

Dear Soo,

Please find below a response on behalf of Resonance104.4fm to the Ofcom proposals for community broadcasting. I hope this is useful. Sincerely
Ed Baxter

Question 1:

What role should Ofcom have in respect of community radio, beyond the licensing of new services?

* Acting as an advocate for community stations (ensuring perhaps that the Government provides adequate funding for them). Liaising with the CMA as a support network designed to enable communities to make the most of the experience of running radio stations (through creating partnership agreements, providing access to resources for people to gain skills and knowledge).

Question 2:

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

* The aim should be to make the largest number of licenses available. The community of interest stations should be considered for wider coverage areas, as listeners in the same city will all want to receive the signal wherever they happen to live. (There is demand for Resonance, for example, to be broadcast to the whole of London, and perhaps beyond. This is perhaps a problem confined to London and other large cities.)

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?

* Yes.

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?

* No. There should surely be some clear distinction, which it is Ofcom's role to define, between communities of interest and communities of commerce. The community stations will probably have to follow regulations that will create little conflict of interest or competition for the same funding as commercial radio operators. Because of the perceived threat that a new layer of broadcasting may bring, and due to the need to differentiate legitimate conflicts from obstructive complaints, it will be necessary to carefully consider how to manage this process. If invitations are extended to the commercial operators to make submissions as a matter of course, it may be perceived that their point of view is primary.

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?

* This should be decided on a case by case basis, as the economic conditions and provision of other radio services vary around the country.

Question 6:

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

* Yes. The process should be designed to be as straightforward as possible, with the clearest possible presentation of information. Navigation of Ofcom's current website is problematic.

Question 7:

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

* Yes. The order is justifiable given that the pilot stations should be informed as soon as possible whether they will be able to continue, so that they can make provisions for broadcasting long term and secure funding. As it stands, they are already in a relatively disadvantageous position to secure funding for 2005, as they will not know if they are a viable project until October 2004 at the earliest. Having acted as willing guinea pigs throughout, the information they have provided has surely proved invaluable to Ofcom.

Question 8:

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

* Current broadcasting activity and responses from the press, public and industry. "Secondly, it has been argued that where frequencies are scarce Ofcom should choose groups covering a broad range of interests and with a diverse social and cultural base, rather than those with a single community of interest focus; that is neighbourhood services rather than community of interest stations. If Ofcom prioritizes neighbourhood services, this will be at the expense of community of interest stations, particularly in urban areas."

* Community of interest stations (such as Resonance) may have the broadest range of interests and the most diverse social and cultural base of any station, therefore this suggestion is problematic. Based on the experience of Resonance a useful criterion would be: How far the proposed service will enhance the listener's enjoyment of radio as a medium, how far it will extend an understanding of the communicative possibilities of radio, and how far it will widen the listeners interests and activities. Tied into this are other attributes that will be applicable to the more ambitious stations: innovative programming; development of new radio formats; artistic and cultural as well as social gain; creation of new models for community broadcasting that others will want to follow; and utilization of new technologies.

* As regards the proposed scoring system ("We intend to make the details of this system public, but not the scores awarded to individual applications"), is there any reason not to make this entirely public?

Question 9:

Are you content with the proposal for listing a station's key commitments in its license?

* "Information on how the delivery of the key commitments is to be measured and evaluated..." This should be as simple a process as possible.

* Measurement of social gain could usefully be defined by Ofcom, perhaps with reference to Professor Everitt's published research and

announcements of subsequent and on-going research by Ofcom (due to be published in summer 2004).

* Does Ofcom intend that community stations provide formal, standardized broadcast training for volunteers? If so, this should be clarified.

Question 10:

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

* Yes. This is something we will in any case try to do before the next round of applications. We'd suggest that other pilot stations might do the same as a useful continuation of our working relationship with the Radio Authority/Ofcom.

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?

* We have had success with questionnaires at radio-sponsored live events. We also have a questionnaire on our website, which is well and frequently used. In terms of its influence on its listenership, reflected in website forum activity, emails and phone calls to the station, and in wide-ranging press interest, our effect on the radio ecology and on the community seems very clear: Resonance provides a blueprint for community radio activity, a flagship project which encourages the community to be bold in its demands as listeners and programme makers. Its growth within a very brief time clearly indicates the impact of community radio.

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