

Dear Soo

Thank you for the opportunity to comment on the proposals for licensing Community Radio. I wish to comment on behalf of Radio North Angus, as follows:

Possible effect on Commercial Radio - We would ask that special consideration be taken of the effects on the viability of small commercial radio stations operated on a not-for-profit basis, if/when applications for community radio licences are received from within, or adjacent to, their areas. Such small stations are the commercial radio stations most likely to be affected adversely by a community radio commencing in proximity, not only in financial terms, but also over availability of volunteers. For instance, small voluntary commercial stations may operate with a large number of presenters in order to sustain a high level of daytime programming, and as such draw upon a wider area than their transmission fields to maintain staffing. A community radio in proximity may thus create competition between the commercial and community radio for staff, which would be contrary to the spirit of the introduction of community radio, and lead to a reduction in the output of the small commercial radio. It may be that in the above scenario, OFCOM may wish to regard the small commercial radio as a community radio for assessment of application purposes.

With reference to income, it would appear that a limit of 50% from advertising/ sponsorship is reasonable. However, again in the case of small commercial radio stations operating on a not-for-profit basis, it may be found that a community radio in close proximity could affect the income of such stations adversely, despite the limitation. Whilst serving their own small areas, such commercial radio stations could have attracted advertisers from adjacent areas, who were interested in out-of-area advertising. We would ask OFCOM to proceed with caution over unintentionally creating advertising competition between small voluntary commercial radio and community radio.

With regard to the application criteria, OFCOM may wish to relax the current restrictions on small not-for-profit commercial stations being barred from applying for community radio licences. Whilst this is obviously enforced to protect community radio from larger profit-making commercial radio, we feel that exceptions should be made for non-profit stations, who would operate the community radio in the spirit intended.

An alternative would be to allow the small commercial radio to expand to cover a locality or town from which there was little likelihood of a community radio licence application being received. This would allow for the indigenous population to benefit from an established non-profit station already possessing the expertise to satisfy the criteria for community radio.

We hope that you will find these comments helpful.

Kind regards

Malcolm J B Finlayson
Managing Director

Radio North Angus Ltd