

Ujima Radio

Request to change Key Commitments

CONSULTATION:

Publication Date: 20 January 2023

Closing Date for Responses: 17 February 2023

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1. Overview

A community radio station's Key Commitments set out the type of broadcast output it is required to deliver, and form a part of its licence. Key Commitments include a description of the community to be served; a summary of the character of the service; a description of the programme service; social gain objectives; access and participation arrangements; and mechanisms to ensure accountability to the target community. When a request to change Key Commitments constitutes a significant departure from the character of service, the request is subject to consultation. This document outlines the request received from Ujima Radio CIC (or "the Licensee"), and Ofcom's preliminary view on the request.

What we are proposing - in brief

Ofcom is considering the Key Commitments change request submitted by Ujima Radio CIC, which holds a community radio licence for the St. Paul's and Easton areas of Bristol, broadcasting as 'Ujima Radio'.

The Licensee wishes to make the following changes:

- To amend Ujima Radio's community to be served and character of service from a station that serves "people in the St Paul's and Easton areas of Bristol" which "informs represents, educates, entertains, communicates and celebrates culture, heritage and diversity within the local BME communities" to a station that is "predominantly for people of African and Caribbean heritage in the St Paul's and Easton areas of Bristol" which "informs represents, educates, entertains, communicates and celebrates culture, heritage and diversity within the local African/Caribbean communities."
- To add a requirement that the station's speech content should be "of local importance to our communities of interest."
- To remove the current requirement that, over the course of a week, two non-English languages must be broadcast. (This would be replaced by a commitment that "the output is broadcast in English, and sometimes other languages of African heritage.")

We have taken a preliminary view on the request and are minded to allow the Key Commitments changes requested by the Licensee. However, we are seeking views on the request before we make a final decision. The consultation closes at **5pm** on **17 February 2023**.

2. Details and background information

- 2.1 The licence for each community radio service contains 'Key Commitments' which describe the type of programme service the licensee is required to provide.
- 2.2 Ofcom has received a Key Commitments change request from Ujima Radio CIC ('Ujima Radio'), which holds a community radio licence for the St. Paul's and Easton areas of Bristol, with regards to its service 'Ujima Radio'.

Ujima Radio's licence

- 2.3 The station commenced broadcasting in July 2008.
- 2.4 The current Key Commitments are appended to this document as Annex 6. They can also be viewed on the Ofcom website here.
- 2.5 Ujima Radio has requested three changes, and a copy of its Key Commitments change request form is appended to this document as Annex 5.

Statutory framework and considerations

- 2.6 Community radio services are licensed under the terms of three related pieces of legislation. In particular, the Community Radio Order 2004 (the "Order") applies modified versions of the provisions of the Communications Act 2003 (the "2003 Act") and Broadcasting Act 1990 (the "1990 Act") to community radio. The legislation sets out requirements that must be met for radio services to qualify as 'community radio services', including that such services are not profit-distributing, are provided for a target community, deliver social gain objectives, invite access and participation in the service, and are accountable to the target community.
- 2.7 Section 106(1) of the 1990 Act (as modified by the Order) requires that community radio licences include such conditions as appear to Ofcom to be appropriate for securing that the character of the licensed service (as proposed by the licence holder when making its application) is maintained during the period for which the licence is in force.
- 2.8 The way section 106(1) applies in practice is that, when a prospective licence holder applies for a community radio licence, it must set out its proposals as to the character of the service it intends to provide. Those proposals are summarised in what is known as a 'Key Commitments' document, which then forms the basis for the terms and conditions contained in the licence regarding the 'character of the service' and its delivery. Such terms and conditions are agreed with each licensee before the station starts broadcasting. (The 'licensee' is the organisation which holds the community radio licence.)
- 2.9 The Key Commitments document includes:
 - a description of the community to be served;
 - a summary of the character of service (a short description of the station's aims);

