

Your response

| Question | Your response |
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| <p>Question 1: Do you have any comments on Ofcom's proposals to make more frequencies available for restricted services?</p> | <p><i>This is positive news as, provided power is kept low and equipment is up to standard, it's still a safe and sensible thing to do with the limited space still available subject to the part of the country involved. A limited amount of restricted available listeners in a highly-concentrated block can benefit further from not only an increase of choice but an extra lifeline to support their own restricted movements in their personal life, within good reason.</i></p> |
| <p>Question 2: Do you have any comments on Ofcom's proposed restricted service standard form Broadcasting Act licence?</p> | <p><i>Further details below as there is a possible loophole in current exemptions which, subject to written mutual individual agreement, could be opened up further thus generating an extra revenue stream for Ofcom, Performing Rights and News Organisations</i></p> |
| <p>Question 3: Do you have any comments on Ofcom's proposal to issue existing extended duration SRSL licensees with a restricted service licence on a new frequency at the end of their existing licence term, should they apply for a new licence?</p> | <p><i>SRSL licenses are not an area of concern for [X].</i></p> |
| <p>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?</p> | <p><i>Further to this year's 12 month trials, licensees should be granted permission to re-apply providing it is of Ofcom's satisfaction that each individual operation is deemed suitable to continue subject to assessment through programme quality & standards by way of monitoring logged output and site visits to ensure continued assurance of an interference-free signal and strength</i></p> |
| <p>Question 5: Do you have any comments on these changes to our application process, as set out in the revised guidance at Annex 4?</p> | <p><i>refer to my answers to Questions 6 & 7</i></p> |

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?

In relation to the current 12 month trial of low power LRSs, it is felt [S<], that the "single-site" rule should be opened up to accommodate additional "highly concentrated" geographical areas outside of single buildings / shopping centres / education campuses etc. Subject to direct and close examination from Ofcom towards the proposed licensee, a "single site" could also be extended a "single street" where the immediate surrounds of extra beneficiaries from the signal would strictly exist as a highly concentrated percentage of a district within a town or small village for example. THIS IS PROVIDED the street has a specific theme, geographical lay-out and a valid reason to have a service dedicated to it. [S<] For this reason, I would like to see either a lift in the current license exemption legislation to transmitters of 0.5 watts maximum PROVIDING Ofcom carry out an engineering test transmission to ensure confidence of no interference. Failing this, please can I refer you to my answer to Question 7.

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

I would like to see the annual license fee quoted for all previous Limited Coverage applications rolled out to the larger SRSL & LRSL applicants and existing holders. For them, the higher fees plus a non-refundable application fee, in most cases does not put them on a fair and level playing fields with the smaller Limited Coverage license holders / applicants. It's an unnecessary expense that could be better split between running costs and more frequent renewals and therefore an improvement in Ofcom's revenue stream.