

Radio Dialect – Community Internet Radio

Response to Ofcom consultation document “Licensing Community Radio”.

Introduction

Radio Dialect is a community internet radio station based in Bristol. We made our first internet broadcast in November 2002, in a pilot which saw 5 airings of a weekly show, 'Dialect'.

In November 2003 we received £6,500 funding from the Millennium Awards Scheme, administered by the Scarman Trust. We used this money to set up a small studio in central Bristol, from where we have broadcast a weekly internet-streamed show on Thursday evenings for the last 3 months or so. This is our flagship show, 'Dialect', which we describe as a community magazine programme, and which features an hour of local community content including features and interviews, and music by local artists. The magazine show has a DJ hour before and after the show bringing our Thursday evening show to 3 hours. Additionally we have introduced a music show on Wednesdays hosted by a volunteer from a local community cinema and featuring interviews with local people. Our website is at <http://radiodialect.net/>

This kind of small scale internet operation is often known as 'microradio' (<http://www.microradio.org/>) although in the US it is also used to describe low power radio stations.

We have decided to respond to the Ofcom consultation document 'Licensing Community Radio' because we feel our route toward community radio broadcasting is both an unusual one, and one which will become more common in the future. We wanted to ensure that issues facing microradio operations like ourselves would be taken into account.

The Questions

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

It is likely that many participants in the new community radio station will have had little or no experience of 'real' radio. These participants will therefore require a great deal of support and advice, for example concerning regulatory or operational issues. We consider that Ofcom would make an ideal 'one stop shop' for community radio operators to get advice and support.

Further to this support role, Ofcom could arrange for experienced members of the radio industry to act as mentors to community radio operators in all areas including advice on programming, staffing, business planning and technical issues. These mentors could be chosen from commercial or BBC radio stations in areas local to the community radio operators. Ofcom could supplement this mentoring by providing or facilitating provision of training.

An additional role in which Ofcom could provide support to community operators is by acting as a gateway to funding sources. The proposed limit of 50% of income to be derived from advertising and sponsorship implies

that these operators will be compelled to seek grant funding. Ofcom could research the funding 'market' to find funds which might accept applications from community radio stations, and make this information available to potential and incumbent community radio operators. We note with approval that Ofcom will be administering any funding the Government provides for community radio operators.

There is no viable open-source software solution for radio automation and running order scripting. Ofcom could fund the development of such software, which would then be available for use by the community radio operators by virtue of an open-source licence. Doing so would give the advantage of being able to specify features which might be particular to community operators' needs, such as allowing potentially large numbers of volunteers to access relevant parts of the running order in a secure way, and to automatically generate a public-facing web archive of the show, such as we have at <http://radiodialect.net/>. Currently the creation of these archives takes us more time than putting together and broadcasting the actual shows.

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

Radio Dialect is based in the centre of Bristol. A 5km radius would allow us to cover 80-90% of the city. It would appear that Bristol is slightly too big to be entirely covered by a single community radio station. We would like to see Ofcom considering cases like ours for a discretionary increase in the 5km limit. Alternatively we would like Ofcom to consider automatically licensing an additional AM frequency with a greater range than 5km for community operators (with a general community remit, not 'community of interest' stations) in similarly sized cities so that they may cover the whole of their cities.

- 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?*

We agree that the process should be applicant-led and that it should not be limited to one or more regions at a time while not considering some regions.

- 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?*

Unfortunately we cannot agree with this proposal. We would have concerns about commercial operators raising unfounded objections and hampering the growth of legitimate community radio operations. We consider that Ofcom's role in this respect should be to facilitate the uptake of community radio, not to impede that process. It seems inevitable that any new radio operator who sells advertising, whether the operation is commercial or community based, will have some negative impact on advertising revenues of all other stations selling advertising in the same geographical area. We would have concerns that commercial operators would be keen to show this as *affecting* their economic viability.

Additionally, many so-called local commercial radio operators seem to have anything but a local focus. We have found in our operation as an internet-only community radio station that there are many, differing groups of people who are keen to voice their opinions and issues on our shows; these people do not feel they have the same access to local commercial radio.

