

Response to OFCOM Community radio consultation document by Salford community radio project and its steering group.

Question 1:

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

There needs to be positive methods of monitoring the community licences/stations that ensure the core beliefs of community radio are maintained. The idea of sending in annual reports is positive. It was also suggested at our community led steering group that random monitoring of the output might ensure the stations stick to their commitments.

Ofcom may also like to consider how it promotes community radio opportunities and the provision of guidance for applicants and prospective applicants.

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 size of coverage raised concern amongst the Salford Community Radio steering group.

The project has worked in all 9 areas of Salford over 3 years. This has given all the people of Salford a taster of community radio. This in turn has successfully 'fired up' Salford for community radio. One area in particular Seedley and Langworthy FM has run 3 stations. The other areas of Salford want to participate and have shows that reflect their own area however they do not have the capacity to run their own stations. There is a very clear show of hands in Salford for this idea of community led Salford radio to assist with problems of identity and provide a voice for an area often overshadowed by Manchester. A 5km radius would not cover the whole city.

The steering group felt that FM was the only way forward. One of the young people present said that broadcasting on AM was perceived as rather obscure and that his experience had seen interference at night time. He said 'AM broadcasting made community radio look second best'.

The limited availability of FM frequencies caused concern at the last RSL. Many community members rang to say that it was hard to locate the station as it was sandwiched between 2 commercial stations. The idea of reviewing frequencies particularly the BBC stations who at present have a broad spectrum is a positive step towards community radio and the BBC working side by side.

If only one licence was available within Salford, a 5km radius would leave gaps in the provision across the area. Would a Salford wide community radio licence be permissible if satellite studios across the local areas of Salford ensured localised access and output?

Frequency availability needs to be addressed more fully. What exactly does this mean, in terms of how many licences will be available across how big an area. For example will Salford be competing for frequencies allocated to Greater Manchester, or will a number of licences be allocated for Salford alone?

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?

Surely it would be better to allocate licences on a similar basis to the commercial model. (i.e. Have a timetable for licence availability across the UK throughout the year on an area by area basis. Perhaps starting with areas already proving high demand first, rather than having hundreds of applicants competing for a finite number of licences across the UK all within a 12 week period, year in year out.

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?

It is understandable that the commercial operators should feel threatened by new stations. However if the format for what is a community radio station is clearly defined in the first instance, there will be no need for commercial stations to object. Their target audiences and advertisers are vastly different. The money coming in to community radio advertising and sponsorship should be thought of as new money. It will come from different sources to those advertisers who already utilise commercial stations. We are not sharing the same pot. The commercial stations would need to present researched evidence in order to oppose a community licence and there should be an opportunity for the community station to put forward a response. It is not OFCOM's job to protect the commercial stations profitability by limiting the listeners' choice. Local communities deserve local radio.

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?

No, as long as a community radio station is not for profit, (i.e. set up as a social enterprise, community interest company etc) and is clearly producing community radio as opposed to competing with commercial interests as outlined above, why should there be a limit as to how stations fund themselves? If these new stations are to be sustainable it is important that they are not grant dependant.

Question 6:

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

Ofcom should consider how it helps applicants through this process. Application forms can be daunting and some community led groups may have the radio experience but not the form filling experience. Some help and advice on funding should be considered too.

Question 7:

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

If the granting of licences is based upon broadcast experience then the presumption is that the pilots will be first. If the granting of licences is to do with widespread and diverse community engagement and radio training ie social gain, then they need to look at the broader picture. Alternatively (See our reply to Question 3). The process should be timetabled on an area by area basis with high demand areas topping the list.

Question 8:

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

It would help if OFCOM were to ask what unique criteria pertains to each licence applicant. The panel need to look at the present identity of an area. A licence in Salford will strengthen a community that to date struggles with its identity and is often bypassed. The impact on the community of RSL's to date has been far reaching and a permanent licence would address a real issue in Salford.

Question 9:

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

Key commitments are very important. They provide a basis upon which to build a station. It is important to recognise the nature of a community station. Key commitments should be worked through on an individual basis to ensure that they fulfil community radio criteria but are realistic and achievable for the applicant organisation to cope with, based on its structure, funding, experience, staffing etc. The Salford project broadcasts have been run by volunteers and consequently they have changing dynamics due to the following :- volunteers having changing personal commitments, stability of funding and long term sustainability. This can and does affect your outputs.

Question 10:

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

All stations should be accountable and willing to provide an evaluation. This revisits the aims of the station.

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?

Ofcom may wish to look at Social Auditing as a tool that would best measure the impact of community radio services. A social audit could be part of the annual report process. Community radio is not about listening figures but very much about participation.