

**Name and title under which you would like this response to appear:**

Chris Pearson, Station Manager, BFBS Lisburn

**Representing:**

BFBS Radio

**What are your comments on these proposals?:**

6.10\*: It would be possible to take into account volunteer time when assessing the turnover of a community radio service. Ofcom welcomes views on this issue and on how the value of such input could be calculated.

I agree with this proposal. CMA's figures for estimating the value of such volunteer time would probably be a good starting point.

6.12\* The current rule requiring that no body corporate may hold more than one community radio licence should be reconsidered.

I strongly agree with this proposal.

In the case of BFBS Radio in Northern Ireland, we have a community of interest audience, which is spread geographically over 5 military bases within a 35-mile circle. Some of these bases are located in extremely sparsely populated rural communities.

This audience consists of no more than 5,000 military personnel plus their dependants and associated civilian workers on the bases. Think of it as five small villages spread across a 35-mile area but all with one common interest - they are all involved with the wider military community.

BFBS has been providing bespoke programmes for all three services as the forces broadcaster for 64 years. We have operated in Northern Ireland (via LPAM broadcasts, DTH systems and induction loops) since 1995.

To serve this relatively small number of people effectively with FM Community radio, involves the establishment of a number of limited by guarantee companies, each with their own board of military directors, requiring Directors Liability insurance and so on.

This has added an extra layer of unnecessary and time-consuming paperwork to the licensing process.

I fully understand and support the concept that community radio needs protecting from possibility of being 'gobbled up' by larger commercial network groups, but feel that there can be exceptions to many hard rules, which should therefore be considered on a case-by-case basis.

The intention of community radio for the military in Northern Ireland is to bring together several geographically dispersed (though only over a relatively small area), communities of interest. This aim is coupled as was always the plan, with the establishment of local studios in each location and the provision of training by BFBS staff (as we have done for the past 60 odd years in locations as diverse as Belize, Germany, Cyprus and even Iraq) to members of the military, dependants and local

civilians (as has already happened in Lisburn).

These aims were not helped in anyway by the prohibitive and unnecessary burden of the legislative ownership plurality rule.