

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>Please see answer to Question 2</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 do not agree with the proposed amendments to the localness guidelines relating to locally-made programming.</p> <p>I do not believe a three hour show is enough to contain any meaningful local content which in turn would mean that Ofcom’s duty to secure localness is not satisfied.</p> <p>I believe a three hour show could be produced as a token gesture.</p> <p>My preference would be for the current minimum hour requirements to remain at least on weekdays or for a slight reduction but for stations to have flexibility to schedule this anytime within daytime.</p> <p>However, I recognise there is need for some change so I would like to make additional alternate suggestions in relations to the points made in the consultation document:</p> <p><i>Point 3.7: “Locally-made programming is relatively costly for commercial radio companies to make because of the need to maintain separate studios and presenters, when programmes can now technically, and often more efficiently, be made centrally. “</i></p> <p>I agree with this point particularly in relation to</p>

studios and technological advances.

I would suggest Ofcom could adopt the new approved areas, or a variation, for co-location purposes only. Any other existing programme and news sharing areas could remain in place.

Using Touch FM in Coventry as an example. They would still be allowed to share programming and news with any station in Birmingham and Warwickshire area but could now be based anywhere within the Central region.

Point 3.8 - Ofcom's "research evidence does not suggest that there is a need to consider locally-made programming at weekends separately from weekdays."

Taking this into account maybe minimum number of hours to be locally-made should be set as a figure across the whole week during daytime instead of per day.

This could include a slight reduction in local hours. One idea could be for the following minimum requirements of local programmes per week to be broadcast anytime within daytime. A possible example could be:

- 30 hours for stations providing local news at least hourly during weekday daytime and weekend peaktime
- 40 hours for stations providing local news during peaktime hours.

I believe this would give stations flexibility of where to schedule local output and reduce costs but still provide a sizeable amount of local output across the week.

Point 3.15 - "We are not proposing to amend our guidelines relating to the provision of locally-made programming by stations broadcasting on AM (medium wave)."

If the proposals for FM stations are adopted it would create a situation where most AM stations would be required to produce more programming within the station's nation then

	<p>their FM counterpart.</p> <p>For example in Edinburgh Forth 1 on FM will be required to do less programming from within Scotland then Forth 2 will do.</p> <p>I would suggest that Ofcom could implement one of the following options:</p> <ol style="list-style-type: none"> 1. Reduce the minimum requirement for AM stations to produce programming within their nation to the same number of local hours required by FM stations. 2. Introduce a nation requirement to FM licences (to either 7 or 10 hours dependent on their current minimum local hours).
<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>I think Ofcom should consider the following in relation to the new approved areas:</p> <p><u>The Current Home Counties Approved Area</u></p> <p>I propose this could be better placed in the proposed East of England approved area.</p> <p>This would match the ITV Anglia and BBC East television regions. It would also match the region that BBC local radio stations network at night-time and weekend afternoons.</p> <p><u>The Current Solent Approved Area</u></p> <p>I believe this could be better placed in the proposed South of England approved area.</p> <p>This would match the ITV Meridian and BBC regional TV and local radio sharing network. Indeed both of these regional TV shows come from the Solent approved area.</p> <p><u>Splitting Existing Approved Areas</u></p> <p>I believe it might be appropriate to split at least two of the existing approved areas <u>where no existing programme sharing or co-location exist</u>. This would mean the area greater match TV news regions.</p> <p>My suggestion is the current Lancashire and</p>

	<p>Cumbria area is split. North and central parts of Cumbria could be placed in a new North East & Cumbria multiplex to match the region used by the BBC for both regional news and local radio sharing.</p> <p>In addition in South West Midlands Gloucestershire is placed in the West of England approved area. BBC Radio Gloucestershire is long established as part of the West region.</p> <p><u>Silk FM</u></p> <p>Silk FM forms part of the Central approved area.</p> <p>However, the area served by this licence is within the Manchester commuter area and is covered by ITV Granada news and BBC North West Tonight. In addition, Macclesfield falls in the RAJAR survey area of the commercial Manchester wide services.</p> <p>I propose this is moved into the North West approved area.</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 believe an amendment could be made to reflect the results for the reasons for listening to local commercial radio in the research Ofcom commissioned.</p> <p>In the research local traffic and travel updates is the third highest reason for listening to local commercial radio stations and local weather information is the sixth highest reason.</p> <p>The local news provision section of the guidelines could be renamed “local news and information provision” with requirements for travel updates and weather information added.</p>