



Illegal Broadcasting

Understanding the issues

Publication date:

19 April 2007

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Section 1

Executive summary

- 1.1 Ofcom and its predecessor regulators have been acutely aware of the problems caused by illegal radio broadcasters (or 'pirate radio') for many years, and have been actively engaged in taking such broadcasters off the air throughout that time. However, Ofcom recognises that such enforcement actions by themselves will not provide a total solution to the issues involved. We therefore want to take a fresh look at the issues and consider alternative ways of tackling them.
- 1.2 This report outlines those issues and undertakes, for the first time, detailed research into the extent of listening to illegal stations and the reasons why people listen to them. It will be followed-up by further work later this year which will consider a wide range of options (beyond enforcement) for tackling this issue. This work is separate from, but closely aligned with, the work currently underway on the wider issues faced by the UK radio industry, as set out in Ofcom's 'Future of Radio' consultation, published earlier this month. We will ensure that any conclusions and recommendations that arise from our work on illegal broadcasting will be consistent with our conclusions and recommendations on the wider future of radio.
- 1.3 It is important to stress that Ofcom will not be able to tackle the problem of illegal broadcasting alone, as any alternative strategies will require the support and assistance of other public and industry bodies.
- 1.4 We estimate that there are currently around 150 illegal radio stations in the UK. At any one time, it is believed that around half of these are transmitting in London, within the M25 area.
- 1.5 Illegal broadcasters cause interference to safety-of-life radio networks, such as those used by air traffic control and the fire service, and are often associated with wider crime and nuisance. They also cause substantial interference to the signals of licensed broadcasters, leading to frustration for listeners (who may be unable to listen to their station of choice) and lost revenues for the affected stations. New Ofcom research suggests that 30% of all listeners suffer interference on FM, which they believe may be caused by other broadcasters or stations. Of those who suffer interference, 14% believe it is caused by illegal broadcasters. In London, these figures rise to 40% and 27% respectively. 64% of listeners affected say they switch to a different station or turn the radio off, while only 2% say they have made a complaint about interference. This figure increases to 8% when listeners believe the interference is caused by illegal broadcasters.
- 1.6 Ofcom employs a field force to investigate, and take off-air, illegal broadcasters. In 2006, we undertook 1,085 separate operations against illegal broadcasters, resulting in 63 convictions. Investigations are prompted mainly by information received from listeners, licensed radio stations or public services. Ofcom's enforcement activities are guided by specific duties that we have under legislation, which makes it clear what we need to do to fulfil those duties.
- 1.7 The first phase of research conducted for this project showed that 16% of adults in Greater London say they listen to illegal broadcasters, with unique music content being the main driver for listening.

- 1.8 In more detailed research conducted in the London boroughs of Hackney, Haringey and Lambeth, where listening to illegal stations is even higher than the London average, the perception of both listeners and broadcasters involved in illegal broadcasting is that existing licensed broadcasters are failing to cater sufficiently for the needs of the certain sections of the public. Apart from the music they play, listeners tune into illegal stations because they perceive them to be good at serving their community.
- 1.9 Despite the advent of new radio platforms such as DAB and the internet, the research suggests that illegal broadcasting audiences are unlikely to diminish in the short or medium term.

Section 2

Context and background

Introduction

2.1 Illegal broadcasting, often referred to as ‘pirate radio’, has been a controversial issue in the UK for many years. This report aims to set out the concerns surrounding illegal broadcasting, and provides details of some independent audience research commissioned by Ofcom to assess the extent of listening to illegal stations and the reasons why people listen to them. This is not a consultation, but if you have any views regarding the issues raised in this document, details of who to send them to are given in Section 7.

Illegal Broadcasting – Ofcom’s statutory role

2.2 Ofcom has a number of statutory duties that relate specifically to the electromagnetic spectrum. The Communications Act 2003 gives Ofcom a general duty to secure the optimal use of the spectrum, and also requires Ofcom when carrying out its spectrum functions to have regard (amongst other things) to the desirability of preventing crime and disorder, promoting the efficient use of the spectrum, the economic benefits and the development of innovative services.

