

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>Is this response confidential? – No.</i></p> <p><i>Welcomed the proposal to give more hospital broadcasting services, in particular, an opportunity to apply by extending the area for acceptance of applications to the entire UK.</i></p>
<p>Question 2: Do you have any comments on Ofcom’s proposed restricted service standard form Broadcasting Act licence?</p>	<p><i>Is this response confidential? – No</i></p> <p><i>Welcomed.</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>Is this response confidential? – No</i></p> <p><i>Seems fine.</i></p> <p><i>We would suggest that consideration should be given to protect small commercial and community radio stations in areas where this is proposed.</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>Is this response confidential? – No</i></p> <p><i>Welcomed. However the proposal is that they would remain on 50mW (para 2.16) whilst the norm for new applicants for LRSLs can expect usually a minimum of 300mW (para 2.22.11 and 2.14). This could lead to inconsistency. For example Ninewells Hospital, Dundee, is half a mile long, and served adequately (and admirably) by the Dundee Hospital Broadcasting Service, Bridge FM, using 50mW. Yet a new service in a small rural cottage hospital could be allocated 300mW. In addition, two identical establishments, which is possible under NHS planning, could be served with different power allocations i.e. an existing service with 50mW, whilst a limited service has 300mW or more.</i></p>

	<p><i>We would suggest that if 300mW is to be the norm for new applications, then existing licences should be upgraded when the new arrangements are introduced, or on renewal, to 300mW to maintain consistency.</i></p> <p><i>Whilst we are aware that the allocation of signal strength is related to the area to be covered, we wondered why 300mW was being proposed as a norm when a norm of 50mW has proved sufficient since the introduction of LRSs for hospital radio usage in 1996.</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>Is this response confidential? – No</i></p> <p><i>Content with proposals</i></p>
<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?</p>	<p><i>Is this response confidential? – No</i></p> <p><i>Content with proposals</i></p>
<p>Question 7: Do you have any comments on Ofcom’s proposed fees for restricted services?</p>	<p><i>Is this response confidential? – No</i></p> <p>This is of extreme concern. Para 6.16 states that there shall be a small increase in the overall annual fees, whilst para 6.17 states that there shall be an upper limit which would indicate that there is to be a scale of charge, presumably dependent on power allocation. On querying this with a member of Ofcom staff, I was advised that the £210 proposed charge would be standard.</p> <p>The increase from £140 to £210 represents a 50 % increase in the BA licence fee. Whilst para 3.4 advises of no intention to make any changes to the WTA licence, in para 6.16 there is mention of the increase of the WTA licence fee from £100 to £250 representing a 150% increase. Therefore the combined increase is from £240 to £450, thereby representing an increase of 87.5% to existing licences. This is a</p>

devastating increase that will affect small stations adversely, particularly ones holding more than one LRSL.

RNA holds a commercial radio licence, and currently three LRSLs, and is committed to applying for a fourth. Our service is entirely voluntary and enjoys cost-free accommodation therefore we can operate our entirely self-produced 20.5 hours of programming per day on a budget of £8,000 per annum.

The proposed increase would eventually add £810, over 10% to our recurring costs.

In effect, RNA would be charged £450 to serve a school of between 600 and 900 pupils, whilst being charged £339 for a commercial radio licence serving Arbroath, Carnoustie, and Monifieth with a combined population of over 40,000 residents or an MCA of 30,000. We would suggest that this is indicative of a charging imbalance. It is also noteworthy that there appears to be no other charging increases proposed of this exceptionally high nature across the entire commercial radio sector. Perhaps Ofcom could consider raising the application fee as an alternative as this would be a one-off payment which would be more acceptable.

We speculate that we are not the only station that would be affected by this increase which has the potential to destabilise the financial viability of small stations and would therefore request that Ofcom do not proceed with such a devastating increase that shall have an adverse affect on existing small stations.