

CELTICA RADIO

WWW.CELTICARADIO.COM

PO Box 48. Bridgend. CF32 9ZY.

Neil Stock
Head of Radio Planning & Licensing Ofcom
Riverside House
2a Southwark Bridge Road London SE1 9HA

Thursday, 26 February 2004

Dear Mr. Stock,

Re: Radio Consultation Paper 05/02/04.

In response to the proposals for licensing new Radio services. We the undersigned directors make the following observations.

1.1 Approach to Community Radio.

We would like to see a new approach to community radio, which encourages stronger connections to the community with impartial and real accountability to the people these stations serve.

1.2 Digital Radio

We believe that the best way to achieve better take up is to allocate, for a set period of time, additional low power analogue licences. These licences could be on both AM and FM bands and would be used for Radio groups who submit proposals which include simulcasting on a digital platform. A condition of this licence would require these broadcasters to actively, and extensively, promote their Digital output to encourage listeners to make the switch. After a set period, [perhaps one year] the digital broadcaster would surrender their analogue frequency, to be re-allocated to another digital broadcaster.

The selection criteria for groups willing to take this chance, should allow all new applicants [but not existing analogue broadcasters] the opportunity to be granted licences, subject to frequency availability and them meeting a defined standard and business viability test which would be clearly set by the regulator.

1.3 RSL's

We submit that there should be a reduction in costs to allow less affluent groups the opportunity to broadcast, and a streamlining of the application process.

1.4 Localness

We believe that local radio should be managed and in the main, staffed by people from the area that they serve.

2.1 Clearer Processes

2.2 Guidance

We agree that clearer guidance is required, and should include an enforceable statement of intent, which guarantees that all proposals submitted in an application are adhered to. It is not satisfactory to say that a certain amount of leeway should be given, as absolute statements may require applicant groups to enter into arrangements, which may not be possible at the time of the application stage. We believe the application should be a statement of fact, and if an arrangement is not confirmed, then it should say so in the public application, or be omitted.

Application Process

Our board feels that the regulator should take this opportunity to redefine the selection process. At the moment, applicants are effectively required to engage in a beauty contest. Sometimes, several groups have contributed to the groundwork in bringing a local radio licence to fruition. Unfortunately, this has created a situation where teams of talented and very experienced broadcasters are being excluded from contributing to the medium, should they not be successful in an application. As this is a process that is organised in law by the regulator, we feel that the regulator has a duty of care and an obligation. All applicant groups invest a great deal of money in doing the groundwork, and in most cases the staff, have worked for nothing. We believe that all interested parties should be given the opportunity to contribute to a licensed area where only one licence is deemed to be operable.

Over the past three years, there have been many statements made by the regulator saying that they want radio to become more "Inclusive". However, our organisation has been contacted by hundreds of broadcasters [and new music artists - 2.4] who have found the reality to be very different to the public statements made by the regulator. In this instance we appeal on behalf of those who are not represented by organisations like the Community Radio Association or the Disk Jockey Federation.

Therefore, taking the lead from this new regulator, we propose an application process that does not create an environment of have and have-nots. If there is more than one applicant group for an advertised area we submit that there should be provision to ensure that all interested parties are included. Perhaps by offering an additional lower power frequency or as defined in: 1.2 Digital Radio, subject to them meeting a defined standard and viability test. Or even by enforcing a merger of the groups as the legacy regulator the ITA did in 1968 with the ABC and Redifusion Television companies.

2.4

Inclusion

We have also noted that there are a number of new radio companies who propose innovative and original programming concepts such as daily play listing of new music during peak programming hours. It is encouraging that Ofcom have stated that they wish to bring in "New Blood" to encourage diversity of ownership, with new and completely independent groups being given the opportunity to operate radio services. At the moment the reality is that established radio companies have a

successful, but set format, which is not giving proper representation to innovation or new music.

We believe that the element of chance should be removed from applications that are made by completely independent groups who propose new programming ideas. These groups should be given the opportunity to set up and operate a permanent broadcasting licence once they have satisfied a number of viability tests.

Conclusion

We believe that these consultations represent a fundamental step forward to enabling groups like South Wales based Celtica Radio to at last be able to realise their ambition to serve the people of our area and benefit from our member's contribution to the radio industry.

We have given a great deal to the radio industry and now wish to formally register our intent to the regulator of our determination to operate a permanent radio broadcast licence.

Yours faithfully

William Everatt
Managing Director

Distribution List

Carwyn Jones
Welsh Assembly Government Member for Bridgend

Tessa Jowell! Minister for Culture

And within Celtica Radio

Board of Directors

Jane Cullen, C1 Civil Servant.
Chair - 21 years contribution to the Radio industry.

Sergeant Edward Risby RAF.
Company Secretary - 16 years contribution to the Music & Radio industry.

William Everatt, MOD GSE Controller.
Managing Director - 25 years contribution to the Radio industry.

David A Cook, MOD Instructional Officer.
Founding Director - 31 years contribution to the Theatre and Radio industry.

Rev. Wing Commander Keith Berry Davies RAFR. Director - 38 years contribution to the Radio industry.

Richard Lee, Businessman.
Director - 15 years contribution to the Music & Radio industry.

Station Membership

Fred Stacy
20 years contribution to the Music & Radio industry.

Karl Burtonshaw
27 years contribution to the Radio industry.

Peter Davies
15 years contribution to the Radio industry.

Lloyd Coles
40 years contribution to the Radio industry.

Steve Edge
27 years contribution to the Radio industry.

James Lewis
30 years contribution to the Radio industry.

Mick Allen, Service Manager 6 years as a music producer.

Also,

Shaun Bastin, Clive Williams, Jonathan Vaughan, Geraldine Caulfield and the many broadcasters and new music artists who have contacted us to offer their support.