


Your response

Question 1: Respondents are invited to comment on whether they agree with Ofcom's preliminary view and to frame their views and responses with reference to, or in the context of, the statutory criteria in section 106(1A) of the Broadcast Act 1990 (as amended).

I fundamentally disagree with the view that the rebranding of XS Manchester wouldn't narrow the range of programming available locally, with regards to the requirements of section 106ZA criteria (b): "that the departure would not narrow the range of programmes available by way of relevant independent radio services to persons living in the area or locality for which the service is licensed to be provided" for the following reasons:

- 1) Radio X (Manchester) is cited as a local station with crossover for programming offered by XS Manchester at paragraph 3.12. This is untrue. Radio X is based in London and, while it can provide some local news on its FM channels, is not a Manchester radio station, run by rock and indie fans in Manchester for Manchester. Radio X is, primarily, a London based radio station.
- 2) Radio X (Manchester) is not an independent radio service, but is part of a multinational broadcast provider Global Radio Group Limited – a company registered in Jersey. Radio X is primarily presented from London with a mostly national focus. This would reduce the range of local programmes available as Radio X does not provide the programming crossover with XS Manchester alluded to in the consultation document.
- 3) Capital XTRA is already available in Manchester via DAB radio. This, by nature, cannot replace the local programming offered by XS Manchester, and can only reduce the programming available as Capital XTRA is already available, and similar to Radio X, will be primarily London based with some local news. XS Manchester and programming offered would completely disappear, while Capital XTRA is already available.

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- 4) The loss of XS Manchester programming would significantly affect the local music scene, where new artists are offered opportunities, and listeners are offered programming where they can experience local artists for the first time. Capital XTRA is a national radio station which would not provide the same level of local opportunities.
 - 5) XS Manchester offers local chat shows for both music and sport, which is not offered by Radio X or Capital XTRA. Radio X offers a national equivalent, but does not focus on local issues.
 - 6) Programming is produced by, and presented by, Manchester based and Manchester focused individuals. Capital XTRA would be another national radio station occasionally paying local lip service. This is not truly a local radio station.

I feel strongly that this consultation paper is looking solely at the rules and not at the principle for which those rules were established - i.e. that local radio should be local, and not presented from a centralised location but meeting the minimum broadcast requirements to be considered a local station.