Additionally, we have been pleasantly surprised by the amount of high quality music we have received, and continue to receive, from local bands and musicians who are keen to have their music played. The high quality of this material cannot be understated – we continue to be amazed at the talent of many of these unsigned artists and we are keen to provide them an arena for their music to be heard. Needless to say, these artists do not feel they have any access to local commercial radio, nor would they be necessarily keen to have their music played on stations whose music programming policies seem to be unnecessarily bland and biased toward well-established artists.

In summary, we do not feel that, in general, commercial radio operators provide much useful local community content (we recognise that there are exceptions). Therefore we do not consider that they should have a say in the process of granting community radio licences. We feel, rather, that Ofcom should instead ask the commercial operators to submit a report on their current financial viability, for example to include a financial report. Ofcom could then determine which commercial stations, if any, they feel would be at financial risk if a community licence was granted in that station's geographical area.

In making this assessment Ofcom should consider that it would take several years for a community radio station to attract enough listeners, and therefore advertising revenue, that it could pose a threat to commercial operators.

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?

We recognise the recommendation of Professor Anthony Everitt that diversity of funding can help ensure editorial independence. We would like to see this requirement relaxed in cases where a verifiably independent editorial board decided editorial policy. Such a board should of course be drawn from the local community and safeguards should be put in place to ensure the board is representative of the community at large. Where such a board could be set up to Ofcom's satisfaction it would appear that the cap on income coming from sponsorship could be removed. We think it would at least be worth piloting this method of ensuring editorial independence.

Another option would be to amend this requirement to 'no more than 50%, or £x00,000 per year'.

Our concerns in this area are that, if awarded a community radio licence, we would have few other income opportunities than advertising revenue. If, for example, we could raise say £20,000 a year from selling CDs, T-shirts etc, or whatever other business operation we could wring from our setup, such as voice talent recording for example, we would then only be able to raise a further £20,000 from advertising. £40,000 per year would not seem to support a wide range of programming or schedule coverage. It should be noted here that these numbers are literally 'top of the head' examples to illustrate our general concern here.

We recognise that it may be the intention of the Government and Ofcom that community radio operators seek grant funding to make up the shortfall in income. However, it should be recognised that all suitable grant funds are likely to have a great many applications from community operators and it is possible that there might not be funds available for all applicants. Additionally, as community operators will be part of the burgeoning 'social

enterprise' sector, they may wish to reduce their reliance on grant funding. Further, it must be recognised that while many parts of the UK have enjoyed a high level of European funding for the last several years, this funding is likely to dry up in the next few years as the EU focusses on Eastern and Central European countries.

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

We agree on the whole with this proposal. While we recognise that Ofcom would not wish to receive promotional audio CDs we think it important that Ofcom require the submission of an example show or show segment, on CD or other audio format (perhaps MP3), in order that the quality and reach of the station's repertoire can be assessed.

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

We think that the social gain aspect of an application should be assessed when determining the order in which to consider applications. We agree with Ofcom's focus on social gain as the key characteristic of community radio and so we would like to see applications which offer a high degree of social gain for their communities considered before applications which do not.

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

Inevitably in this regard we are somewhat biased. We would like existing internet and pirate microradio operators who already have a community remit to attain a greater priority in the selection process. Our reasoning for this is that such operators will have gained much experience in the provision of community programming and would therefore be in the best position to provide the most value to their communities, in the shortest period of time.

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

Yes.

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

We are pleased to see Ofcom's acknowledgement that the creation of this report should not be so burdensome as to disadvantage small operators.

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?

While we do not have many specific suggestions, we believe Ofcom should use the community radio stations themselves, wherever possible, to gather feedback from communities. Ofcom could commission a radio programme to raise awareness of the issues they seek feedback on and require the community stations to carry this programme in their schedule. Ofcom could additionally provide a prize draw to encourage responses from the community, and provide a freepost address and a website for individuals to submit their feedback.