

**ROYAL NATIONAL INSTITUTE OF THE BLIND'S
RESPONSE TO OFCOM'S CONSULTATION ON
LICENSING COMMUNITY RADIO**



1. Introduction

1.1 Royal National Institute of the Blind (RNIB) is the leading organisation representing the needs and interests of the two million people in the UK with a sight problem. The organisation provides over 60 services and campaigns for social inclusion and equality of access. It works directly and indirectly with blind and partially sighted people, representative organisations, visual impairment professionals, national and local government, the broadcasting and entertainment sector, and a range of public and private organisations.

1.2 RNIB strongly supports the concept of local and community radio. Local Radio has provided an invaluable platform over the years for the delivery of local news and information and for involving communities in local activities. Local radio stations have often offered opportunities for non-professionals to become involved in broadcasting, giving people a voice and an opportunity for wider campaigning and developing new interests.

1.3 Local radio has been wholeheartedly welcomed by blind and partially sighted people, who are so dependent on the broadcast media generally but in particular for access to local news and information. In the past local radio stations have been in the forefront of developing programming for people with a visual impairment. However, in recent years this situation has changed with fewer opportunities for specialist programming. In addition the areas covered by local radio stations are getting larger, thereby destroying much of the benefit they brought in their early days. Real local news is essential for those people who cannot access their local newspaper.

1.4 RNIB is currently involved in a community radio project in Glasgow aimed at people with a sight problem (VIPONAIR) and is, therefore, interested in how similar services could be developed throughout the UK. Another key partner in the project is BBC Scotland.

1.5 RNIB supports the principle of community radio as outlined by Ofcom, in particular that it is for social gain; that it can serve a community of interest, as well as a geographic community; and that it offers opportunities to the targeted community.

1.6 RNIB has responded to the questions posed by Ofcom in the consultation paper in the following section.

2. Question 1: What role should Ofcom have in respect of community radio, beyond the licensing of new services?

RNIB response: RNIB feels that Ofcom should

- have responsibility for ensuring that there is an appropriate mix of community radio channels, particularly for those that are aimed at a particular geographic area. This should ensure that there is a range of output that is available to listeners.
- have a role in ensuring effective training is available, either by providing it direct or ensuring that local/regional training facilities are available.
- ensure that the availability and benefits of community radio are promoted either by providing a direct service or by working with licensees.
- ensure that community radio stations are meeting their commitments and are reaching their target audience.

Question 2: Do you agree with our proposed policy for the allocation of spectrum and the size of coverage areas for community radio services?

RNIB response: RNIB is concerned about the possible limitations of the proposed coverage areas. The definition of coverage areas linked to frequencies does not take into account the benefits to a community of interest, whether it is local, regional or national. For RNIB the need for targeted services to reach as many of the 2 million people in the UK with a sight problem as possible is crucial. If use of the FM frequency restricts flexibility Ofcom should be considering more effective use of AM.

An example of a system that works well both for the provider and the audience is Radio for the Print Handicapped in Australia, which runs a very effective community radio service using licences that are co-ordinated at a state and national level. This service is able to provide networked and local programming through the same frequency.

RNIB believes that there is a case for having different criteria for awarding licences on a community of interest basis and on a geographic community basis. This is particularly relevant when

taking into account the proposal “that no group holds more than five community radio licences at one time”. (Paragraph 56)

Question 3: Do you agree that community radio should be an applicant-led process with an annual 12-week period when applications can be submitted for any neighbourhood or community in the UK?

RNIB response: Whilst RNIB can understand Ofcom’s desire to have only one advertising window per year that covers all applications, we share Ofcom’s concern about the possibility of an overwhelming number of applications at one time. RNIB recommends that the application process for 2004 is treated as a trial so that an assessment can be made by both Ofcom and the applicants on whether or not this system is workable.

Whilst it is useful for the consultation paper to outline Ofcom’s proposed priorities for 2004 it will be essential for prioritising criteria to be part of the application process, along with the selection criteria.

Question 4: Do you agree with Ofcom’s proposal to invite submissions from commercial radio operators if they consider that their economic viability might be affected by the provision of a community radio service, based on the application proposals?

RNIB response: RNIB feels that this proposal does go against the principle of community radio. The fact that this use of the spectrum has been identified shows that existing broadcasters are not meeting the full needs of the audience. RNIB does not consider that this additional barrier to the setting up of a station is helpful to the overall process.

However, RNIB recognises that Ofcom has a responsibility to ensure best use of the spectrum and recommends that Ofcom defers a decision on this proposal. An assessment of the impact of community radio stations should be made one year after the start of transmission of the first licensees so that Ofcom can assess whether or not they are damaging the economic viability of other providers.

Question 5: Should there be a general limit of 50% of annual income that community radio stations are permitted to obtain from the sale of advertising and sponsorship, or should this be decided on a case by case basis?

RNIB response: RNIB feels that setting a limit is too prescriptive and that to enable applications from as wide a range of organisations as possible the limit should be set on a case by case basis. The assessment could be made on the basis of the type of organisation, its proposed service and target audience, and its funding sources and possible partners.

Question 6: Are you content with Ofcom's proposals for the submission of applications?

RNIB response: RNIB feels that the submission proposals are fine. However, we would like to reiterate RNIB's concern about the potential limitations for serving a community of interest presented by restrictions on the number of licences per group. (See response to Question 2 above)

Question 7: Are you content with Ofcom's proposals for the order in which it will consider applications in the first year?

RNIB response: As mentioned under Question 3 above RNIB feels that whilst it is useful for the consultation paper to outline Ofcom's proposed priorities for 2004 it is essential for prioritising criteria to be part of the application process, along with the selection criteria.

Where appropriate Ofcom should ensure that members from the Consumer Panel and/or the Advisory Committee for Elderly and Disabled People are involved in both the initial selection process by the Radio Planning and Licensing team and the discussions by the standing committee.

Question 8: Aside from the Government's selection criteria, what other criteria should Ofcom use when deciding between applications?

RNIB response: Whilst supporting the criteria outlined in Section 46 of the consultation RNIB is concerned by the suggestion in Section 67 that neighbourhood services should take priority over

community of interest stations. Applications should be judged on whether or not the provider will meet the needs of its target audience, particularly if that audience is currently under-served.

Question 9: Are you content with the proposal for listing a station's key commitments in its licence?

RNIB response: RNIB feels that this proposal is acceptable.

Question 10: Are you content with Ofcom's proposal that each station should produce an annual report?

RNIB response: RNIB feels that this proposal is acceptable.

Question 11: Do you have suggestions on how we might research the impact of community radio services on target communities or on other methods of seeking feedback from communities?

RNIB response: Areas the research should focus on must cover the aims of the provider as detailed in their application and include:

- whether or not the output is meeting the listener's needs and interests
- whether or not listeners feel that they have the opportunity to provide their own input (if they wish to)
- the frequency of listening, related to listening to other forms of radio broadcasting and time of day
- do listeners feel the station is providing a unique enough service.

Research methods will have to differ depending on the type of station, eg geographic v. community of interest. Whatever methods are selected it is essential that all sectors of the "community" can be reached and have the opportunity to respond in the format of their choice.

3. Conclusion

3.1 As mentioned in Section 1 RNIB strongly supports the principle of local and community radio because of the benefits that they can deliver to people with a sight problem.

3.2 RNIB feels that the future availability of community radio could be an ideal opportunity for voluntary sector organisations to reach their beneficiaries.

3.3 RNIB is pleased that the Government has recognised the need for community radio and welcomes the provision of a grant scheme.

RNIB
19th April 2004