

Key Commitments change request form

Community radio station name:	Radio Panj
Licence number:	CR100 535BA/1
Licensee (company name):	Radio Panj Ltd
Contact name:	Jaswinder Singh Dulay
Date of request:	25th October 2018

Details of requested change(s) to Key Commitments

A community radio operator may apply to Ofcom to have the station's Key Commitments amended.

Please complete the table overleaf by including your current commitment in the left hand column and your proposed revised commitment in the centre column. In the right hand column please give a brief explanation as to why you wish to make each change.

We also require you to complete a second table which asks you to explain your proposed changes with reference to the statutory framework.

If you do not provide an explanation for your proposed changes and a completed comparison table, Ofcom cannot consider a Key Commitments change.

Please complete this form and return it to: community.radio@ofcom.org.uk

Existing commitment (as in your published Key Commitments) Please only include one commitment change per row, and add more rows as necessary into the table.	Proposed revised/new Key Commitment	Reason for proposed change
The service provides original output for 18 Hours per day	Reduce original output commitments to 15 hours	<p>We are a highly interactive service and this is valued by our listeners. However we find that there are only around 15 hours per day that are very popular and the listenership across the remaining 3 hours is far lower. Reducing the number of hours will allow us to concentrate harder on our existing 15 hours</p> <p>By reducing from 18 to 15 hours we will be able to concentrate the effort on those hours, improving the quality of programming overall</p> <p>We believe the overall effect of the reduction will be an improvement in programme quality overall. The cost will be removal of live programming from hours that attract little listenership anyway and we aim to cover those reduced three hours with locally produced output.</p> <p>We have consulted listeners and they strongly support the change</p>

Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified¹) Ofcom must be satisfied that your proposed changes **meet at least one of the criteria referred to below**.

Please indicate which of these criteria you believe your proposed changes satisfy by deleting YES or NO as applicable, and provide an explanation for why you consider a particular criterion is met in the relevant box. You should note that even if Ofcom is of the opinion that your explanation of your proposed changes meets one or more of these criteria, there may still be reasons why Ofcom is unable to consent to the change. When explaining your proposed changes, it is not enough to state that you believe one of the criteria is met. You must also demonstrate *why* you consider that at least one of these criteria is met.

In particular, if Ofcom is not satisfied that the changes would not substantially alter the character of the service (criterion (a) below), Ofcom cannot consent to the change without consulting on your proposals.² If this is the case, we will contact you to confirm that you are happy for us to consult on your proposed changes, and whether you wish to make any changes to your request in light of the need to make it public.

As part of our consideration of your request to make changes to your key commitments, we require applicants to provide an explanation for **at least one** of the criteria below.

(a) In your judgement would the proposed changes substantially alter the character of the service?	YES/NO please explain why below
No. By concentrating the efforts in less hours it will improve the service overall	
(b) Do you consider that the proposed changes would narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community?	YES/NO please explain why below
No. The listenership in the proposed hours is low. It will actually widen the range as more resources can be put into other activities such as training, bringing a wider range of presenters onto the station	
(c) Do you believe that there is evidence that, amongst persons comprising that community, there is a significant demand for, or significant support for, the changes that you have proposed?	YES/NO please explain why below
Yes. We have surveyed our listeners and they believe that both concentrating our resources on the core 15 hours and training new presenters will overall make for a far better service in both the short and long term	
(d) Do you consider that your proposed changes would be prejudicial to the access by members of that community to	YES/NO please explain why below

¹ As amended by sections 312 and 313 of the Communications Act 2003 and modified by the Community Radio Order 2004

² Ofcom may approve a change under any of criteria (b), (c), (d) and (e) without consultation, or after a consultation of less than 28 days, if Ofcom considers that to hold a consultation at all, or for 28 days or more, would result in a delay that would be likely to prejudice the interests of the licensee. Ofcom may also remove for the purposes of consultation any confidential information submitted by the licensee.

the facilities used for the provision of the service and for training in the use of those facilities?	
No. Reducing the number of hours will actually improve the accessibility and training as we will be able to train more volunteers should they want. We are not ruling out a return to 18 hours programming in the future	
(e) Do you consider that the proposed changes would be prejudicial to the delivery of social gain resulting from the provision of the service provided under your licence?	YES/NO please explain why below
No. We consider this will actually improve our social gain commitments as the concentration of effort into less hours will make the overall programming of a far higher quality	

Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.

In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom's published guidance on changes to key commitments

https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf

We have surveyed our audience who strongly support the proposed changes.

The request was AGREED, because Ofcom was satisfied in relation to Section 106(1A)(a) of the Broadcasting Act 1990 (modified by the Community Radio Order 2004, and further modified by the Community Radio (Amendment) Order 2010) - that the departure would not substantially alter the character of the service - and also because Ofcom considered that there were no reasons to refuse the request under its published policy criteria. As the commitment to provide original and locally produced output remains, even if the minimum daily requirement for original output is lower than it has been previously, the extent of the impact of the change on the character of service was judged to be low.