

The Radio Foundation is a group established to make a proposal to Ofcom for a community radio licence for the city of Chichester.

The group establishing The Radio Foundation has formulated a set of principles to guide its own forthcoming proposals and it may be that, as part of the consultation process, we can usefully share our thinking on what we believe makes for a true community radio station.

For ease of consideration reading we have constructed this letter in three sections –

1. General Observations,
2. Specific responses to the questions as set out in the Ofcom Annex 3
3. Other Observations

General observations

Within the current structure of broadcasting in the UK, the advent of community radio gives a real opportunity for listeners to experience a different style of radio service – with the accent very strongly on serving the local community. The one very clear fact is that community radio stations can and will sound very different to existing local radio stations.

The opportunity, to provide a quality radio service where local information, discussion, reaction and contact are fundamental, should not be missed. At almost any point in the UK there are now likely to be many radio stations on the FM band alone. Despite their perceived localness, many ILR stations have to bow to commercial pressures to appease their shareholders, seeking to increase advertising revenue and to minimise costs with further automation and syndication and even those who wish to do so cannot satisfy the demand for more speech content.

Local BBC stations are often not that local. They are more accurately regional stations which, especially at evenings and weekends, are often syndicated across huge sweeps of the country. Community radio can offer true localness in its content, featuring a much higher speech to music ratio than commercial radio, together with a broader approach to music policy by encouraging local input into programming featuring music genres often perceived to be less popular but which often have strong niche audiences. Local community radio stations may well prove to be closer to Reithian standards of broadcasting than has been evident for many years, with a brief to inform, to educate and to entertain in more or less equal proportions.

Fundamentally, any prospective licensee must be able to demonstrate their understanding of and closeness to their community and its support. This may be done in many ways, by advertising their intentions widely; by seeking letters of support from groups operating locally or by public meetings or a combination of all of these means. It is unlikely to be by commissioning research which is very expensive and would take up a very large proportion of the start up budget of any station.

Responses to Annex 3

Q1. Yes, it is your job and it is encouraging that your approach has been one of consultation. Ofcom should be the regulator of all radio broadcasting issues in the UK and as such needs to identify strong practitioners in the field of community radio and utilise their skills, experience and knowledge to ensure that community radio is a success

Q2. While FM would seem much more desirable for any community radio station, this may put the station in direct competition with local ILR stations which will be on the same band and possibly in very close frequency proximity. AM is, locally at least, rather less cluttered but poses its own technical problems and is probably less desirable.

Audience size is also very important. Our feeling is that an area containing a total possible audience of less than 50,000 may not be economically viable.

Q3 Yes. We would encourage feedback to unsuccessful applicants as to the reasons for non-selection and improvements that they could make in future applications. It should be noted that, as not-for-profit organisations, many groups will have little experience in applying for radio licences but may have a great deal of enthusiasm together with strong contacts that, if correctly guided, could develop a strong quality local radio service.

Q4. Yes but it should be clear that ILR - and BBC local/regional - stations have a right of consultation but not a right to veto community radio station applications. Similarly, submissions from ILR or BBC local radio providers should equally be in the public domain. It is our opinion that, by offering a truly different service, community radio can operate alongside and co-operate with existing radio broadcasting providers.

Q5. A blanket policy in this area is unlikely to be workable and would be difficult and expensive to police satisfactorily. A case-by-case basis would be better for all concerned and could be written into the promises document. To illustrate this point, it is our intention to use advertising solely for our not-for-profit, charity and public service partners, raising income only from programme sponsorship and our other radio ventures. Programme sponsorship gives a better indication of local commercial support.

Q6. Yes. Again, it may be helpful for assistance to be provided in setting up a 'body corporate' for prospective applicants as well as advice links for sourcing set-up funding. We are encouraged that Ofcom has identified training and education, as well as strong local links, as key elements of social gain.

Q7. Generally yes but the first part of the observations in point 67 are of concern in that such a test could bias the award of licences in the first tranche towards inner city and Northern England communities. Such a test could be to the detriment of bids from communities that are equally as deserving especially in the South and the Home Counties. In many such communities, while there may be affluent sections of the populace other sections are as much in need as any and as equally deserving of a community radio station. It would seem to us that one of the main criteria, in allocating licences in the first year, should be proposals for sustainability. Community radio stations that can be established on strong tenets with equally strong local support can be used to assist future applicants. In this way, stations who are awarded licences in latter years can learn from such 'beacon' stations and learn from mistakes made in the early days of community radio.

We also agree that not only where there are insufficient frequencies but more generally licences should be awarded to groups proposing to serve equally greater aggregations of communities rather than smaller interest groups or communities.

Q8. The station's output must reflect the diversity of its community, not only as it is now but as it will develop in the near and medium future, to plan for future changes in the demographics of the community, information often best gleaned from the long range planning by national and local government.

Local community stations must be aware and sensitive to changes in their community and must change with the community, not necessarily in total agreement with any one element of that community but always open to all views.

