

Your response

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<p>Question: Do you agree with our revised proposals for approved areas in Scotland and Wales? 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>Confidential- N0</p> <p>Central FM was very disappointed with the revised areas being proposed for Scotland.</p> <p>The three proposed areas leave Scotland at a considerable disadvantage to the rest of the UK and if these were to be enforced could result in Scottish Commercial Radio and future DAB investment being placed at considerable risk.</p> <p>These proposals vastly reduce the ability for radio operators to serve local communities utilising new, progressive broadcast solutions and technologies and will threaten their viability and could lead to more station closures in Scotland.</p> <p>We feel this puts the short to mid-term viability for smaller FM radio stations at future risk and will dramatically reduce the ability for many of Scotland's stations to reach a DAB future.</p> <p>Restricting radio operators to three areas will force existing operators to spend money on bricks, mortar and buildings rather than invest in people, careers and services.</p> <p>That any such areas will hamper existing radio operators to compete with new digital services such as DAB and internet radio stations (webcasters) and will likely lead to further station closures in the mid to long term.</p> <p>We share the Scottish Governments concerns about the preservation of localness and relevant local services</p>

however, totally disagree that implementing any defined areas in Scotland will serve to protect this. Indeed, we strongly feel that this will inhibit the growth and development of services and reduce the opportunity to expand and enhance services.

We believe there should be more radio services and stations across Scotland rather than less which could be the unintended consequence of implementing these areas.

We feel there are numerous areas, not least the Scottish capital where there is a strong argument for further FM radio licencing in the intervening and lead up period to a DAB future which we see at least five or more years away for Scotland.

In conclusion

There is no doubt in our mind that these areas will be wholly inadequate for the mid to long term future of Scottish radio and will leave operators with little to no scope to embrace new broadcast techniques.

We urge Ofcom to reconsider Scotland as one area and enable the freedom and flexibility afforded to that of our English and NI counterparts and that an urgent review be carried out to ensure **Scotland is making best commercial use of FM spectrum.**