2.3 Under the Wireless Telegraphy Act 2006, Ofcom issues licences to radio broadcasters for the use of stations and apparatus for wireless telegraphy. The Act sets out a number of criminal offences relating to wireless telegraphy. The offences include:

- 2.3.1 establishing or using a wireless telegraphy station or apparatus for the purpose of making a broadcast except in accordance with a wireless telegraphy licence;
- 2.3.2 keeping a wireless telegraphy station or apparatus available for unauthorised use;
- 2.3.3 allowing premises to be used for unlawful broadcasting;
- 2.3.4 facilitating unlawful broadcasting by, for example:
 - participating in the financing or day-to-day running of an unlawful station;
 - maintaining or repairing equipment used by an unlawful station;
 - supplying a film or sound recording to an unlawful station;
 - participating as an announcer for an unlawful station;
 - advertising by means of an unlawful station; and
 - using apparatus for the purpose of interfering with wireless telegraphy (i.e. deliberate interference).

- 2.4 Under the Wireless Telegraphy Act 2006 Ofcom has powers that it can use to take action against those who commit these offences, including powers of entry, search, and seizure of equipment. It is a criminal offence to obstruct a person exercising enforcement powers on Ofcom's behalf.
- 2.5 In addition, under the Broadcasting Act 1990, anyone convicted of an unlawful broadcasting offence is disqualified from holding a broadcasting licence for five years. Operators of legitimate stations are required by the terms of their broadcasting licences to do all they can to ensure that persons thus disqualified from holding a broadcasting licence are not concerned in the provision of a legitimate service or the making of programmes for it, or in operating a wireless telegraphy station for broadcasting a legitimate service.
- 2.6 Other legislation gives Ofcom and police officers the power to seize and detain equipment used for illegal broadcasting under the authority of a search warrant (Wireless Telegraphy Act 2006); investigation powers, such as access to certain data about telephone, email and internet communications used by illegal broadcasters and to undertake covert surveillance (Regulation of Investigatory Powers Act 2000).

A brief history of illegal broadcasting in the UK

- 2.7 Although there were a few isolated incidents of illegal broadcasting in previous decades, 'pirate' radio in the UK first became a widespread phenomenon in the early 1960s with the emergence of a number of pop music stations, such as Radio Caroline and Radio London, broadcasting on Medium Wave to the UK from offshore ships or disused sea forts. These stations were set up by entrepreneurs and enthusiasts to meet the growing demand for pop and rock music, which was not being adequately catered for by the legal BBC radio services. At the time, these stations were not technically illegal because they were broadcasting from international waters. However, the Government closed this loophole via the Marine Offences Act of 1967, which eventually led to most of the offshore pirate stations ceasing their activities. Meanwhile, in 1967 the BBC set up its own dedicated pop music service, Radio 1, which featured a number of former 'pirate' DJs and, a few years later in 1973, commercial radio ('Independent Local Radio') launched, licensed by the Independent Broadcasting Authority (IBA) to provide further choice for listeners.
- 2.8 The late 1970s and early 1980s saw a new generation of land-based illegal broadcasters emerge, broadcasting mostly (but not exclusively) in the big cities. These included community-focused local stations such as Sunshine Radio in Shropshire and Radio Jackie in south west London, but also – for the first time in the UK – stations focusing on particular music genres such as, in London, Kiss (dance), Solar (soul) and Alice's Restaurant (rock).
- 2.9 In 1990, the Radio Authority took over responsibility for radio regulation from the IBA and embarked on a major new licensing programme. While not necessarily undertaken specifically to reduce the amount of illegal broadcasting activity, the new wave of licensing was nevertheless designed to provide a greater diversity of commercial radio services for listeners in each area. Previously, under the IBA, there had been only one local commercial radio service per licensed area, with the exception of London which had both a music and speech station.
- 2.10 The new stations licensed by the Radio Authority in the 1990s included a number of services which had grown out of, or had associations with, previously illegal operators, such as Kiss FM in London, FTP in Bristol, WNK Radio in Haringey,

London and KFM in Stockport. Of the stations from this era that are still on the air, only a few (such as Sunrise Radio in London) remain in the hands of the original owners, with most having become significantly more mainstream and broadly-targeted as a result of commercial pressure to achieve not only greater audience numbers, but in some cases, to deliver particular types of audiences sought-after by advertisers. These target audiences may sometimes have been different to those which the original stations had initially set out to serve.