- a description of the programme service;
- social gain objectives (including how the station will satisfy the mandatory social gain requirements set out in the legislation, and any other social gain objectives of the service);
- · access and participation arrangements; and
- mechanisms to ensure accountability to the target community.
- In determining the licence conditions that should be included in a licence under section 106(1) of the 1990 Act, section 106(1A) provides that Ofcom may, in particular, include conditions that enable it to consent to a "departure from the character of a licensed service" (or, in other words, the Key Commitments) should a licence holder subsequently request such a change. This is embodied in condition 2(5) of each community radio licence, allowing Ofcom to consent to changes in Key Commitments. Before Ofcom can give its consent it must be satisfied that one of a number of statutory criteria has been fulfilled (see below). However, the legislation also gives Ofcom discretion not to consent to a proposed change, even if one of these criteria is satisfied.
- 2.11 The statutory criteria that Ofcom must apply when considering requests to change Key Commitments are set out in Section 106(1A) of the 1990 Act (as modified by the Order), and are as follows:
 - that the departure would not substantially alter the character of the service (section 106(1A)(a));
 - that the departure would not narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community (section 106(1A)(b));
 - that, there is evidence that, among persons comprising that community, there is a significant demand for, or significant support for, the change that would result from the departure (section 106(1A)(d));
 - that the departure would not be prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities (section 106(1A)(e)); or
 - that the departure would not be prejudicial to the delivery of social gain resulting from the provision of the service provided under that licence (section 106(1A)(f)).
- Where Ofcom is considering whether or not to consent to a proposed change on the basis of sections 106(1A)(b), (d), (e) or (f) above, it is under a general obligation to consult with those who, in its opinion, are likely to be affected by the change. Ofcom is not, however, required to consult when it is satisfied that a proposed change satisfies section 106(1A)(a) i.e. that a proposed change would "not substantially alter the character of the service". The term 'character of the service' is not defined in the legislation. We consider that it includes everything that is set out in each service's Key Commitments section of its licence. For the avoidance of doubt, this goes beyond a sub-section in the Key Commitments document

- entitled 'description of character of service' to encompass the entirety of the Key Commitments annex to the licence.
- 2.13 The legislation leaves the decision as to whether to permit a change, even if one of the above criteria is satisfied, to Ofcom's discretion. There may be reasons (depending on the circumstances of the case) why Ofcom may not consent to the proposed change, notwithstanding that one of the statutory criteria is met. We have published criteria we use to help us judge whether a request of this kind should be approved.¹ We also take account of our general statutory duties, including:
 - a) our principal duty to further the interests of citizens and consumers;
 - b) our duty to secure the availability throughout the UK of a wide range of television and radio services which (taken as a whole) are both of high quality and calculated to appeal to a variety of tastes and interests (including specifically a range and diversity of local radio services), as well as the maintenance of a sufficient plurality of providers of different services; and
 - c) our duty to have regard to the different interests of persons in the different parts of the UK, of the different ethnic communities within it and of persons living in rural and in urban areas.
- 2.14 Where we consult, we will usually do so by publishing a consultation document on our website. We will usually include in that document a preliminary view about the request. That is not a decision, but a provisional view, subject to the consultation process, so that those who wish to respond to the consultation can do so on an informed basis. We then consider all the responses to the consultation and make our decision on the request.

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¹ Guidance on changes to key commitments (ofcom.org.uk)

3. Consideration of the request and Preliminary View

- 3.1 Annex 5 contains Ujima Radio's Key Commitments change request. Ujima Radio wishes to change its published Key Commitments as follows:
 - To amend Ujima Radio's community to be served and character of service from a station that serves "people in the St Paul's and Easton areas of Bristol" which "informs represents, educates, entertains, communicates and celebrates culture, heritage and diversity within the local BME communities" to a station that is "predominantly for people of African and Caribbean heritage in the St Paul's and Easton areas of Bristol" which "informs represents, educates, entertains, communicates and celebrates culture, heritage and diversity within the local African/Caribbean communities."
 - To add a requirement that the station's speech content should be "of local importance to our communities of interest."
 - To remove the current requirement that, over the course of a week, two non-English languages must be broadcast. (This would be replaced by a commitment that "the output is broadcast in English, and sometimes other languages of African heritage.")
- 3.2 The request has been made on the basis the change would satisfy all five of the statutory criteria in section 106(1A) of the 1990 Act, and that it is consistent with Ofcom's generally applied policy criteria for such requests. Ujima Radio's full rationale is contained in its Key Commitment change request in Annex 5.
- 3.1 We disagree, on the basis that the proposed changes, taken together, would substantially alter the character of service as set out in Ujima Radio's licence. This is because the station would be changing its target community from the population of St. Paul's and Easton, with a specific focus on catering for "the local BME communities", to a station that is designed "predominantly for people of African and Caribbean heritage" in St. Paul's and Easton.
- 3.2 As we are not satisfied in relation to section 106(1A)(a), we are seeking views on this request.

