

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- NO</p> <p>DCT were 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 DC Thomson reconsidering its immediate proposed investment budget for Scottish Commercial Radio and future DAB investment.</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 investment strategy for many larger media companies at risk and will adversely impact the growth of DAB investment in the mid to long term.</p> <p>Last year we rallied to the aid of Wave 102 which had run into financial difficulty and we have been increasingly concerned about the restrictive nature with which FM radio stations are expected to operate. In particular, the unfair size and scale of FM stations comparatively to the heritable broadcasters and the continued roll out of community radio stations who appear to have exclusive access to FM spectrum. We were hopeful that the prospect of a vastly relaxed regulatory approach would give fresh impetus to a very stagnant and limited Scottish Commercial radio landscape.</p> <p>Restricting radio operators to three areas will force existing operators to spend money on</p>

bricks, mortar and buildings rather than invest in people, products and services.

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.

We share the Scottish Governments concerns about the preservation of localness and relevant local services 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.

As new comers to this sector we have been surprised at the restrictive nature with which radio is regulated and how few opportunities are provided for to expand and grow radio, particularly in Scotland.

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 leaves 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.

