

## Consultation response form

Question	Your response
<p><b>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.</b></p>	<p>Confidential? – N Yes.</p>
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>We do not believe that Ofcom’s proposals go far enough.</p> <p>We believe all AM and FM stations should be free to provide the programming output they believe is most relevant for their broadcast area, as long as they are providing a DAB simulcast or a separate digital service provided by the same Ofcom licensed company, and as long as they are providing local news.</p> <p>The investment made by stations to multi-platform transmission should be rewarded with the freedom to innovate.</p> <p>If a licensee does not commit to DAB carriage, where similar digital coverage is available, then these stations should be kept to a more restricted format.</p>
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>We are pleased that DCMS accepted representations that operating commercial radio services in the Nations should not be subject to additional regulation.</p> <p>We are also pleased to see the single approved area proposed for Wales.</p> <p>However, we believe the suggested approved areas are, in some cases, illogical and inconsistent.</p>

	<p>Ofcom states that the Westcountry TV area is “disproportionately small” compared to the size of most of the other approved areas and therefore that it should be aggregated with the rest of the south, yet it proposes a “North Scotland” area whose population would be smaller than Devon and Cornwall. The population in the proposed North Scotland area is the smallest on the mainland UK.</p> <p>Similarly, Ofcom states that the Border ITV region is “also small in population terms”.</p> <p>Oddly, rather than keeping the Borders in Scotland, Ofcom proposes it is placed in North West England.</p> <p>We submit that, with two approved areas, Scotland is being treated inconsistently and unfairly with other UK nations - Northern Ireland and Wales – despite sharing characteristics of having relatively small populations that are geographically widely spread.</p> <p>The proposed north Scotland area is a large geographic area with limited population. A number of the local stations serve very small populations. It clearly makes sense to make Scotland a single area</p>
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>Consistent with our response to Q2, we believe that all stations that provide a DAB simulcast, or provide a digital only service through the same licensed company, should have the freedom to provide whatever programme service it believes is relevant and popular for local listeners. Local news provision should be the only prescribed content commitment.</p>