

## Your response

Question	Your response
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.	No. The majority of local commercial radio stations already produced very little locally-made programming. Often, within the hours of locally-made programmes, whilst the shows are produced within the region there is no effort in providing information relevant to the area. Instead there is often more effort in following the brand style (such as Heart), with any conversation relating to topics such as celebrity news/gossip.
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.	No. As I work shifts, I often miss the limited number of locally-made programmes, and decreasing the number of hours of locally-made programmes would make it harder for me to listen to locally-made programmes. I would suggest a minimum 8 hours of locally-made programmes between <b>7am</b> and 7pm, regardless of news provision. I would also like to see FM and AM stations using the same guidelines, considering that a large number of AM stations are now available on DAB.
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.	I'm split down the middle with this one. I like the idea of a more simpler structure of approved areas by mirroring ITV regions, but I think these areas will be too large to allow provision for relevant local information.
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.	No. I believe that local material works better if produced within the area the station broadcasts. Locally based presenters have a better understanding of the area they are serving.

## I would also like to add the following points:

Whilst it has been noted by several individuals and organisations that local radio stations face greater competition from digital stations, the two largest local radio station operators Bauer Media and Global, also operate a vast number DAB stations. Not only do they have a significant monopoly on commercial analogue radio, they have a combined monopoly on digital radio as well.

These two groups also have been able to make significant savings in studio costs. For example, Capital North East and Heart North East (both owned by Global), and Smooth North East (owned by Communicorp under franchise to Global) share the same studios in Newcastle upon Tyne.