

Sean Og Mac Braoin for UIR FM

IUR-fm Limited -Response to Consultation.

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

Answer: Given the administrative burdens and costs bourn by community radio stations, we would support appropriate proposals which would serve to reduce that. We note the huge changes to commercial radio licences dramatically reducing their obligations to meet the needs of their shareholders. In this context we do not see why community radio stations should be second class citizens who have unreasonable administrative burden.

Accordingly we believe that any changes to existing Key Commitments must be agreed with licensees and increase the quantifiable targets contained in commitments so that their attainment can be fairly and unambiguously judged against specific quantifiable targets.

We oppose any changes to Key Commitment which would lead to increased subjectivity or interpretation by persons who are not members of the community for which the station is established to serve.

Increased quantifiable targets within Key Commitments will reduce complaints by the community and simplify Ofcom's regulatory work as whether or not a station is fulfilling its obligations will be a 'black & white' issue and will eliminate any confusion, subjectivity or disagreement.

This position does not inhibit a station from achieving beyond these targets but helps establish a minimum threshold for stations which they must achieve to be compliant with their licence before expanding their activities to other additional areas of social gain.

Such an approach would:

1. meet Ofcom's objective of reducing their regulatory & investigative burden
2. reduce burden on stations and mean that they know exactly the minimum threshold they must achieve every year
3. increase transparency for the general public by which they will be able to access if their station is definitively achieving their obligations.

We strongly oppose any changes to Key Commitments which would introduce or increase confusion, subjectivity or interpretation.