Ofcom's preliminary view

- 3.3 We consider that the changes, while being substantial, would not narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community (section 106(1A)(b)).
- 3.4 On the face of it, the Licensee's request to focus the station's output predominantly on the interests and needs of the local African/Caribbean communities could narrow the range of programming available to the wider range of BME communities in St. Paul's and Easton.
- 3.5 However, there is another analogue community radio station broadcasting to central Bristol, BCfm, whose coverage area includes St. Paul's and Easton, and whose Key Commitments require it to be "for the people of Bristol including children, young adults, older people, disabled people and ethnic minorities in the area".

- 3.6 We also recognise that, since its launch in 2008, Ujima Radio has been particularly associated with providing music and speech programming for the local Afro-Caribbean community. This is not inappropriate given the relatively high percentage of the population of St. Paul's and Easton areas who are of Afro-Caribbean heritage. We have also not seen any evidence which might suggest that the narrowing of Ujima Radio's target community would in fact narrow the range of programming available to people in the St. Paul's and Easton areas of Bristol who are not of African or Caribbean heritage.
- 3.7 For these reasons, we are satisfied, on a preliminary basis (that is, before we have been able to take account of any consultation responses), in relation to statutory criterion (b).
- 3.8 As we are satisfied, on a preliminary basis, in relation to one of the statutory criteria, we have also considered whether, again on a preliminary basis, we would be willing to approve the request, having regard to our published policy criteria.
- 3.9 With respect to the proposed changes conflicting with 'characteristics of service' set out in legislation, we consider that the changes would not run counter to the legislation, as the station would still be not-for-profit and provide community benefits to the area it serves (i.e. St. Paul's and Easton).
- 3.10 We also consider that, given Ujima Radio's history of providing programming for the Afro-Caribbean community, the extent of the impact of the change on the station's overall sound would, in practice, be likely to be very limited. For similar reasons, we also feel that this would be true of the delivery of off-air activity such as social gain objectives.
- 3.11 Finally, we have taken account of the station's rationale for the requested changes, and in particular the changing audio and media environment in which Ujima Radio now operates. Given recent developments such as the launch of the Bristol small-scale DAB multiplexes that will enable more local radio stations to broadcast to Bristol, we think it is reasonable for the station to want to define its target community more precisely.
- 3.12 In light of the above, Ofcom's preliminary view is that at least one of the statutory criteria is met, and we are also satisfied with regard to our policy criteria. We are therefore currently minded to consent to the requested change to the Licensee's Key Commitments. However, we will pay close attention to any views of the station's current target community expressed in response to this consultation, as well as to the views of any other respondents.

A1. Responding to this consultation

How to respond

- A1.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 17 February 2023.
- A1.2 You can <u>download a response form</u> from the Ofcom website. You can return this by email or post to the address provided in the response form.
- A1.3 If your response is a large file, or has supporting charts, tables or other data, please email it to broadcast.licensing@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet.
- A1.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:

Broadcast Licensing
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

- A1.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
 - Send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files. Or
 - Upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A1.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A1.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt if your response is submitted via the online web form, but not otherwise.
- A1.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A1.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 4. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A1.10 If you want to discuss the issues and questions raised in this consultation, please contact Jon Heasman via email on jon.heasman@ofcom.org.uk.

