

Your response

Question	Your response
<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? – N (delete as appropriate)</i></p> <p>We support the move. As a station broadcasting on AM, we welcome the opportunity to move to FM. RAJAR figures shows AM listening is and has been declining for a long time. Hospital patients typically don't own an AM radio they can bring in to use. The amount of interference within the building means that less than 50% of the indoor space receives a useable signal</p> <p>Tests taken during the FM trial show a signal that gives a useable to excellent stereo reception.</p> <p>The sound quality advantage of FM is a massive bonus. AM radio just can't compete with FM, DAB and online radio and music services.</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? – N (delete as appropriate)</i></p> <p>No opinion</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? – N (delete as appropriate)</i></p> <p>No opinion</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? – N (delete as appropriate)</i></p> <p>Stations should have the option to move sooner should they wish. This could be particularly important to AM stations wishing to move to FM as soon as possible.</p>

	<p>However we feel stations shouldn't be required to move from their existing frequency should they not want to and staying on their current frequency doesn't cause any frequency planning issues. This is likely to be the case for AM stations, where retaining their AM frequency shouldn't limit other or new restricted licences in the area.</p> <p>Forcing a change, could require new transmitting equipment, new jingles, replacement of branded items such clothing and signage. Some stations may find these costs prohibitive.</p> <p>As an AM station involved in the FM trial, we would like to continue on FM after the trial period. We have invested a lot of effort in promoting the FM frequency with many listeners moving across. Some wards have purchased FM radios for communal listening. Losing the FM will require further effort in getting listeners to switch back to AM, where this is even possible.</p> <p>Stations shouldn't have to re-apply as they are repeat submitting information already known to OFCOM. Unless there is a difference to the service to be provided, re-applying is unnecessary form filling for the licensee and form processing for OFCOM.</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? – N (delete as appropriate)</i></p> <p>We strongly support the change to allow the named licence holder to be a person involved in running the station rather than a member of hospital or trust staff.</p> <p>Finding a willing member of staff and explaining what they are signing up for has always been a challenge. This person also has no control or involvement in the station output so is almost signing a blank cheque.</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</p>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p>

services from the need to hold a Broadcasting Act licence?	Although this doesn't affect our station, we support the idea.
Question 7: Do you have any comments on Ofcom's proposed fees for restricted services?	<i>Is this response confidential? – N (delete as appropriate)</i> At a time when stations' budgets are already stretched and fund-raising opportunities are limited, any increase in licence fees is unwelcome.