

Your response

Question	Your response
<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>Waves FM 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, especially the North of Scotland and fails to provide flexible future proof working practices for almost all operators both large and small across Scotland.</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 their local areas who are already under threat from a tsunami of community radio stations which have been licenced on an almost exclusive basis with little regard to the impact on existing commercial radio stations.</p> <p>Restricting Scottish 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>

Waves FM recognises the Scottish Governments concerns about the preservation of localness, relevant local services 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 five or so years.

We feel particularly aggrieved towards the arrival of a community radio station which has been allowed to 'set up shop' on our door step, whilst we are expected to continue our considerable expense and commitment to DAB in the North of Scotland whilst being denied FM expansion opportunities.

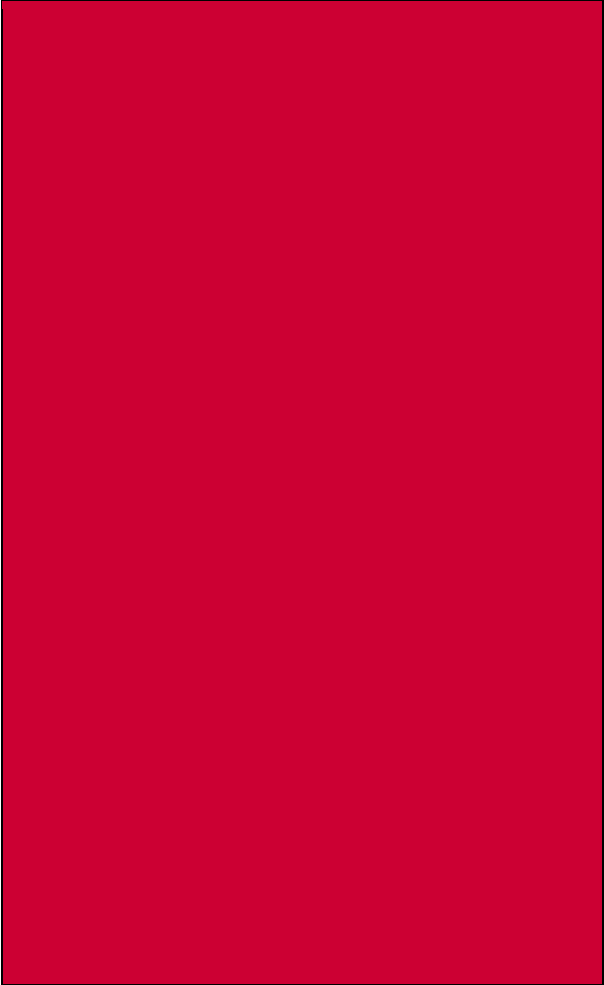
Then to have a more disadvantaged and punitive regulatory frame work imposed upon the north of Scotland comparatively to that of the rest of Scotland let alone the UK is a disgrace and flies in the face of not only Ofcom's own recommendations but the wider direction of travel for future broadcast solutions.

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, especially the north of Scotland and feel this needs to be given an urgent review whilst considering further deregulation.

In conclusion

Scotland should be categorised as one defined area and the operators should be allowed the widest possible commercial freedom to run and serve their local audiences as they see fit.

For Wave FM, we are unlikely to take advantage of these relaxations in the immediate future. However, nor would we wish to be hampered by such restrictions in the mid to long term



future and that the future seems to arrive at a continued speedier pace. Therefore, we need these restrictions lifted today in case of tomorrow.

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

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.