Confidentiality

- A1.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish all responses on the Ofcom website as soon as we receive them.
- A1.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A1.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A1.14 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

- A1.15 Following this consultation period, Ofcom plans to publish a statement in March 2023.
- A1.16 If you wish, you can <u>register to receive mail updates</u> alerting you to new Ofcom publications.

Ofcom's consultation processes

- A1.17 Of com aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 2.
- A1.18 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.19 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

Email: corporationsecretary@ofcom.org.uk

A2. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

A2.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

- A2.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A2.3 We will make the consultation document as short and simple as possible, with a summary of no more than two pages. We will try to make it as easy as possible for people to give us a written response. If the consultation is complicated, we may provide a short Plain English / Cymraeg Clir guide, to help smaller organisations or individuals who would not otherwise be able to spare the time to share their views.
- A2.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A2.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A2.6 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

A2.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A3. Consultation coversheet

BASIC DETAILS

Consultation title: Ujima Radio - request	to change Key Commitments				
To: Broadcast Licensing team					
Name of respondent:					
Representing (self or organisation/s):					
Address (if not received by email):					
CONFIDENTIALITY	CONFIDENTIALITY				
Please tick below what part of your resp	onse you consider is confidential, giving your reasons why				
Nothing					
Name/contact details/job title					
Whole response					
Organisation					
Part of the response					
If there is no separate annex, which part	s?				
still publish a reference to the contents of	name or your organisation not to be published, can Ofcom of your response (including, for any confidential parts, a the specific information or enable you to be identified)?				
DECLARATION					
that Ofcom can publish. However, in sup publish all responses, including those wh	ied with this cover sheet is a formal consultation response oplying this response, I understand that Ofcom may need to nich are marked as confidential, in order to meet legal y email, Ofcom can disregard any standard e-mail text about ments.				
•	ceipt. If your response is non-confidential (in whole or in a your response only once the consultation has ended,				
Name	Signed (if hard copy)				

A4. Consultation question

Question 1: Should Ofcom consent to Ujima Radio CIC making the change it proposes to the Key Commitments of Ujima Radio, with particular regard to the statutory criteria set out in Section 1 of this consultation document? (Section 106 (1A) of the 1990 Broadcasting Act, as modified by the Community Radio Order 2004).

A5. Key Commitments change request from Ujima Radio

Community radio station name:	Ujima Radio
Licence number:	CR000116BA
Licensee (company name):	Ujima Radio CIC
Contact name:	Kevin Philemon
Date of request:	6th December 2022

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.

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
Description of character of service: Ujima Radio is for people in the St Paul's and Easton areas of Bristol. It informs, represents, educates, entertains, communicates and celebrates culture, heritage and diversity within the local BME communities, and generates strong community support and participation. It provides an accessible range of programmes and equips individuals and local groups with the skills to create programme content for the station and its website.	Description of character of service: Ujima Radio is predominantly for people of African and Caribbean heritage* living in the St Paul's and Easton areas of Bristol. It informs, represents, educates, entertains, communicates and celebrates culture, heritage and diversity within the local African/Caribbean communities, and generates strong community support and participation. It provides an accessible range of programmes and equips individuals and local groups with the skills to Create, Produce and Broadcast programme content. *People of African or Caribbean Heritage may also identify as having African heritage, Nigerian, Congolese, Somalian etc or Caribbean, Jamaican, Barbadian, Afro Brazilian/Columbian. West Indian, African American, Black or Black British. They share a common African heritage but have diversity of nationality, cultures, languages and religions, all of which we aim to profile within the station programming.	To be more specific Ujima radio's target groups with our community who are now spread across Bristol wide. Majority of people also access Ujima's output via the digital platform and online.

Speech. The main types of speech output broadcast over the course of each week are: community information, topics affecting local residents, chat shows, interviews, discussions, and entertainment news.	Speech. The main types of speech output broadcast over the course of each week are: community information, topics affecting local residents, chat shows, interviews, discussions, and entertainment news of local importance to our communities of interest.	To be more specific on sources of news content.
Over the course of each week the output is broadcast in English, and at least two other languages.	Over the course of each week the output is broadcast in English, and sometimes other languages of African heritage.	To be more specific on origins of languages to be spoken.

Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified²) 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.³ 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?	NO (Please explain why below)
NO. The service and output will remain the same.	
(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?	NO (Please explain why below)
NO. The proposed changes will not narrow the range of programmes offered to the community by Ujima	

NO. The proposed changes will not narrow the range of programmes offered to the community by Ujima radio, but will only make what we've been doing since launch more clearer. The programme makers and volunteers will remain the same.

Currently the BME community are very well catered for generally, not just by Ujima radio but also by sister station BCFM who are located less than a mile from us and also caters for the BME community including

² As amended by sections 312 and 313 of the Communications Act 2003 and modified by the Community Radio Order 2004.

³ 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.

children, young adults, older people, disabled people and ethnic minorities in the area. We have continued to maintain a very good partnership with BCFM. Therefore, removing the wider BME obligations from Ujima's 'character of service' would not narrow the range of programmes available to listeners on analogue local and community radio in the area.

(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 (Please explain why below)

YES. There's support from the community because there's has been questions raised about more definition of our target audience as they felt that the key commitments were not clear or specific enough about the target group.

(d) Do you consider that your proposed changes would be prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities?

NO (Please explain why below)

NO. The proposed changes will not change or restrict access to members of the community or impact access to training facilities that we offer. It will even encourage more groups to get involved as the previous key commitments was not detailed enough.

ıl NO

(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?

(Please explain why below)

NO. Regardless of the changes of the proposed changes, Ujima Radio will continue to open its doors to members of the BME community around St Paul's and Easton. Training, proposed changes will not impact or discriminate to the delivery of social gain resulting from the provision of the service provided under out licence.

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 <u>published</u> <u>guidance on changes to Key Commitments</u>

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

n/a

A6. Ujima Radio current Key Commitments

Licence number: CR000116BA

Service name	Ujima Radio
Licence area	Bristol (as shown in the licensed coverage area map)
Frequency	98.0 MHz

Description of character of service

Ujima Radio is for people in the St Paul's and Easton areas of Bristol. It informs, represents, educates, entertains, communicates and celebrates culture, heritage and diversity within the local BME communities, and generates strong community support and participation. It provides an accessible range of programmes and equips individuals and local groups with the skills to create programme content for the station and its website.

The service broadcasts:

- Music. The main types of music broadcast over the course of each week are: African and Caribbean genres (comprising over half of the music output). Music of Black Origin produced in the UK will also feature.
- Speech. The main types of speech output broadcast over the course of each week are: community information, topics affecting local residents, chat shows, interviews, discussions, and entertainment news.
- Over the course of each week the output is broadcast in English, and at least two other languages.
- The service provides original output⁴ for a minimum of 15 hours per day.
- The service provides locally-produced output⁵ for a minimum of 13 hours per day.

The studio is located within the licensed coverage area.

⁴ Original output is output that is first produced for and transmitted by the service, and excludes output that was transmitted elsewhere before. Original output can be live or voice-tracked. Repeat broadcasts of original output do not count towards the minimum requirement.

⁵ Locally-produced output is any output made and broadcast from within the service's licensed coverage area. It may include all types of local production.

Cross Counties Radio request to change Key Commitments

The service provides a range of community benefits (social gain objectives mandated by statute) for the target community, both on-air and off-air, and in doing so, achieves the following objectives:

- the facilitation of discussion and the expression of opinion,
- the provision (whether by means of programmes included in the service or otherwise) of education or training to individuals not employed by the person providing the service, and
- the better understanding of the particular community and the strengthening of links within it.

Members of the target community contribute to the operation and management of the service.

The service has mechanisms in place to ensure it is accountable to its target community.

[June 2008. Revised August 2013; November 2016]

A7. Other commercial and community radio stations broadcasting to central Bristol

Analogue commercial radio stations

Greatest Hits Radio (Bristol)

Heart (Bristol and Bath)

Hits Radio (Bristol)

Kiss (Severn Estuary)

Analogue community radio stations

BCfm (Bristol)