The current illegal broadcasting scene

- 2.11 Ofcom estimates that there are currently around 150 illegal broadcasters in the UK. A large proportion of these are operating in London, with notable clusters in Harlesden, Stoke Newington, Southwark and Lambeth.
- 2.12 There is a popular misconception that the people behind illegal radio stations are just enthusiasts with an interest in music and/or broadcasting; in fact, many illegal stations turn over large sums of money. Set-up costs are minimal: a transmitter costs around £350 and a good-quality studio can be assembled for £2,000.
- 2.13 Revenues obtained by illegal broadcasters usually come from two sources:
 - 2.13.1 Illegal radio stations receive income from selling on-air advertising, most commonly publicising events at nightclubs. A large illegal radio station can generate up to £5,000 per week in cash in this way.
 - 2.13.2 Many DJs pay to broadcast on illegal radio stations in an attempt to gain public exposure. Predominantly young DJs are often exploited by station managers, who will charge them up to £20 per hour for the chance to appear on the air.

Looking forward

- 2.14 As Ofcom's Future of Radio consultation document¹ sets out, radio – like most other forms of electronic media – is moving firmly towards a digital future, and while there are no current plans to switch off services broadcasting on FM, the consultation document argues for the flexibility to use this spectrum for other things when the time is right (those other things may include a different range of FM radio services).
- 2.15 If digital radio across a number of platforms (including DAB, digital TV, the internet and other technologies such as DRM) becomes the way the majority of listeners hear radio in the future, it is likely that illegal broadcasting activity would be substantially reduced. This is partly because it is considerably more difficult for a single illegal radio service to broadcast on DAB than it is on FM, due to the multiplexing involved in DAB transmission, and partly because such services may be offered via the internet, which does not require spectrum.
- 2.16 However, the determination of illegal broadcasters to be on whichever platform dominates listening should not be underestimated, and it is notable that there has already been some unlicensed broadcasting activity on the DRM (Digital Radio Mondiale) platform in Germany, for example. DRM provides close to FM quality on the Short, Medium and Long Wave bands, which in future could make these bands more attractive to unlicensed broadcasters. Thus it is not necessarily the case that a

¹ The Future of Radio, published April 2007, available at www.ofcom.org.uk/consult

transition to these types of digital platform would signal the end of illegal broadcasting in the UK.

Section 3

Why is illegal broadcasting an issue?

Safety-of-life concerns

- 3.1 Illegal broadcasters cause interference to safety-of-life radio systems, such as those used by air traffic control and the fire service. Because illegal broadcasters use unauthorised frequencies at transmitted powers which have not been cleared internationally, and because their transmitter equipment may not comply with the appropriate technical standards, their signals may interfere with services using adjacent frequencies or those frequencies which have a technical relationship to the ones being used by the illegal broadcaster. This will not necessarily be apparent to the illegal broadcaster, or to those listening to their service, but may completely wipe out coverage of legitimate radio services used by public authorities.
- 3.2 In 2005 Ofcom's field operations team responded to 41 safety-of-life cases. In such instances, it is normal for Ofcom's enforcement team to seize the main transmission equipment as a 'quick-fix' to the serious interference issue.
- 3.3 An example of this kind of incident occurred on 14 July 2005. Following contact from the Civil Aviation Authority (CAA), the Ofcom investigation team were deployed to east London to investigate serious interference to the ground-to-air communications system in use at London City Airport. The source was traced to an illegal radio station called Passion FM in the Hackney area. The offending transmitter was subsequently removed by Ofcom staff. This was one of the most serious cases of interference for many years, as London City Airport was close to being shut down because it had no alternative means of reliable communications.

Impact on licensed broadcasters

- 3.4 Illegal broadcasters can interfere with legitimate, licensed broadcasts from commercial, community or BBC radio stations. In fact, illegal broadcasters with more powerful transmitters can sometimes entirely obscure signals from smaller (legal) radio stations with lower transmitter power. For commercial stations, this can result in a loss of measured audience which, in turn, can lead to falls in advertising revenue. Potentially, this can put the whole economic viability of the station – including the jobs of the staff it employs – into jeopardy.
- 3.5 Illegal stations can also be in competition for local advertising revenue from legitimate stations. Because the illegal broadcasters have hardly any overheads, they can undercut the advertising rates of the legal stations, making it harder for the licensed stations to compete.
- 3.6 As well as this technical interference and unfair competition, legal broadcasters also justifiably complain that illegal broadcasters break the law by deliberately avoiding many of the costs that legal stations have to pay, such as taxes, rent, licence fees and music copyright fees.
- 3.7 These problems, and particularly those related to interference, are likely to get worse as more community radio stations – which Ofcom has been licensing over the past three years – start to come on the air. This is because community radio stations are required to transmit at much lower power than their commercial radio counterparts (therefore making them particularly vulnerable to interference), and are also likely to

be more dependent than mainstream commercial stations upon revenues derived from very localised advertising.

