

Ms Mary Dowson for Bradford Community Broadcasting

Additional comments:

I'm concerned that this revision in the regulation of community radio is moving more towards how commercial radio is regulated. It does not reflect the uniqueness of a community radio station, delivering a service specifically designed by and for the community that it serves. Although there could be some measurable objectives that can be quantified to enable comparison between stations, the qualitative reporting aspects of a community radio station are vital. Just how a community radio station serves its community will be very different from one station to another.. There is a real story to be told by each station and this qualitative element must remain in the design of the reporting.

Question 1: Do you agree with the proposal to revise Key Commitments as set out in this consultation? Please explain the reasons for your view.:

No.I believe that key commitments should continue to contain specific details of how social gain will be delivered. This should be a specific section, with a level of detail on how this will be achieved.The proposed example of how the new key commitments might look dilutes this to a degree where its importance is negligible.

The distinguishing feature of a community radio station is social gain. The community radio legislation which established a third sector of radio, was specifically brought in to enable the airwaves to be used for social gain. If this is diluted in any way then there is a real danger that there will be little to distinguish the operation of a community radio from a commercial radio. Its vital that social gain lies right at the heart of community radio and this therefore must be specifically reflected in the key commitments of a licence holder.

I do agree with the premise that it should be easier for Community radio stations to have some flexibility in just how they deliver their key commitments. over the course of a 5 year licence period. Its true that as a station develops and responds to its community, it may well find more appropriate ways to deliver its agreed social gain objectives. Any change in how they deliver the stated social gain objectives could be proposed, possibly with their annual report , and then negotiated/agreed directly with OFCOM. But it should be clearly be a change in HOW they are delivered in order to to achieve the same objectives, not a dilution/removal of the social gain obligations themselves.

Clearly a licence application itself could well contain statements of great intention - and a licence could be granted on that basis. If the subsequent key commitments document doesn't reflect those intentions, and just has the proposed vague outline of community benefits, then there will be much harder to call the station to account for non delivery.