

## Your response

Question	Your response
<p><b>Question 1: Do you have any comments on Ofcom's proposals to make more frequencies available for restricted services?</b></p>	<p>I am supportive of the proposals to make more frequencies available for limited coverage services as this will ensure greater usage of the spectrum. The types of services licenced as RSL's such as special events, hospital and student services are complimentary to national, local and community services.</p> <p>I believe that such services should be used for services who serve a fixed location such as a hospital or university campus.</p> <p>Current LRSL guidance has tight definitions of contiguous sites, this is not always appropriate where there are geographically close locations under a common ownership, for instance university campuses and halls of residence that may be on non-contiguous sites, but geographically close. A service with sufficient coverage to reach all common ownership buildings in a locality should be accommodated.</p> <p>I support higher power levels than current FM LRSL's, and the option of mixed polarisation transmission. Ofcom should be mindful of the likely real life reception conditions, taking into account building construction and types of receivers. For instance it is highly likely that the majority of an hospital radio stations audience will be listening on portable receivers indoors.</p> <p>There are increasingly few people listening to AM bands and many do not have receivers with AM. As such I welcome the option for student, hospital and sporting events to have dedicated services on the FM band.</p>
<p><b>Question 2: Do you have any comments on Ofcom's proposed restricted service standard form Broadcasting Act licence?</b></p>	<p>I support simplifying the licencing process.</p>
<p><b>Question 3: Do you have any comments on Ofcom's proposal to issue existing extended duration SRSL licensees with a restricted</b></p>	<p>I am broadly in support of this concept if it allows additional frequencies to be made</p>

<p>service licence on a new frequency at the end of their existing licence term, should they apply for a new licence?</p>	<p>available for other RSL use to maximise the opportunities for other operators.</p>
<p><b>Question 4: Do you have any comments on Ofcom’s proposal to issue existing LRSL licensees with limited coverage frequencies (if available) at the end of their existing licence term, should they apply to renew their licence?</b></p>	<p>I am in broad support of this concept if it allows additional frequencies to be made available for other use.</p> <p>There are significant costs for existing LRSL AM licence holders to migrate to FM. These licences are held by hospital radio services who are normally very small charities with limited budgets.</p> <p>It would be in the best interests of these stations in reaching their audience to change to a FM frequency if available. I believe that some flexibility will be needed to ensure that such a station doesn’t need to “go off-air” due to their AM licence expiring and not yet having the facilities in place to commence FM broadcasts. I propose a hybrid option where if needed on licence renewal Ofcom licence the transmission AM for a period of 6-18 months before migrating to FM.</p> <p>Similarly where an AM licence has several years to run, the ability to request a change to a FM frequency immediately would be welcome.</p>
<p><b>Question 5: Do you have any comments on these changes to our application process, as set out in the revised guidance at Annex 4?</b></p>	<p>I am supportive of simplifying the application process.</p> <p>I am supportive of the removal of current geographical restrictions.</p> <p>I am supportive of the proposal to revise guidance regarding the licence being held by a senior member of staff of the establishment.</p>
<p><b>Question 6: Do you have any comments on Ofcom’s proposal to invite the Secretary of State for DCMS to consider making an order which would provide an exception for certain services from the need to hold a Broadcasting Act licence?</b></p>	<p>I am supportive of these proposals.</p>

**Question 7: Do you have any comments on Ofcom's proposed fees for restricted services?**

I am supportive of simplifying the licence fee structure.