed would be expected to produce local programming 6am-1am, with the exception of networked specialist shows and the chart show Sundays 4-7pm.

For 102.4 Wish FM, 107.2 WIRE FM and 107.4 Tower FM, these are a network in themselves, and should not be allowed to take programming from Stoke-on-Trent, instead networking can only be from Wigan between the three, aside from specialist programming and the chart show.

The other Wireless Group stations – Peak FM, Signal 107, The Wave, 96.5 The Wave would be allowed networking from Stoke-on-Trent.

Signal 1 would have to remain local 6am-7pm, but could network 7pm-6am with other stations at its discretion due to the TSA bordering on rural stations (see later point in this reply).

Although Wigan, Bolton and Warrington are not cities in the traditional sense, I’m using the term “city” very loosely, since these are Metropolitan Boroughs, and borough is from Old English burh meaning “city”, so historically they would have been seen as a city.

In general, if a station covers a large city as defined in this list:

Birmingham
Bolton
Cambridge
Edinburgh
Glasgow
Kingston-upon-Hull
Leeds
Liverpool
Manchester
Newcastle-upon-Tyne
Sheffield
Stoke-on-Trent
Warrington
Wigan
York

“City stations” could not co-locate (with the sole exception of 102.4 WISH FM/107.4 Tower FM/107.2 WIRE FM and 96.4 Free Radio Birmingham co-locating with Coventry & Warwickshire) therefore these situations could not happen:

Hallam FM could not move from Sheffield
Viking FM could not move from Hull
Radio Aire could not move from Leeds

etc.

Locally-made programming is a cornerstone of broadcasting on American and Canadian stations, and in my research, I have seen how many independent Canadian stations in Vancouver still manage to be local 6am-7pm (London time equivalent – 10pm weekday – 11am weekday, going by subtracting UTC), and I have seen how, in these Canadian markets, listeners find local programming to be interesting and enjoyable.

The only exemptions for locally-produced programming should be for stations where it is primarily rural or quasi-rural and it cannot support a full local station, such as these stations:

Capital East Midlands 102.8
Capital North Wales

Heart North Wales
Heart Gloucestershire
Heart Thames Valley
Heart Wiltshire
Heart South West
Heart Cambridgeshire
The Breeze network
Smooth Radio network

For London, certain stations should not be allowed any networking at all, aside from the chart show or specialist programming, given the capital's status.

These stations would be:

95.8 Capital FM
100.0 KISS 100
106.2 Heart London

The only real exemption to these rules for the stations should be the use of remote voicetracking, provided the presenter has a working knowledge of the TSA, or pre-recorded shows provided they are open in the public file on use of pre-recording.

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.

The current approved areas make more sense than amalgamating them into new regions, and it would be costly to licensees of stations trying to get used to new geographic regulations on approved areas.

Amalgamating regions works better in larger countries such as the U.S., Canada and Australia, not in a nation like the United Kingdom which is far smaller

The West Midlands and East Midlands are culturally different, and not just "Midlands", as an example.

The current approved areas is broader, but makes more sense, so that if a future applicant for an FM or DAB license wishes to apply, they can accurately target the areas they want to broadcast to.

	<p>The current scope for: Central North East of England North West of England Etc.</p> <p>Is too broad and it is divisive in areas where some people may not consider themselves as living in the North East or North West, e.g. Todmorden which is in Yorkshire, but considered a de facto part of Northwest England by many people, and this was reflected in advertising publications locally, and Todmorden receives overspill from both Northwest and Yorkshire stations.</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>I have a different opinion on this, in that in terms of local material, with regard to the proposed “city stations”, their speech content must be more than a speedlink – like it was around 2001-2004, when presenters talked about things the audience could engage with.</p> <p>Although 2001-2005 was a pre-social media era, relying on phone calls, email, texts, it encouraged audience interactivity, and radio stations should have the presenters speaking more about things the audience can relate to and the local area, in addition to, not replacing, showbiz news and promotions for competitions.</p> <p>Speech content has to be defined as “relevant”, so depending on the license, this has to be taken in broad strokes.</p> <p>A station like Hallam FM or Clyde 1, for example, needs to balance the mix of local discussion with showbiz stories, but cannot have it being exclusively one or the other.</p> <p>This also applies to Heart and Capital networks, where there is minimal presenter speech currently (“speedlinks” in industry jargon).</p> <p>In terms of amendments, a station should have a commitment to having a level of speech required for audience participation, and not</p>

just non-stop music with minimal presenter interaction.

If there is automation, i.e. no presenter, than this should be an exemption from the rules as long as they make Ofcom aware of when there is automation – e.g. Jack FM, Sunshine Radio, 2BR FM 10pm-6am weeknights and 10pm-6am Saturday, 6pm-6am Sunday as an example.

In terms of localness guidelines, if it is too impractical to travel between studios, an exemption could be made for remote presenting, for example:

Drivetime presenter 3-7pm Monday-Friday on 96.3 Radio Aire wishes to do cover work
10am-2pm Monday-Friday on 96.9 Viking FM
- currently, impossible in travel terms, but he should be allowed to do it remotely from Radio Aire studios.

In terms of local news, stations should be allowed either local news or enhanced local news, within the guidelines, with no change needed to the regulations.

However, all suggestions I made regarding programming, not news should be investigated, as these may be relevant to many local groups.