Interference for listeners

- 3.8 Aside from the commercial impact upon commercial radio services described above, listeners find it extremely frustrating if their listening to the radio station of their choice is affected by interference from an illegal broadcaster transmitting on the same, or nearby, FM frequency. This interference can range from a slight audible distortion to the signal of the legitimate station through to the signal being completely wiped out by the illegal broadcaster. In new research into listener perceptions of radio interference (reported fully in Annex 3 to this report), 30% of UK listeners say they suffer from interference, with 14% of those attributing this to illegal broadcasters. In London, those figures rise to 40% and 27%, respectively.
- 3.9 The research shows that some 41% of listeners in the UK who suffer interference problems will switch to another station when the interference occurs, and 23% will turn the radio off altogether. As discussed above, it is the smallest commercial and community stations, which have the lowest transmitter powers, that are the most vulnerable to interference from illegal broadcasters.
- 3.10 The research also shows that very few listeners ever complain about radio interference, with only 2% of listeners who say they experience interference saying that they have made a complaint about it.

Wider crime and nuisance

- 3.11 In addition to the interference-related problems caused by illegal broadcasting previously described, illegal broadcasters cause other types of problems. For example:
- 3.11.1 In tower blocks, illegal broadcasters have in the past threatened and assaulted neighbours and local authority staff in order to obtain access to roof-tops for transmitter sites, or access to flats for studio locations. Furthermore, to power their transmitter, the illegal broadcaster will often tap into the building's electricity supply, sometimes by diverting electricity from the lift motor room and in the process putting the lift out of action for the residents.
- 3.11.2 Raids on the studios of illegal broadcasters have sometimes uncovered weapons, including firearms. Illegal broadcasting also fuels theft; legitimate broadcasters and transmission companies have frequently been targeted by thieves seeking high-quality equipment such as transmitters, encoders and audio processors.

Section 4

Ofcom's current enforcement approach

- 4.1 Ofcom's 70 field officers investigate and take illegal broadcasters off the air. In 2006, Ofcom undertook 1,085 separate operations against illegal broadcasters. This included seizing transmitters, disconnecting transmitters and aerials, and raids on illegal broadcasters' studios.
- 4.2 Investigations are prompted mainly by information received from listeners, licensed radio stations or public services. This approach means that if an illegal service is operating without causing any apparent nuisance, it is less likely to be the target of enforcement action.
- 4.3 Ofcom's enforcement activity depends on the nature of the complaint. If a complaint is received concerning advertising on an illegal service resulting in a loss of revenue for a licensed service, then enforcement activity will target the advertisers on the illegal service, alongside action against the illegal broadcaster itself. In addition to the above, work is structured to target owners of premises, advertisers, nightclub events and suppliers of equipment or other services to the illegal station.
- 4.4 Ofcom removes the transmitter being used by an illegal broadcaster. If a service is able to go back on the air (even within a matter of hours) any subsequent action will be in response to further complaints. Studio raids are normally the result of high levels of complaints of interference and specific information received/acquired by the investigation team.
- 4.5 The success of Ofcom's enforcement activities are measured by a combination of complaints logged and responded to, and the Spectrum Pollution Index (SPI). The latter performance measure is provided by a network of receiver stations which monitor the FM band for channel occupancy. The fewer the number of active illegal broadcasters, the lower the SPI figure will be for a particular area.
- 4.6 Ofcom uses specialist solicitors and barristers to secure convictions against illegal broadcasters, with a 100% successful conviction rate. Almost all prosecution cases have resulted in a court appearance for the offenders. In 2006, some 63 people were convicted.
- 4.7 In 2005, Ofcom carried out two major operations against illegal broadcasters: in London, Operation Crystal; and in Birmingham, Operation Clavichord:
 - 4.7.1 **Operation Crystal – London**
 - The operation took place during the last week of October 2005
 - It involved 18 Ofcom field operation staff working with 32 Metropolitan Police officers
 - 53 illegal broadcaster transmitters were seized, and 17 transmitters and aerials were disabled
 - 43 mobile and landline telephone numbers linked to illegal broadcasting operations were gathered for further investigation
 - The operation led to a 57% drop in the number of broadcasts in London during the week.

