Consultation Questions & Comments

Name and address of organisation:

transplan UK

6 Horn Street

Compton

NEWBURY RG20 6QS

Transmission and studio systems provider to 38 Community radio Licensees

Question 1- Do you agree that the restriction on community radio, whose coverage areas overlap with commercial radio licence areas with fewer than 150,000 adults in their measured coverage area, should be removed. If you disagree with this statement please substantiate with details from any available source.

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| Response Q.1  Yes – all restrictions on advertising for Community Radio stations should be removed regardless of the presence of other broadcasters because the need for protection of small commercial stations as originally conceived is no longer relevant. |

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| Question 2- If the funding restrictions on advertising were to be reduced  ought the requirement on Ofcom to look at potential economic impact need also to be reviewed. We welcome your views on this. |

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| Response Q.2  No – unless specifically requested by individual stand-alone broadcasters which can prove economic impact. |

Question 3 – Should there be a relaxation of the restriction preventing stations from taking more than 50% of their income from advertising and sponsorship. If your answer to this question is yes, then what should the new restriction be. How should it be determined. For example, set in regulation or set by Ofcom following consultation and reviewing periodically.

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| Response Q.3  Yes – the restriction should be completely removed because it has proved to be impossible to administer and control and as in Question 1 the reason for its introduction is no longer valid. |

Question 4 – Of the two options noted above which do you support, and why. Include reasons why you dismiss the alternative option. We invite you to provide details on other approaches for consideration.

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| Response Q.4  The question is unclear but I have made my views on each of the above questions obvious. |

Question 5 – What way/s could a Fixed Revenue Allowance be fairly determined if this was to be set by Ofcom. Should this be set by Ofcom. What facts would Ofcom need to take into account in setting an appropriate level of allowance.

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| Response Q.5  The concept of a Fixed Revenue Allowance is simply yet another artificial business constraint and is neither fair nor necessary. If introduced it would yet again be bypassed by the clever and become a burden to the remainder.  It should be deleted from the schedule of this Consultation. |

Question 6 - Would you support a further 5 year extension of a licence beyond the second 5 year period. If you do not agree, please provide reasons why this should not happen.

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| Response Q.6  Yes – providing the station is agreed by Ofcom to be performing satisfactorily and no better option has been offered by another Licence Applicant where a competitive situation is advertised. |

Question 7 – How can Community Radio Fund grant funding be better used.

*There are no plans to alter how decisions are taken to distribute the grant however we welcome views on other ways in which the grant could be better targeted and how might this be done.*

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| Response Q.7  There is no point in asking this question if the decision structure is to remain as existing. The important matter here is that the Community radio Fund is ridiculously small for the perceived demand. |

We would welcome other views about the regulation of community areas and for suggestions for streamlining and improving the regulatory framework in which they operate.