

The Community Media Association (CMA) is the representative body for the community media sector in the UK. We support and represent community-based radio stations, local and community TV operators, and community-based Internet groups. The CMA has been instrumental in the development and recognition of the community radio sector and we represent the needs and interests of full-time community radio licensed stations and aspiring stations.

We are inspired by a vision of a society that understands and appreciates the value of community media. We believe all people should have access to community media, both as audiences and practitioners. We want to see community media that is consistently relevant, diverse and offering participatory opportunities for as many people as possible.

We welcome this opportunity to expand access to restricted service licence broadcasting which, we envisage, will enable many more people to access broadcasting opportunities in supportive community environments, leading to improvements in democratic engagement, media literacy, and social cohesion.

The proposed changes to Ofcom's policy are unlikely to impact negatively on the range and variety of broadcast radio services available to audiences or on current users of radio spectrum. On the contrary, Ofcom's proposed amendments are likely to promote the optimal use of broadcast spectrum and enhance the provision of a wider range of services for listeners.

A key trend that we believe should influence regulation is that community media has grown and is now more widely understood than ever. The proposed amendments to Ofcom's policy on licensing short-term restricted service licences (SRSLs) are likely to increase the number of opportunities to participate in radio broadcasting and we expect to see an increase in SRSLs granted as stations previously excluded from broadcasting are permitted access to broadcast spectrum.

SRSLs provide a reduced-risk path to access radio broadcasting for smaller short-term radio projects for which commitment to longer full-time broadcasting is not viable or otherwise possible.

We expect that this revision of Ofcom's policy on short-term restricted service licensed radio broadcasts will lead to an increase in the number of communityrelevant broadcasting projects, some of which will have a niche focus such on the arts, heritage, education, and minority languages. Additional expected benefits might include, but are not limited to, an increase in media literacy, improved local democracy, greater local news coverage, and an increase in radio listening in general

Question 1: Do you agree that Ofcom should cease to apply the policy to not grant the same applicant more than two SRSLs in a single year, or one SRSL if the service is within the M25?

The Community Media Association agrees with the proposal that Ofcom should cease to apply the policy to not grant the same applicant more than two SRSLs in a single year, or one SRSL if the service is within the M25.

The Community Media Association does not consider that this change is likely to impact negatively on the range and variety of services available to audiences or on any current users of radio spectrum. We consider that this measure is likely to facilitate the optimal use of broadcast spectrum and the provision of a wider range of services for listeners.

Question 2: Do you agree that Ofcom should cease to apply the policy to not grant SRSLs where the service proposed to be provided does not appear to be different from what is available on the commercial and community services in the area of broadcast?

The Community Media Association agrees with the policy change that Ofcom should cease to apply the policy to not grant SRSLs where the service proposed to be provided does not appear to be different from what is available on the commercial and community services in the area of broadcast.

We expect that the consequence of this could lead to an increase in the diversity of short-term restricted service licensed stations broadcasting content that is complimentary to existing community and commercial radio stations and therefore broadening listener choice.

Overall, this measure is likely to have no impact on or will be beneficial to audiences, particularly Muslim audiences, as more community-relevant stations will be available to listeners and those wishing to make radio broadcasts.

It is acknowledged that there is the possibility of SRSL stations competing for advertising revenues during their period of broadcast. However, SRSLs are by definition short-term and permanent stations have the advantage of offering a full-time broadcast ploatform. In general, increased interest and listening to radio is likely to lead to increased audiences for all broadcasters.