



## TINDLE RADIO LTD

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16th April 2004

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

Dear Soo,

### **Ofcom Consultation on the Licensing of Community Radio**

Tindle Radio fully endorses the views and the replies to the questions put forward in the CRCA response document. We would also like to make the following points to your consultation questions.

Question 4: Our stations do not have either the financial or human resources to undertake research on the damage likely to be done by a community station. We believe that any research should be funded by Of com and undertaken by an independent research organisation. Of com should protect small stations of under 100,000 MCA who by their size are already "community stations" by not licensing community stations within their TSA.

Question 5: You cannot be half commercial! Hospital radio has survived and thrived on volunteer support and local fundraising initiatives. If there is truly a demand for community radio then they should raise funds in a similar manner. Many Tindle stations depend on small advertisers who spend as little as £50- £100 and this revenue stream could be seriously threatened by commercial community radio. Furthermore as we have experienced with GTFM in Wales being mixed funded allows community stations to offer below market rates for airtime which has the effect of devaluing the market for a commercial station. Small commercial stations would typically earn 96% of their revenue from local advertising.

Question 8: Of com should look carefully into the background of applicant groups and explore their motives. Are they ex-employees of nearby commercial stations or unsuccessful applicants for a commercial radio licence who may have a personal agenda?


Question 10: Community station's annual reports should be audited by Ofcom. In the pilot scheme the CRCA has identified claims by some community stations which on the face of it cannot be substantiated. In the first two years these audits, spot checks and monitoring should form part of Ofcom's report.

Conclusion:

Community Radio has been heralded as the new "third tier" of radio however this third tier has existed for some years in the form of small local stations many of which struggle to make ends meet or continue to be subsidised by radio groups. We hope that the floodgates do not open for community radio but there is a controlled and carefully monitored programme of gradual development. In particular Ofcom should ensure that the first wave of community stations fulfil their social objectives, do not bend the rules and more importantly do not damage or devalue the market place for a small financially marginal commercial station.

I hope you find Tindle Radio's response useful. Please do not hesitate to contact me if I can be of any further assistance.

Kind regards  
Yours sincerely



Kevin Stewart  
Chief Executive  
Tindle Radio Limited

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