## **Your response**

Question	Your response
	Confidential? N
	Do you agree that for the purposes of where locally-made programming may come from, Ofcom should approve the 'South of England (Bauer)' area in relation to the 12 local licences listed in Section 2 of this document? If you do not agree, please give reasons.
	No. I do not agree.
	I write from my experience of listening and engaging with Spirit FM, Chichester. The proposal seems to be a business case, rather than in the interests of consumers (albeit I imagine the business case has overly emphasised costs and underestimated the impact on revenue).
	<ol> <li>I only found out about your consultation yesterday (3<sup>rd</sup> June 2020), which was as a direct result of conversations started by a petition to save our local radio station. I do not think Ofcom's consultation principle A2.1 has been satisfied. (The driver for your change in areas in 2018 seems to have been technological changes; there are many more effective ways to engage with people now, but requiring the radio stations affected to broadcast regular announcements would have been a good start. Covid-19 has highlighted how much people are at a disadvantage when they don't have access to the internet. Perhaps the most high profile, and peculiar, recent example is Dominic Cummings, some of whose covid-control behaviour seems to have been justified by details which were apparently online; anyone not online would have had to rely on the Prime Minister's letter we all received.)</li> <li>Spirit FM's broadcasting has a foundation on staff who know our local area in a way that only people who are out and about in a place can understand and communicate about it. (Think of how many people have found out more about their local area by living in it in the last few weeks than they have for the last few years – because we've had to stay close to home and to engage with those around us.)</li> </ol>
	3. Not only do staff clearly reference their personal experiences of living in our patch in their broadcasts, they get out and about and meet people in person (when that was possible). Although we can do some things by Zoom,

- etc, we all now know that's no substitute for being sociable in person. Listeners engage with them because we not only listen to them, we relate to them, and we get the opportunity to meet them, in a way that is not sustainable when local becomes remote. Often these encounters are linked to local fundraising causes.
- 4. And there is always the option for listeners to drop in to our local radio station to record an interview, or donate something useful/kind, for example.
- Local runs through Spirit FM's broadcasting like a resort name in a stick of rock – "locally made" in the context of the proposed "South of England (Bauer) approved area" is a bit like saying Stilton (<a href="https://www.gov.uk/government/publications/protected-food-name-stilton-blue-cheese-pdo">https://www.gov.uk/government/publications/protected-food-name-stilton-blue-cheese-pdo</a>) can be made in Surrey.

I listen to Spirit FM because it is local (way back it used to remind us that we live in "the best part of Sussex"). Lumping it in with a much bigger area and calling it "locally-made" simply distances it from its audience, making it less accessible particularly for the people who need it most. (Has there been any equalities/accessibility audit of Bauer's intentions?)

Please do not approve the "South of England (Bauer) approved area" to include Spirit FM's local licence.

END