

Soo Williams
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

19 April 2004

Re: Consultation on Licensing Community Radio

Dear Soo

Please find a short response from Radio Jackie, analogue FM licence holder number AL-191-1 to your consultation on the licensing of community radio.

As a member of a group that originally was seeking one of Home Secretary Leon Brittan's community radio licences in the 1980s I must say that the licensing of community radio stations is long overdue – and welcome!

The comments below are numbered to correspond with the questions you pose on page 30 of your consultation document.

1. In addition to licensing new community radio services we think that in the same way that Ofcom has set the drive towards a digital switchover as a clear priority so it should set as a goal the maximisation of the number of licensed radio services and the encouragement of community radio services as an important part of that expansion of listener choice. In particular, Ofcom should be enticing unlicensed broadcasters to operate legitimately as "community" radio stations.
2. Given the interference problems that Radio Jackie and its predecessor Thames Radio have faced from unlicensed broadcasters on neighbouring frequencies I'm sure you will understand why we don't see that support for a new tier of community radio stations should also mean that "community radio should have a higher priority for resources than potential improvements to the coverage of existing FM commercial radio stations" (para 29, pg 13). More efficient spectrum planning, coupled with a fairer allocation of spectrum between BBC and non-BBC services, should mean that services like our own could be permitted to provide services with commercially sustainable, robust, field strengths throughout their measured coverage areas *and* still allow new "community" radio services to be launched. Ofcom should not be pre-determining transmission powers for new stations. The determining factor should be the field strength of the new licensees such that this achieved the goal of serving the intended community of interest target audience.

3. Yes!
4. Yes.
5. We are inclined to agree with our old adversary Brian West, the former Director and Chief Executive of the AIRC when he wrote in "The Radio Magazine" recently advocating that community stations be restricted to sponsorship revenue only. Trying to enforce or measure a limit of 50% funding from spot ad sales will be unnecessarily complex. Added to the provision of grants from the fund announced by the Secretary for Culture, Media and Sport this should also help develop a diversity of listening experiences.
6. Yes.
7. Yes.
8. Ofcom should seek to prioritise the provision of community radio services in areas where there is a clear demand for additional radio stations as demonstrated by the presence of a large number of unlicensed broadcasters. We disagree with the suggestion that neighbourhood services should be prioritised ahead of community of interest stations in urban areas.
9. Yes.
10. Yes.
11. Any research into the impact of new community radio stations undertaken by Ofcom should be limited in scope and cost and funded from savings within the current Ofcom budget for regulating radio.

Should you wish to discuss any of our responses to your consultation paper further please don't hesitate to contact me.

Yours sincerely

Peter Stremes
Managing Director