

Office of Communications
Southwark Bridge Road
London

RE: Limited Coverage RSL consultation

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Dear Ofcom,

With regards to your open consultation on RSL licensing we have the following points to make:-

1: LCR has no means of broadcasting to our target area through commercial DAB (no capacity and fees are too high), SSDAB (no SSDAB multiplex will cover our area as we lie outside of your “polygon”) or analogue AM/FM as you have repeatedly stated you will not be running any more rounds. We have little to no mobile phone coverage in key areas.

LCR therefore has no means whatsoever to get on air.

This fact therefore shapes our response to this consultation.

Fees payable

LCR held the longest ever issued SRSL license, a Covid-RSL which lasted over 15 months. We paid around £20,000 license fees for this license. We could not get any commercial advertising on this license, as a license condition.

Therefore we feel we are fully entitled to say your £1200 per year SRSL license fees proposed are far too low.

We feel that £1200 per 60 days as a maximum cap is appropriate. This would be around £7,200 per annum for our Covid-RSL, which is completely acceptable for the benefits derived, even without advertising permitted.

As the longest ever SRSL license holder, not-for-profit, and our longest ever SRSL had no advertising, we feel we have considerable experience in the area of fees and we can categorically state that £7,200 per year for a SRSL, even one which prohibits advertising as ours did, is not at all unreasonable.

LPAM power level and audio bandwidth

We note Ofcom proposes to increase the fees for the LPAM license product. We also note that Ofcom plans to issue licenses up to 2W on FM.

We therefore ask as Ofcom is increasing the fees and the FM power that they should set the standard LPAM power level to 2W EMRP also. With modern electrical noise and interference, 1W EMRP can be problematic and this may be why the LPAM is less popular.

We also ask that Ofcom considers permitting 9khz audio bandwidth on a LPAM license. Due to the low power this would not cause excessive interference, but for those sites that require AM (rather than FM), the increased audio bandwidth to 9khz, on a portable radio, would make AM fairly equivalent to FM.

Changing LPFM frequencies

LCR has a LPFM license on 107.5fm. Ofcom has stated they would like to move it to another frequency.

Ofcom has also stated they will not run a FM licensing round locally, and that 107.5fm is one of the only frequencies in Leicester that will sustain a community radio service.

LCR wishes to retain 107.5fm such that if a future new FM licensing round in Leicester was ever run then there would be a frequency for us to apply to run a wide-area service.

Ofcom has previously stated that if 107.5fm was vacant then it would be put “back in the pot” and could be issued to an out-of-area relay or similar, meaning that LCR potentially can never get on air as we will simply be told “no frequencies available”, as we have been told in the past.

There are no suitable frequencies above 106.5mhz locally for LCR to go onto. So if we moved from 107.5fm, we would end up below 106.5mhz, which would require new antennas, filters, etc, etc, which would cost us considerably.

It is therefore in the interests of the people of Leicester that our LPFM is allowed to stay on 107.5fm until such time as Ofcom runs an analogue FM community licensing round in Leicester.

It is also in the interests of LCR and our listeners that we stay on 107.5fm and do not have to change frequencies.

LCR has used the 107.5fm frequency in various different ways since around 1990. Therefore this frequency is synonymous with LCR for our listeners.

LCR does not care or know enough about other existing LPFM licenses to comment, but wishes to categorically state that we would object in the strongest terms to losing 107.5fm.

Legislative changes

Whilst Ofcom is asking the Secretary of State to alter legislation, we ask Ofcom to remove the “Single Contiguous Site” and “Non-Resident population” limits from the LPAM legislation.

Our 1449 LPAM today covers most of our area (below Ofcom service thresholds). It is our only means to reach our target population, many of whom lie outside the Leicester SSDAB area and are very unlikely to ever be covered by SSDAB.

Therefore our 1449 LPAM is proven to cover the area we want (below Ofcom service thresholds) but we cannot legally use it as a wide-area service due to the legislation meaning our LRSL license is for a single site.

A LPAM at 1W would be a “restricted service” by virtue of the transmit power. Typical transmitters to cover a town/city on AM are 50-300W. Sabras 1260, to cover an area only slightly larger than LCR serves (looking on the Ofcom Sabras 1260 MCA map) operates at 290W EMRP. Therefore 1W EMRP is clearly “restricted”.

There is no demand for this AM spectrum.

Therefore please invite the Secretary of State to remove this requirement for single contiguous site and non-resident population such that the LPAM license can be used for local-area services, such as “call to prayer” for religious organisations, low-power licenses to compliment SSDAB and many other purposes.

The LPAM licensing model is the only way that we can see that access to AM spectrum will be made available in the future as it is a very streamlined process. A full competitive license round is too cumbersome for the benefits to consumers of licensing new AM services.

We hope Ofcom can see that this minor legislative change is needed and an ideal opportunity to make this would be to do it alongside the changes to legislation for the ADRSL.