

# Touch FM

## Community Radio Consultation Responses

### Question 1:

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

### Response:

In addition to the needs identified by Ofcom, I would like to see Ofcom make the public more aware of the existence of Community Radio and to conduct listener surveys. This would also provide an opportunity to monitor the Social Gains promised by the stations.

### Question 2:

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

### Response

I am in agreement with the allocation of spectrum but I am concerned that the impact made by those stations that previously ran RSLs will be diminished by the proposed coverage area. We have documented evidence of the need for a full-time Christian station in Milton Keynes and in response to the regular question of "why only 28 days?", we have been promoting the soon arrival of Community Radio. Limiting the coverage area to a 5 km radius will mean a loss of coverage on many areas, where we previously had listeners.

### 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?*

### Response

I believe it should be applicant led because Ofcom cannot be certain that a group or groups will be ready in a region chosen by Ofcom.

### 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?*

### Response

This would depend on how much weight their submissions would carry. A commercial station could use this as a means of suppressing a perceived rival. It is my belief that the listener should be allowed to choose their station of choice based on programme content and the fulfilment of their needs.

### 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?*

### Response

I believe this should be decided on a case by case basis because, as a Christian station, we may not attract much in the way of advertising but rather from sponsorships of listener donations. Also, some funding organisations can be reluctant to fund projects that are narrowly religious.

**Question 6:**

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

**Response**

I have one area of concern and this could be resolved by a clearer definition of the term "body corporate" under the heading of "Eligibility Criteria", p.16. "Body corporate is by definition a Limited Company which is run for a profit. This would make it contrary to what the Government and Ofcom has in mind for community radio. Based on Ofcom's aims and Social Gains intended for community radio, a Charity would be the ideal vehicle especially when you consider that charities are publicly accountable and are run for the benefit of others, rather than for its own profit. This is a vital part of the process and I urge that the definition be clarified with some urgency.

**Question 7:**

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

**Response**

I am in agreement with the step one, but believe that two and three should be reversed.

**Question 8:**

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

**Response**

I believe some consideration should be given to the radio experience of the team making the application.

**Question 9:**

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

**Response**

Yes. This will serve as a reminder to the station of its purpose and the standards by which it will be assessed.

**Question 10:**

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

**Response**

Yes. Especially when considered with question 9.

**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?*

**Response**

In the first instance, an advertising campaign should be conducted to promote the existence of community radio. This would be followed by RAJAAR type surveys in each area. In addition, stations could run adverts to recruit listeners who would be willing to complete an Ofcom questionnaire.