

**The Radio People is a broadcast services consultancy that works with commercial and community broadcasters.**

Ofcom is proposing to cease two policies relating to the granting of SRSLs as, in Ofcom's view, these two policies have not achieved the objective of securing a wider range of services and serving a greater variety of tastes and interests, than would otherwise be the case. However, we do not see how abandoning these policies will address this issue.

Whilst more SRSLs may be likely to exist because of these changes, it will inevitably lead to more broadcast content that is similar or the same as content that is already being broadcast by community and commercial radio stations. This will not secure a wider range of services and could adversely impact the finally balanced financial support received by independent commercial and community radio services.

**Question 1: Do you agree that Ofcom should cease to apply the policy to not grant the same applicant more than two SRSLs in a single year, or one SRSL if the service is within the M25?**

We do not agree that Ofcom should abandon this policy.

Whilst this specific change is unlikely to impact negatively on the range and variety of services available to audiences or on any would-be users of spectrum, we do not see any evidence that it will result in a wider range of services.

With the advent of small-scale DAB, we believe that Ofcom should be moving away from analogue (FM) SRSLs in favour of supporting small-scale DAB licensees and promoting the digital platform for pop-up/trial SRSL services. This would be supportive of the sector and streamline the licensing process to bring it into alignment with DSPS licensing. It would also eliminate the requirement for Ofcom's engineering department to commission SRSLs.

We note, in the draft 'Short-term restricted service licences - Guidance notes for applicants and licensees' paragraph 3.5, it states:

*'Ofcom will also consider SRSL applications for 'trial' digital radio services, whether your intention is to launch with a permanent service on an existing digital radio multiplex or a small-scale digital radio multiplex.'*

This paragraph follows on from 3.4 outlining trial analogue (FM) services and seems to indicate that Ofcom will consider SRSL applications to operate standalone band III small-scale DAB multiplex trials. Is this the case?

**Question 2: Do you agree that Ofcom should cease to apply the policy to not grant SRSLs where the service proposed to be provided does not appear to be different from what is available on the commercial and community services in broadcast?**

We do not agree that Ofcom should abandon this policy.

Paragraph 5.2 of Ofcom's guidance notes provides:

*"The programme format of a short-term restricted service should broaden audience choice. You should provide output that is different from what is available on the commercial and community services in the area where you wish to broadcast. We may reject applications that do not appear to be different from a commercial or community radio service in the same area."*

We believe this guidance note provides an important protection for existing 'long-term' radio services where listener tastes and interests are already being served. We believe that abandoning this provision could adversely impact small independent commercial and community radio services.

The two examples offered by Ofcom (2.12 and 2.13) demonstrate how the implementation of this policy has protected existing 'long term' community broadcasters – whose operations may otherwise have been adversely affected during the Islamic holy month of Ramadan.

We note that Ofcom expects the consequence of removing this protection would be that more SRSLs would be likely to broadcast content that is similar to content broadcast by community and commercial radio stations. We are not convinced that allowing SRSLs to provide output that is similar or the same as what is available on the commercial and community services would be good for listeners, existing analogue broadcasters or future small-scale DAB services.

At a time when the analogue FM spectrum is virtually exhausted and the rollout of small-scale DAB is imminent, we believe that Ofcom should undertake a comprehensive review of analogue SRSLs with a view to migrating trial services to the small-scale DAB platform.