

Your response

| Question | 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>We disagree with the revised areas for Scotland.</p> <p>The three proposed areas leave Scotland at a considerable disadvantage to the rest of the UK, digital rivals new to market, DAB services and fails to provide flexible future proof working practices for almost all operators both large and small across the Country.</p> <p>These proposals vastly reduce the ability for radio operators to serve local communities utilising new, progressive broadcast solutions/technologies and will threaten their viability and likely lead to more station closures in Scotland.</p> <p>The first to fall will be the smaller commercial radio stations serving super local areas, we were sad to see the demise of NECR earlier this year which in our opinion was unable to be rescued due to the onerous regulatory obligations.</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.</p> <p><u>Scottish Government Response :</u></p> |

We are concerned that the Scottish Govt response in the earlier consultation has had an unintended consequence which has led to an unfair and punitive regulatory framework for Scotland's radio operators. That this will divert investment away from people and commit radio operators to mostly empty buildings and prevent investment in new progressive broadcast technologies.

In fact, we recognise the Scottish Government's concerns about the preservation of localness, relevant local services and share this concern.

However, we believe this should be protected and enhanced by increasing services across Scotland rather than restricting the few existing services that might survive the next ten or so years.

The Scottish Government's concern would be addressed by increasing the number of radio services across Scotland's Cities and rural communities and that despite many years of New Wave Media campaigning for this we feel our calls have been ignored.

For example, we agree with the concerns expressed about a dilution of local news and content cited by the Scottish Government regards Edinburgh. Indeed, we would ask the question '*why is there only one dedicated radio station serving Scotland's second largest and highly affluent Capital city?*'

A point we have raised several times over the past ten or so years. In fact, we feel Scotland has been woefully neglected and vastly underdeveloped by restricting FM expansion almost exclusively to that of 'not for profit community radio' stations. We feel

there is both market and audience capacity in the following areas:

Angus, Ayrshire, Morayshire, Inverness as well as Edinburgh the Lothians.

Ofcom Advisory Committee for Scotland

Given the similarity between the Scottish Govt's response and the ACS's response we feel all our earlier points should be reiterated with one further point.

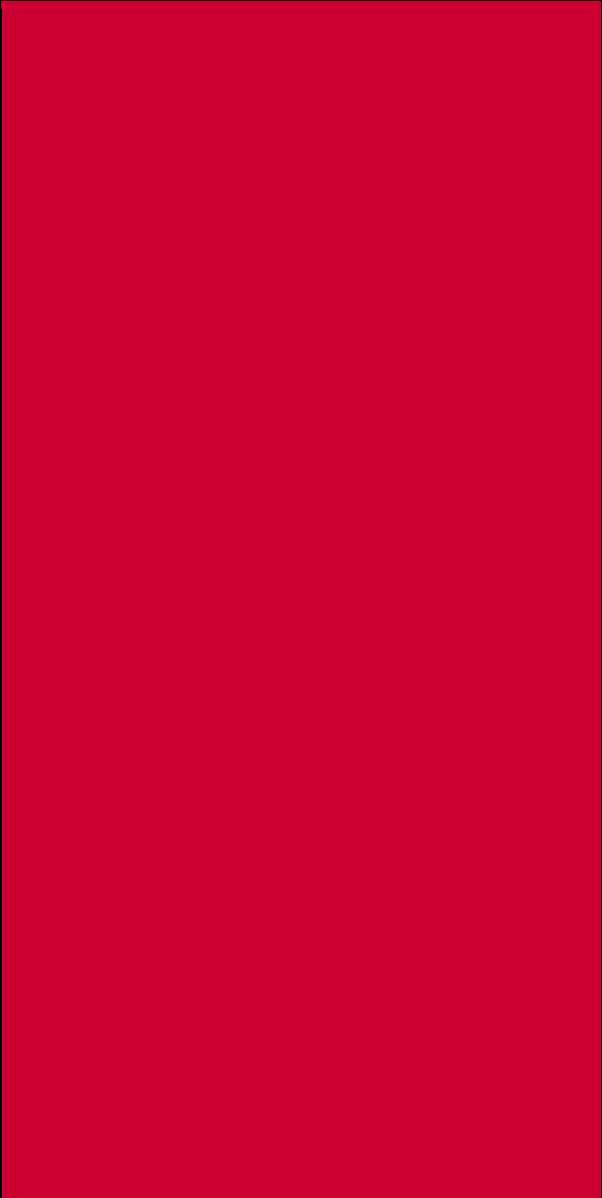
We noted the reference of the SAB's belief that '*Scottish identity is complex*' which we interpret as a reason the SAB believe Scotland's radio sector should be singled out from the rest of the UK as some sort of 'special case' or territory.

We fundamentally disagree. This is no more so the case than that of Manchester and Liverpool, Newcastle and Sunderland, Lincolnshire and Yorkshire and so the list goes on.

Trying to silo Scotland into historical territories flies in the face of how Scotland should progress as a nation and inhibits cross cultural understanding and facilitates insular and parochial thinking.

Scotland, like most of the UK has a rich stretch of diversity from a variety of cultures which is likely to grow over the coming years. We believe most modern Scots take a global, collaborative and progressive approach to their nation whilst maintaining a strong appreciation of where they live and their communities including those who have settled here and call Scotland home.

In conclusion



We should consider these revisions through an ever evolving landscape of increased digital competition, increased advertiser migration and that this regulatory framework will likely need to see radio through another decade.

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

That three border territories will leave all of Scotland's radio stations in an economic void and will lead to services disappearing altogether.

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 which clearly is not the case.