

## Consultation response form

<b>Consultation title</b>	<b>Localness on commercial radio</b>
<b>Full name</b>	Stephen Orchard
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Quidem

## Your response

<b>Question</b>	<b>Your response</b>
<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>We do agree with Ofcom’s conclusion. The research data presented in Ofcom’s consultation document is compelling. It is also backed up by The Radiocentre’s 2015 study into commercial radio listening. We would add to it, our experience as “Super Local” commercial stations that listeners’ localness expectations are also increasingly about our stations’ involvement on web based platforms, live events, and participation in (or leadership of) local community initiatives. A great deal of our impact on localness is now delivered in ways that are not confined to our hours of local broadcasting.</p> <p>The Ofcom research demonstrates that music is the main driver of radio listening – but of course music tastes are primarily national, and anyone can broadcast music from anywhere. Because of that, in our “Super Local” stations, local content has become our main competitive asset. We therefore welcome the flexibility to deliver this content with less regulatory constraint. Local content for us is an existential issue – reducing the required amount of locally made programming will not reduce the local character of our services. We would go further – the lighter the regulatory constraint the freer we are to fulfil our mission of high quality local content.</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>We support the proposed amendments. Our conviction at Quidem is that good quality local content is our greatest asset. Not only are we passionate about good <u>local</u> content, we recognise that without it many of our listeners would probably choose national radio brands. We consider the proposed amendments to be a sensible approach.</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>Yes we agree, in principle. However, the drawing of boundaries inevitably creates anomalies. In Quidem’s case Banbury Sound’s output is currently allowed (within the station’s format) to broadcast from the site of its neighbouring station, Touch FM. We therefore welcome point 4.18 in the localness consultation document which indicates that Ofcom will consider requests for approval in anomalous circumstances.</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>Yes, we agree. The proposed changes are consistent with the research findings. Quidem’s content philosophy is that the values of “localness” and “quality” are what differentiate our stations on the dial. Given how rapidly local content delivery platforms are changing, the proposed flexibility in how we deliver this content is welcome.</p>