

## Your response

Question	Your response
<b>Question 1: Do you have any comments on Ofcom's proposals to make more frequencies available for restricted services?</b>	<p><i>Is this response confidential? – N</i></p> <p>We support Ofcom's proposals to make use of additional frequencies for use in smaller areas. We feel this will make better use of available spectrum. We think that these limited coverage frequencies should be used primarily for services who serve a fixed location such as hospital or university campus.</p> <p>We support the proposals to licence higher transmitter powers than current Long Term FM RSL's. In planning we feel that Ofcom need to take in consideration the nature of the site being served, for instance many hospital sites are based in metal framed buildings and are subjects to high levels of local RF noise from electronics.</p> <p>It must be borne in mind that the majority of the target audience of radio stations serving hospital sites will be listening on indoor portable receivers.</p> <p>Many hospital radio stations will be looking towards these FM licences to become their main "transmission" method, as "bedside entertainment" units provided by companies such as Hospedia are often being removed or not installed in new developments or refurbishments.</p> <p>As such transmission arrangements and transmitter powers must be suitable for indoor reception on portable receivers. As such we welcome the proposals put forward, and would support the possibility of licence variations being made after broadcasts have commenced, if experience shows that changes to transmission arrangements would improve local coverage, without causing additional interference to other services coverage areas.</p> <p>We support the option for RSL licence holders to transmit using mixed polarisation if they so wish, but this should not be mandatory.</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>Is this response confidential? – N</i></p> <p>We 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 service licence on a new frequency at the end of their existing licence term, should they apply for a new licence?</b></p>	<p><i>Is this response confidential? – N</i></p> <p>We are in broad support of this concept if it allows additional frequencies to be made available for other RSL use.</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>Is this response confidential? – N</i></p> <p>We are in broad support of this concept if it allows additional frequencies to be made available for other use.</p> <p>Where the licensee is currently licenced to transmit on an AM frequency, while a move to a FM service will have many positives for the service, there will be a significant additional equipment and engineering cost involved.</p> <p>We would be in favour of some flexibility in cases were a LRSL AM licence is due for renewal in the near future. It would be undesirable for a station to have to cease their AM transmissions, due to licence expiry, before they were in a position to commence a FM service.</p> <p>If a short duration AM licence could be issued, with a move to a FM at a later date, say within a time scale of 12-18 months, once the alternative transmission arrangements have been put in place.</p> <p>Similarly where an AM licence has several years to run, the ability to request a move to a FM frequency before the expiry of the current licence would be welcome.</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?**

*Is this response confidential? – N*

We are supportive of simplifying the application process.

We are supportive of the removal of current geographical restrictions.

We are supportive of the proposal to revise guidance regarding the licence being held by a senior member of staff of the establishment. However we would note that there may be some situations where a representative of the host establishment may be a good fit as licence holder, so welcome the flexibility on an individual basis.

**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?**

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

*Is this response confidential? – N*

We are broadly supportive of simplifying the licence fee structure.