

## Your response

Question	Your response
<p><b>Question 1: Do you have any comments on Ofcom's proposals to make more frequencies available for restricted services?</b></p>	<p><i>Is this response confidential? – N (delete as appropriate)</i></p> <p>URY has been taking part in Ofcom's Limited Coverage trial since we went live on the first of September 2021 with our FM service initially on a power of 1W ERP, later rising to 2W. Having this access to the FM band has allowed us to bring our service to more listeners on campus due to the wider prevalence of portable FM radios, particularly radio alarm clocks.</p> <p>The coverage has not quite reached the extent we were hoping for, with the steel-framed constructions of many modern university buildings proving to be an impediment for the reception of our signal, especially on the east campus of the University, which is shielded by a natural rise, however, in the area we are reaching the quality of reception is excellent. Due to the natural terrain features, including shielding and the open countryside to the East of the University, we would like to explore more options for higher-powered directional systems to increase our coverage on our East campus.</p> <p>URY and other student radio stations are an ideal fit for this type of licence as the largest part of our listenership is found on the University campus itself, an area of a few square kilometres, that can be served by a lower transmitter power.</p> <p>URY, like many other student stations already has a LPAM licence, with which we have provided a service for many years, but the low audio quality of this service combined with smaller and smaller numbers of AM receivers sold each year has made this a less ideal method of reaching our target audience year-on-year.</p> <p>We believe that the opening up of FM frequencies for more LRS services is a great</p>
	<p>opening for the democratisation of the radio sector, allowing a much lower bar of entry for smaller organisations like hospital, university and other types of campus radio to provide a good service to our listeners without sacrificing quality or accessibility for listeners.</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 broadly support the changes laid out in section 3 of the consultation document and the positive effect they will have for student broadcasting. We particularly feel that the streamlining of the application process will encourage smaller broadcasters like campus stations to commit to licensed broadcasting.</p> <p>Additionally, we feel that the changes to the licence terms make it friendlier to stations that wish to provide broadcasting commitments lying between the 28 days a year maximum for SRSL services and full-time broadcasting. Most student stations are entirely run by student volunteers, and serve only students and staff at Universities. This means they would prefer to only meet programming commitments during term time, keeping a service going without the volunteers or student audience is usually undesirable and considered an impediment by smaller stations wishing to start broadcasting long-term.</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><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>URY has had a broadly positive experience with the new licensing system on FM as part of the trial, and wishes to extend our trial licence to a full time LRSL as soon as possible to keep continuity of service for our listeners.</p> <p>We understand the necessity of clearing current LRSL bands in a timely manner to allow for new</p>

	<p>short term services to utilise the space. However, we would urge Ofcom to establish a period of time before this occurs so that stations that have been in LRSL frequencies such as 87.7FM for many years all have a period of at least a year in order to prepare for changes that may be required to their transmission equipment and branding. Such changes are often a considerable expense for smaller stations that may need to be covered financially over a period of several years. Giving such small stations a warning period of at least a year before they are required to make these changes will significantly ease the financial and organisation burden these changes would put upon them with little notice.</p>
<p><b>Question 5: Do you have any comments on these changes to our application process, as set out in the revised guidance at Annex 4?</b></p>	<p><i>Is this response confidential? N (delete as appropriate)</i></p> <p>We particularly support the changes made in respect to minimum licence terms for services broadcasting to establishments and feel this may support student broadcasters.</p> <p>The changes to eligibility for 'LRSL' licences in more populated areas of the UK will likewise be of great service to University broadcasters in areas with greater population density than York.</p> <p>We would however like to note that the changes to the identification of the licensee fail in our view to fix the issue where the trustees of an applying organisation change frequently, thus necessitating expensive licence amendments. We would prefer a wording change making it clear that changes to an applying organisation's board of trustees would not require an amendment to the terms of the licence where said trustees are not involved in the day to day operation of the broadcast services.</p>
<p><b>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?</b></p>	

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

*Is this response confidential? – N*

As always with fee increases we understand the need for Ofcom to cover the costs they incur as part of their spectrum planning and regulation duties, and broadly accept a need for the fees to increase despite the associated drain on finances this will cause to many already-struggling LRSL operators around the country.

We would ask Ofcom to consider the effect of this price rise on Student Broadcasters. The majority of licensed student stations operate on very small budgets, and are very limited in terms of what fundraising they are able to perform due to their frequently complicated ownership arrangements. With this in mind, we hope Ofcom would be open to negotiation over further price rises.

We do however feel that the strict cutoff at 2W between rate bands is just too low and fails to accurately track the deployment scenarios that may be found in the UK.

URY, in particular, has had issues with our ability to cover both of our University campuses on our current 2W of power ERP, we would like a directional increase in power to cover this, however, the proposed new licensing scheme fails to reflect the differences in assessing the impact of such a directional increase to an isolated small station such as ours, to the impact of a current 25W ERP LPFM in a more built-up area. We would like to see the 2W limit increased to a more reasonable level such as 5W in order to cover this scenario.