4.7.2 Operation Clavichord – Birmingham

- The operation ran between 30 November and 1 December 2005
- It involved 12 Ofcom field operation staff working with seven West Midlands Police officers
- Three people were arrested
- 10 illegal broadcaster transmitters were removed
- Six studios were raided and equipment seized

4.8 The chart below details the number of operations against illegal broadcasters, and the average fines imposed by the courts:

Table 1: Number of operations against illegal broadcasters, and the average fines imposed by the courts

Year	Stations	Total Ops	Convictions	Avg. fines	Avg. costs
2000	231	1491	41	£377	£302
2001	248	1438	20	£397	£761
2002	209	1046	49	£417	£296
2003	175	877	71	£556	£492
2004	171	1021	52	£333	£1059
2005	177	770	58	£563	£452
2006	226	1085	63	£118	£327

4.9 In recent years, illegal broadcasters have employed more elaborate methods of securing transmission apparatus, in an attempt to counter Ofcom enforcement action. Field officers face a number of dangerous obstacles, including:

- 4.9.1 transmitters placed down ventilation flues, or in chimneys on a roof-top, then restricting access to the device through the use of scissor-type car jacks;
- 4.9.2 attaching 'live' 240 volt electric cables to the access doors on roof-tops, in an attempt to cause shock or injury; and
- 4.9.3 using scaffold poles to jam main access doors on roof-tops.

4.10 These obstacles also make the enforcement process more time-consuming and costly.

4.11 While there has been a rise in the amount awarded to Ofcom to cover the cost of the investigation in recent years, the courts are relatively unsuccessful in collecting the costs on our behalf. Ofcom currently has £56,000 worth of court debtors relating to illegal broadcasting; some of the outstanding debt relates to prosecution cases concluded many years ago.

Working in partnership with stakeholders

4.12 Ofcom's field force works closely with other stakeholders when conducting its investigations into illegal broadcasters.

The police

- 4.13 Due to the potential threat of violence from illegal broadcasters, Ofcom's field officers seek support from local police officers while conducting work in the field. This ensures that Ofcom colleagues have up-to-date information about any known personnel at a site, and support is at hand if there is a breach of the peace during the enforcement activity. Where illegal broadcasters are found on site, they are arrested and taken to the local police station for interview. In the majority of cases, this results in the broadcaster being summoned to court to face charges regarding their criminal activities.

Local authorities

- 4.14 Ofcom colleagues work closely with the local authorities in various different parts of the UK. This close relationship enables us to:
- 4.14.1 inform the local authority of illegal activities taking place on their sites;
 - 4.14.2 develop working practices in handling the illegal activity; and
 - 4.14.3 share risk assessments to protect our colleagues and the general public from harm.
- 4.15 Illegal broadcasters can cause significant damage to roof-tops when installing apparatus, and some have been known to intimidate the caretakers and their families in an attempt to gain access to high-rise blocks.

Mobile phone operators

- 4.16 Ofcom engages in regular discussions with the UK's mobile phone operators. Due to their height, the main transmission masts used by these companies are sometimes targeted as a location for illegal broadcasters' transmitters. In attempt to protect their transmitters, the illegal broadcasters sometimes change locks on perimeter fencing and electrical cabinets, attach barbed wire to structures around their equipment, and, in some instances, detach the main access ladders.

Section 5

Research undertaken into listening to illegal broadcasters

5.1 Last year, Ofcom commissioned two independent research agencies to conduct quantitative and qualitative research into illegal broadcasting. It was designed to gain insight into the extent of listening to illegal broadcast services, and to look at people's reasons for listening to illegal services. The research, which was carried out in two phases, also examined the perceived needs that such services fulfil for their listeners, compared to licensed radio services.