This diversity must embrace all facets of the cultures and faiths in any town or city and any community radio station must seek to be fully accessible to all parts of the community and reflect the balance of that community.

Q9. Yes. We are fully in accord with the four areas that Ofcom has proposed as key commitments.

Q10. Yes. Such a report should be a public document – available in libraries etc – showing

how the local community radio station has met its key commitments and how it proposes to grow and develop, with objectives set on an annual basis.

Q11. As we have said, research can be an expensive item particularly as budgets for community radio stations will need to show prudence and economic efficiency. Such research as suggested here would be not only interesting but also useful as community radio develops and evolves. We would recommend that such research is sub-contracted to organisations who are proficient and experienced in carrying out such tasks and who may be able to attract social funding for such research, in a similar vein to the role taken by the Calouste Gulbenkian Foundation in the pilot project.

Other observations

1. Community help and advice is a fundamental element of a local community station's output and this might be represented in many ways - from the local MP effectively providing an on-air clinic to a phone-in or to specialist advice from local agencies and local government e.g. health and nutrition, education at all levels, debt, housing, legal matters, benefits and pensions, etc. There are also many willing contributors from within the local community who have specialist skills and knowledge that can benefit the whole community.

2. While working with political parties and community interest groups and local government agencies it must be clear that the community radio station should have no political stance but should be editorially independent and should act as a catalyst for freedom of expression and as a medium for an exchange of views.

3. Not only should a true community radio station be accessible to members of its community as contributors, and as players in the process of radio, but it should seek to empower by training members of those communities in their dealings with other media to enable them to gain skills which will benefit their own social and charitable organisations. Training in media skills might well also be offered to the local business community as a useful income generator

More extensive training opportunities should be offered to those who see radio broadcasting as a future career choice and close relationships with local education providers can make work experience possible and higher level training leading to professional qualifications available for those who choose our medium as a career path.

4. Speech/music ratios will inevitably be very different to current local commercial radio stations where many follow similar music intensive music policies and where speech is minimal. For a community station this ratio is likely to be very different. Music of course has a place and the ratio would vary throughout a typical day's programming but to be effective in communicating with the local community the speech content is unlikely to average much less than 50%.

The music policy must also be culturally and, in terms of genre, more diverse than other local radio stations can be. It must reflect the ages, interests and cultures of its audience, yet accept that some forms of music are already well catered for by other local ILR stations and may not be that strongly represented in the station's music mix. The music policy should also be regularly tested with its audience and the mix adjusted depending on regular audience feedback.

5. Some community radio stations may fail to meet their aspirations but it is more likely that there will be failures due to the lack of a sound business footing. It seems to us probable that any station that bases its existence entirely on grants and similar forms of financial support will lead a precarious existence, such grants can often be short term only and it is essential that any radio station embarking on a 5 year license must be able to demonstrate that it has in place long term funding strategies engaging a wide variety of sources over a number of years, some of which might well be grants but there have to be other revenue streams which are sustainable in the long term.

6. Advertising revenue might be one of these revenue streams but there are many

drawbacks to this funding route. While there is a school of thought that local community stations might be more economically accessible to very small businesses any substantial encroachment into the advertising revenues of local newspapers and, especially, local radio stations is likely to alienate those media who will see the newcomer as subsidised competition.

Relationships with other local media will be more productive for all parties if there is no such direct financial competition, alliances can then be formed which are more beneficial to all parties e.g. the use of the local newspapers news gathering personnel and facilities, joint coverage of sporting events, pooling of interviews, etc.

7. The financial probity of any community radio station is critical for its long term well being and this is best served by being established as a charitable organisation or company supervised by a board of trustees overseeing the work of the management and production teams. This body must be constituted of high profile individuals well versed in local community issues.

8. Although such can be expensive it seems to us essential that prospective licensees must carry out some form of RSL in the run up to their proposal to Ofcom. Only by being on air, even for a short while, can programming and presentation be developed, ideas tested and capabilities and commitment be demonstrated to the community.

9. It seems to us that there must, beneficially, be two groups of broadcasters in any community radio station. It seems improbable that any station that has no professional assistance will be successful in the short term so the involvement of some professional broadcasters with specialised skills, knowledge, and experience is a must and such employees must be able to earn sensible, close to market, rates. The other group, no less important or relevant, are volunteer broadcasters, trained by the professionals and able to broadcast as competently, the ethic being amateur but not amateurish.

Over the past decades, many established radio broadcasters have 'cut their teeth' in an amateur radio environment whether in student, forces or hospital broadcasting. Many of these organisations are very professional in their approach – to funding, operation and output – and are often described as unpaid professional broadcasters. Ofcom would do well to incorporate standards and levels of professionalism often seen in such organisations.

The Radio Foundation

The Radio Foundation, a charitable organisation, is being founded to prepare a bid for a licence for the City of Chichester and its immediate environs, which contains a growing community of approx 110,000 people.

For and on behalf of The Radio Foundation

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