



**RESPONSE TO OFCOM'S INTERIM CONSULTATION  
REGARDING  
LICENSING COMMUNITY RADIO**

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### 1 Introduction

This document summarises Estuary Media Limited’s response to Ofcom’s proposals regarding the licensing of community radio.

We have considered the proposals from the perspective of a prospective new small-scale radio station operator and therefore limit our comments to those matters which would directly impact smaller commercial stations – and thus confined our responses only to those specific points raised in the consultation document.

This shouldn’t imply that we don’t believe commercial small-scale and community stations can’t co-exist, nor that we believe community radio doesn’t serve a valuable and distinctive role in the radio landscape.

### 2 Specific Response to Consultation Questions

#### Q2 Spectrum Allocation

We are pleased that Ofcom might consider utilisation of any available space in the FM sub-bands in areas where there is demand for community services, e.g. 88.1 - 94.6 MHz and 99.9 – 101.9 MHz.

Within its current remit, we would like to see Ofcom more broadly represent the interests of the commercial radio sector with regard to spectrum allocation for the BBC, for example by examining the on-going necessity for overlapping transmitter coverage, particularly in the light of technical improvements in receiver design.

#### Q4 Consultation with Commercial Radio Operators

We believe it is essential that existing and prospective commercial radio operators (who have made known their intent to apply for any licence advertised in their area) are consulted as part of community station licence planning. This is especially important in view of the impact on their business interests and consequent impact on the quality of service they are or would be committed to providing.

We would like Ofcom to consider the potential that commercial operators could offer for achieving similar objectives to those proposed by community services, e.g. for fostering social gain, and whether these could be equally or even more effective.

Recognising the service outputs which could be offered by a commercial operator doesn't preclude the opportunity for a community station to co-exist, especially if its objectives differ (e.g. providing a training opportunity), albeit these objectives might be suitably achieved via a long-term RSL.

**Q5 Limit to Advertising Funding**

Community stations undoubtedly need opportunities to finance their operations through a variety of means. The distinction between community and small-scale commercial stations might therefore most usefully be defined not in terms of funding structures but by whether any profit is generated for private investors or totally reinvested to achieve the station's social gain objectives.

**Q7 Prioritisation of Applications**

Please see our comments above regarding the potential for commercial operators being able to achieve community station objectives. Integrating community licence and commercial licence planning, and recognising prospective commercial operator interests as part of this process are important.

We believe there may be a stronger case for earlier advertising of community licences in areas where a commercial station is unlikely to be viable (e.g. a small rural community) or where existing services cover a broader area (such as a borough within a large metropolitan area).

**Q11 Researching the Impact of Community Radio**

Consultation with local political bodies and community associations, other interest groups and individuals are all useful. Data gathered should include repeated anecdotal statements as well as more formalised kinds of research. Local business associations might also be consulted to determine whether they believe there is potential for a commercial operator in the area.

Ofcom might consider the value of using focus groups associated with RSL trials, conducted by prospective community stations, as a means for gathering representative views on the station's potential benefits.