

Question 1: What are your views on the continued relevance of Ofcom's three-year strategic framework for the proposed work programme in 2009/10?:

Ofcom must remain alert to the constantly evolving economic situation.

Advertising funded media is in a fragile state because of the downturn in consumer confidence and Ofcom must be ambitious and progressive in its thinking to help the UK Media Industries through this most challenging period.

Question 2: What are your views on Ofcom's proposed policy work programme and top priority areas for 2009/10?:

In commercial radio, Ofcom has been slow to respond to changing market conditions.

We would like to see regulation and ownership restrictions completely removed. Ownership specific laws to radio are completely irrelevant and all ownership, including cross-media ownership, should be guided by competition law only.

We believe that de-regulation of the current localness rules is a necessity and should be an area of absolute priority. The current rules are dated, inconsistent and cumbersome.

With no new FM stations to be licensed, consideration should be given to the continued relevance and existence of a radio specific team, and whether their roles could be undertaken by other functions within Ofcom.

Ofcom should satisfy itself that the findings of the DRWG working group are consistent with the radio industry and whether all industry viewpoints were adequately considered in the DRWG. The (vast) majority of radio broadcast content is delivered via traditional FM/AM signals. That is because they are more efficient and robust platforms than DAB.

We believe Ofcom should consider closing the DAB platform at a local level, and extending all FM local licences for a further 12 years to allow broadcasters in local markets financial certainty and confidence to invest.

There may be some future in DAB at a national level (and even perhaps London), where demand, population coverage and format diversity may allow a wider range of potential services. At a local level, however, FM delivers more than enough spectrum to cater for most tastes and interest.

For the national radio licences (INR), Ofcom should publish its plans and timelines for re-awarding these by auction, ASAP. The availability of these licences offers a chance for the INR sector to be re-energised and also offers new DAB national services, such as Asian or specialist music services, the possibility to improve their business performance through a national analogue distribution platform.

The current prices paid by all operators of INR's are significantly below market rates because of the extremely slow take up of digital (indeed, slower than all uptake models). The public is consequently not receiving the full value from these licences and a fresh market contest is the best way to establish the market rate for these valuable radio frequencies.

Finally, Ofcom must give us confidence that it remains a value for money regulator. When all industries are looking at operational costs, it should assess whether it is delivering value for the public and for Government.

Question 3: What are your views on the elements which should be contained within Ofcom's new strategic framework?:

The Internet has irrevocably changed the global communications market.

Ofcom's policies must allow traditional media to compete effectively, whilst delivering either social gain or economic value for the public as the cost for any public spectrum that is used in its businesses.