Phase 1 Research

5.2 The first phase of research, conducted by BMRB, took place in June, July and August 2006, and consisted of 1,056 'face-to-face' interviews with respondents across Greater London (which was chosen for the research because of the high number of illegal stations operating in the capital).

5.3 The key findings of this research were as follows:

- 16% of adults said they listen to illegal broadcasts – 6% referred specifically to a named illegal broadcaster;
- When prompted, six in 10 Londoners said they were concerned about interference to the emergency services caused by illegal broadcasters, with the significant remainder not expressing concern. Among those who listen to licensed broadcasters, the proportion who said they were concerned drops to less than half;
- Listeners to illegal broadcasters are made up of all age and social groups, with 15-24-year-olds and those in the C1/C2 socio-economic groups most likely to listen;
- Unique music content appears to be the main reason for listening to illegal broadcasters.

5.4 The full report on this research is shown in Annex 1.

Phase 2 Research

5.5 Ofcom is aware that illegal broadcasting is particularly concentrated in certain areas of London, and undertook further research in those specific areas to gain greater in-depth insights into listening habits.

5.6 The second phase of research, conducted by Essential Research, took place in November 2006, and consisted of 1,817 'face-to-face' interviews with respondents living in the London boroughs of Hackney, Haringey and Lambeth; three in-depth interviews conducted in-home with accompanied radio listening; five in-depth

interviews with industry experts; and 12 focus groups with groups of friends who listen to illegal broadcasters.

- 5.7 The key findings of this research were:
- 5.7.1 Illegal radio broadcasting currently attracts significant audiences across all three London boroughs investigated as part of this research, with an aggregated reach of 24% across all adults aged 14+ living within Hackney, Haringey and Lambeth;
 - 5.7.2 While the reach of illegal broadcasting rises to 27% among males, 30% among those in Lambeth, 37% among students aged 14-24, and 41% among black audiences, the overall demographic profile of its listener base reveals it has much broader appeal;
 - 5.7.3 Among all those who listen to illegal broadcasters within the three boroughs, legal stations Choice FM and Kiss 100 have the greatest reach of any radio station, highlighting the appeal of urban music to this audience;
 - 5.7.4 The thrill of rebelling against the establishment is not, in itself, a major driver of listening to or, indeed, broadcasting illegal radio;
 - 5.7.5 Illegal radio listening and broadcasting is being driven by the importance of radio as a medium for: (1) the development and promotion of grass-roots talent, (2) the urban music scene, and (3) minority community groups;
 - 5.7.6 The perception of both listeners and broadcasters involved in illegal broadcasting is that the licensed broadcasters are failing to cater sufficiently for the needs of the public at large;
 - 5.7.7 There is also a strong audience perception that consolidation within the licensed commercial radio industry has led to a greater divide between the values and output of ‘commercial stations’ versus ‘pirate stations’;
 - 5.7.8 Illegal radio is regarded by many as the best place to hear new music, and the best place to hear urban music, DJ’ing and MC’ing in general;
 - 5.7.9 Illegal stations are also appreciated for their ‘super-local’ relevance, which often takes the form of information and advertisements about local community events, businesses and club nights;
 - 5.7.10 Among those who listen to illegal radio, there is little concern about the disruption that might be caused to emergency services or licensed broadcasters. However, this does become more of an issue for audiences aged 45+. Many listeners take the view that such claims are propaganda disseminated by the authorities in a bid to control media ownership; and
 - 5.7.11 The research suggests that illegal broadcasting audiences are unlikely to diminish in the short or medium term, because:
 - there is little reason to believe that the three key drivers of illegal radio listening and broadcasting (described in paragraph 5.7.5) will become any less relevant in London;

- new media and technology would seem to compliment, rather than replace, illegal FM broadcasting; and
- those who currently listen to illegal broadcasts express little desire to acquire a DAB radio receiver.

5.8 A full version of Essential Research's report is shown in Annex 2.

Section 6

Next steps

- 6.1 We will undertake further work over the coming months to consider a wide range of options (including, but not limited to, enforcement) for tackling the issues raised by illegal broadcasting, and we look forward to working with stakeholders to develop ideas. In particular, our work will consider possible spectrum and licensing options.
- 6.2 We aim to publish a public consultation on these issues later in 2007.

Section 7

Commenting on this report

- 7.1 This is not a consultation, but if you have any views on the issues raised in this report, they should be sent to:

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