

Premier Christian Radio
Glen House
Stag Place
London
SW1E 5AG

25 January 2002

Dear Sir

Further to our correspondence of 22 December 1998 and 12 February 2001 (see copies attached) Premier welcomes this further consultation exercise instituted by your department, and welcomes the Government's commitment to competition and deregulation in the radio industry.

Our previous letters outline Premier's present situation. As we are currently prohibited from entering the digital arena we are glad that the Government has already indicated that it will remove the exclusion of religious groups owning local digital licences.

Over the past eight months many thousands of people in the Christian community have supported our campaign to obtain a digital licence, and a petition containing 130,000 signatures was presented to your department on Tuesday 8 January 2002.

We believe that Premier's participation in commercial radio in London has attracted a significant number of new listeners to the industry. From the strength of feeling indicated from other parts of the UK, we are confident that should Christian radio be available elsewhere this situation would be replicated.

The present exclusion of religious groups from owning national, analogue or digital licences is currently justified by arguing that there is a shortage of frequencies. However, the practical effect of this prohibition merely denies people access to their programme service of choice. As the large number of Christian broadcasters operating on satellite or cable systems indicate, there is clearly a demand for such programming. We are confident that should 'free to air' programme services become available then a significantly greater audience would be drawn to this programming niche. To this end we believe that all discriminatory provisions should be removed.

It is important that the Communications Act anticipates as far as possible changes in delivery mechanisms and technological developments. We would urge therefore that the anticipated changes relating to religious groups owning local digital licences be extended to and be explicitly comprehensive in respect to DRM, DAB, digital short wave and medium wave.

Although Premier supports the lifting of all exclusions relating to religious groups owning broadcasting licences this does not necessarily indicate that we will be participants in any national licence initiatives. We have already indicated to the Radio Authority our strong interest in medium wave licences in major conurbations/ regions of the UK, believing that locally managed and supported Christian stations sharing central resources would be a more effective way to achieve a (near) national Christian presence.

Yours sincerely

Peter Kerridge
Managing Director

22 December 1998

Mr Niall Mackenzie
Room 411
Department for Culture, Media and Sport
2-4 Cockspur Street
London
SW1Y 5DH

Dear Mr Mackenzie

I am writing in response to the consultation exercise that the Department for Culture, Media and Sport has instituted on the possible relaxation to statutory restrictions on participation in bodies corporate in possession of a licence to provide local radio multiplex services.

We are advised by the Radio Authority that the amendments to the Broadcasting Act in 1995/6 did not carry any provision forward for digital broadcast licences which means that Premier Christian Radio cannot hold a digital licence nor is able to be part of a multiplex of digital services. The Broadcasting Act 1990 included the provision for religious bodies to own satellite and local broadcast licences - see Schedule 2 Part II Section 2 (2). Such a licence is owned by Premier. It is clear that there is an anomaly in the Broadcasting Act in relation to the ownership by religious bodies of digital sound programme licences.

I understand that the purpose of any amendment to statutory restrictions would be to encourage and facilitate investment in digital radio. Premier would welcome this opportunity to enter this new media market.

Whilst in practice there will only be one national commercial multiplex until more spectrum is available for digital radio Premier would also appreciate the opportunity to enter this market in due course. Industry colleagues have indicated that they would support our involvement and the current statutory provision may well be considered to have an unintended effect on the introduction of commercial digital radio in the U.K.

Premier, as an existing participant in commercial radio, is significantly disincentivised from investing in digital initiatives and obviously is constrained in forming partnerships across the industry to that end. As things currently stand Premier will inevitably find itself outside any consortium initiative. This was obviously not the intention of the legislation which was designed to promote plurality of ownership (and, thereby, diversity of content.)

Premier is operating in one of the most competitive markets in the World and is currently disadvantaged in terms of growth opportunities. The current restrictions would need to be relaxed in order to enable it to participate in different consortia for different licence applications around the country. This would also allow us to make meaningful investments in local multiplexes.

Premier is supported by all of the mainline Christian denominations and has many distinguished patrons including :

Cardinal Basil Hume
Baroness Caroline Cox
The Rt. Hon. Simon Hughes M.P.
Professor Lord McColl

We believe that our record as an independent station combined with our good standing with the Radio Authority add weight to the comments made above.

Yours sincerely

Peter Kerridge
Managiing Director

12 February 2001

Communications White Paper Consultation
c/o C11
DTI
151 Buckingham Palace Road
London
SW1W 9SS

Dear Sir

I am writing further to your invitation to make representations regarding the Communications White Paper.

Having developed a significant audience over the past five years and having enjoyed the full support of all of the major Church groupings, we are encouraged by the Government's intention to lift the restriction regarding religious broadcasters and local digital licenses. We also believe that this positive development should be extended to include national digital licenses. It is our view, based on significant experience, that should this restriction also be lifted the advantages of such a decision would be substantially greater than the fears expressed in the White Paper.

Yours sincerely

Peter Kerridge
Managing Director