

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. Programming being made miles away from the area it is being broadcast too is not necessarily going to be very good at localness. The team working on the programme would be under no obligation to ever even visit the local area.</p> <p>There is also only so much that can be done with 'split links' on network shows. These are a way of including local content on networked shows, and at very off peak times such as overnight are an acceptable economy measure when few are listening. However during daytimes their limitations are not acceptable. They may need to match links to other parts of the network in terms of length, reducing the ability to respond to local events, and there are only so many 'split links' network presenters can do in a short space of time. If there are multiple important local events happening in different parts of the country at once, some unplanned (e.g. major accident or news story) networking would impose logistical restrictions on how local different licenses could be.</p> <p>The way to overcome these issues is to mandate locally made programming during most daytime hours 7 days a week. As noted above at very off peak times it is unreasonable to expect a local service from commercial radio.</p> <p>These proposals are one step away from killing off local commercial radio entirely and leaving the BBC as the only providers of local radio. As excellent as BBC local radio is, this would reduce media plurality. In addition BBC local radio is largely aimed at older listeners and is very speech heavy. Younger listeners and/or those wanting more music mixed in with local content would have no alternative.</p>

	<p>Ofcom and the government need to change policy and protect local radio before commercial local radio is killed off entirely and commercial local media more generally becomes smaller and smaller. Instead of relaxing restrictions, Ofcom should be maintaining and enhancing them. If radio station owners do not like that, they can always hand back their licenses. National DAB provides opportunities for non-PSB radio and more choice of music.</p> <p>The maintenance of local news is welcome, but a couple of minutes of headlines an hour and the odd split link is not high quality local radio.</p> <p>In addition, what assessment has Ofcom done about the potential for job losses with it's proposals? These proposals have the real potential to lead to redundancies.</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>No. Current guidelines should be maintained and ideally enhanced. Please also see my response to Question 1.</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>No. If anything the concept of approved areas should be removed entirely, with stations required to broadcast local shows from within their license area. Please also see my response to Question 1.</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>	