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Comments:

Proposal 1: regional stations allowed to share programming to become national stations:

The proposed list of stations allowed to share programming (Figure 12) is severely flawed on several counts:

- 1) Some members of the Galaxy, Heart and XFM networks would be allowed to share programmes, but not others.
- 2) Small-scale specialist music stations in Brighton, Bournemouth, Liverpool and Oxford would not be allowed to join national networks should they struggle to remain viable stand-alone
- 3) Much of London could, in theory, be left with no local radio at all.
- 4) Mainstream stations with strong regional identities (i.e. the Real network) could potentially be lost.

Instead, the criterion for allowing shared programming should be format. Contemporary hit and adult contemporary music stations should be required to retain local/regional programming. Stations of all other formats should be allowed to fully network, subject to sufficient DAB coverage.

An additional criterion should be that at least one local station must remain in each area served by a network (there could be a two station requirement for areas currently served by 4 or more local FM stations).

The requirement for coverage on a national DAB coverage should be loosened to allow near-national coverage on local and regional multiplexes

A requirement to provide regional news and information if regional advertising is carried should be considered.

A limited amount of additional FM spectrum should be made available for these new national stations, both as an incentive and to increase listener choice. This should be limited to spectrum unsuited to or not needed for community radio and could include spectrum freed up by stations failing. Higher power frequencies in Edinburgh (107.0), Glasgow (102.1), North East England (104.9) and Norwich (100.7) could be used. A transmitter serving South and West Yorkshire on 88.0 might be considered. 100 w allocations in cities such as Aberdeen, Brighton, Dundee, Exeter, Plymouth and Torbay, where there is limited choice at present, are further possibilities.

Proposal 2: creation of a new national multiplex from existing regional multiplexes:

The regional multiplex network should certainly be extended to provide national coverage. However, each multiplex should be allowed to carry a mixture of national and regional stations. Conversely, stations should be allowed to build national coverage using a mixture of regional and local multiplexes.

Proposal 3: co-location within a new set of defined areas:

Proposal 4: programme sharing within the newly defined areas:

In addition, small-scale stations should be permitted to expand coverage FM within each of these areas where spectrum is available to increase transmission power and/or add relays without severely impacting on community radio.

Proposal 5: mergers of local multiplexes:

Proposal 6: an enhanced news option for local FM stations:

Proposal 7: AM stations:

Proposal 8: Limited redefinition of contemporary music Formats: