

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.</p> <p>Being able to serve a local area and satisfy 'localness' is why these licenses were created in the first place</p> <p>To reduce the hours of locally made programming by very definition has an impact on 'localness' and given the reductions that were approved eight years ago, most operators now only have to provide a service which is not fully local as it is.</p> <p>Ofcom's own research shows between a fifth and a quarter of people value local presenters. In any other line of business, no-one would get rid of something such a large portion of consumers value.</p> <p>Cutting locally made programming would appear to be against Ofcom's duty to secure it and would have a knock-on impact to the wider media landscape. It would also (almost certainly) lead to fewer broadcasters with regional accents making it onto national networks, which draw on local and regional talent pools.</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.</p> <p>Ofcom's consultation mentions the costly studios and presenters that locally-made programmes require.</p> <p>With the number of presenters having been cut dramatically in local radio as a result of regulatory changes eight years ago, the cost-base has been hugely reduced.</p> <p>Many radio operators still opt for very substantial city-centre studio operations. They don't need to spend so much on these – why don't they relocate to cheaper buildings rather than wanting changes to regulation – which</p>

would also probably hurt their revenue generating operations, because those are based in the same studio centres?

Given the operators knowingly bought licenses that had these restrictions, given that the Radio Centre has hailed this year as the best for ratings and revenue, it is hard to see that these proposals benefit listeners. 'Localness' and listeners will be disadvantaged by these proposals, not to mention those who work in radio around the UK. The only beneficiaries would appear to be the large, profitable radio operators who are already seeing revenue growth within the current regulatory framework.

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.

No

This part of the proposal is the one that appears to completely dispense with the idea of securing localness.

The largest proposed region outside London is the Midlands. The current regulatory arrangements are already stretching the idea of "local" given the lumping together of Leicester and Nottingham. However to have such a huge population area such as the West Midlands joined to a very different area such as the East Midlands is hard to justify. As it is, ITV has already uncoupled these two regions due to the impossibility of covering both. This huge 'super-region' needs looking at again or at very least dividing in two.

Northern Ireland has different regional, religious and geographic issues to Northern Scotland. Quite how you provide 'localness' to a crofter in Skye and to a community in Belfast at the same time seems fanciful. This does not match Ofcom's stated duty of securing 'localness'.

North and South Wales aren't the same just because they are in the same country. Welsh speaking areas should be handled separately if they can be combined.

	<p>Most of these regions seem to big – the South West in particular.</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 evidence which support your view.</p>	<p>I agree in part</p> <p>I agree with the less stringent policing of what constitutes “local”, because regulating this is a minefield. But the rest of the consultation proposals negate this through the overall lack of localness which will result.</p>