

Graham Hughes

Question	Your response
<p>Question 1: We consider that the launch of the four DAB+ music stations and the extension of broadcast hours for BBC 5 Sports Extra are material changes. If you disagree, please explain why you consider the BBC's published proposals are not material.</p>	<p>Confidential? No Agree</p>
<p>Question 2: Do you consider that the BBC's published proposals are clear in relation to their scale (both in terms of financial resource and in terms of reach and type of content) and the timescales for implementation? If not, please provide details of the areas where you feel more clarity is required.</p>	<p>Confidential? / N The BBC appears to have not fully represented all the costs involved in the planned new services</p>
<p>Question 3: Did the BBC's PIT consultation processes provide suitable opportunity for you to set out your views fully? If not, please provide details.</p>	<p>Confidential? – N It did not. (see notes below)</p>
<p>Question 4: Given that both proposals raise a number of contentious issues, it is our intention to undertake full BCAs for both. If you disagree and think that Ofcom should undertake Shorter Assessments, please explain why.</p>	<p>Confidential? – N Agree</p>
<p>Question 5: Do you agree with the BBC's assessments in its PITs about the potential public value and/or market impact of the proposals? Are there any additional public value and/or competition considerations that have not been identified by the BBC?</p>	<p>Confidential? – No</p> <p>The BBC has a history of "land grabbing". These are an example of the BBC apeing commercial competition but adding additional PSB ingredients.</p> <p>BBC RADIO 2X</p> <ul style="list-style-type: none"> • I fully appreciate the comments made by the management of Boom Radio. As a listener to Boom Rock I would be extremely annoyed if this station was forced from the marketplace by a BBC intervention however well meaning. (Boom Rock justifies being a national DAB+ service). • As a Licence Fee payer I accept that the BBC has treated loyal parts of its radio audiences badly, particularly with Radio 2 chasing a 35 to 50 year old demographic especially on weekdays. That alone justifies a Radio 2X

service for an older musically literate audience and for Licence Fee payers.

- The BBC's destruction of the older generation targeted Local Radio service in England has been disgraceful. The tedious formatting has produced a service lacking in credibility, relevance and passion to succeed in nearly all of the "local" areas it used to loyally and energetically serve. BBC Local Radio has reached an audience low that effectively makes the network, in England, unsustainable as many BBC managers now accept. Sadly no senior manager has a credible public plan to reverse BBC Local Radio's fortunes, and professionalism. (Contrast and compare with Radio Wales and Radio Scotland output). So is BBC R2X a plan to replace the expensive BBC Local Radio network in England? (It would certainly be cheaper and free up much needed funding for Digital First).

COMPROMISE OPTIONS:

1. ***BBC Radio 2X should be given the go ahead, but as a BBC Sounds service only.***

 1. ***Merge a Radio 2X service with the now failing and flailing BBC Local Radio network in England - particularly in evening and other off peak hours including weekends. This would lead to many benefits including upping the ante on professional output, targeting underserved parts of the +55 demographic, and of course for marketing and promoting a saleable dual purpose service.***
- ***Overall the BBC needs to think further than its current proposals if it is to remain relevant in the 2030s.***
 - ***Despite the PIT, does the BBC really need so many broadcast services with the opportunity to use BBC Sounds and IPlayer to an even greater effect, when budgets continue to be tight. (And with a Licence Fee that now has***

	<p><i>over two million households avoiding paying).</i></p> <ul style="list-style-type: none"> • <i>It is very easy to be cynical at this point and claim that ALL these BBC proposals are a land grab to help defend the Licence Fee post 2027.</i> • <i>BBC box ticking days are over - being relevant is now everything.</i>
<p>Question 6: Do these proposals lead to any significant market impact concerns which might affect your own services? If so, please explain how the BBC's proposals would affect your services if they go ahead.</p>	<p>Confidential? – Y / N Not relevant</p>