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Representing: BRFM Kent

### **Proposal 3**

While we do not currently propose that a date should be set for the switch-off of analogue (FM and AM) radio, we should aim to maximise flexibility in the licensing system so as to be able to free-up that spectrum for other uses, when the time is right.

reply- we believe that the current fm analogue should be used for other services such as creating more community radio services in the uk or making suure community services can switch over to drm

### **Community radio licensing and regulation**

#### **Proposal 6**

.1\*: The characteristics of community radio services, as included in the Community Radio Order 2004, should be retained, but the definition of "social gain" should be reconsidered

reply- we agree we have always felt that community benefit is a better way to describe the service

.9\*: It is important for a community radio station not to receive all of its funding from a single non-commercial source. However, it may be that there is a case for increasing or removing the current maximum percentage limit on funding from a single non-commercial source. Ofcom welcomes views as to what the appropriate limit should be.

reply

we believe that the funding issue with the current legislation is a juggling act and we agree with ofcom that community sector has the tightest rules  
we also believe that this security protection for commercial services is not realy correct as most commercial stations we have come in contact with have not felt we are on there terriority and have helped in workshops etc to support a commuinity service. We know other areas where a commerical station is operating and community stations cant take any advertising. We feel that community stations should be able to fund there stations from advertising and surely it is the output the key commitments and the social gain that is a key element of the service we provide. and community radio struggles because it never knows where its next penny is coming from and when it does it musnt go over the 50 per cent rule. We would encourage ofcom to look into this rule and how it can be developed after all as already pointed out by ofcom there other areas that are not under such scrunity.

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

we agree and it could mean joint funding bids

6.14\*:Community radio licences should be eligible to be extended for up to a further five-year period, subject to meeting specified requirements, on one occasion only. The period of extension for some licences may be less than five years, should that be necessary to achieve a common end-date for all analogue radio services.

we agree this should be the case and if a community station has fulfilled its commitments and has done well there should be an extension facility.

6.16: The coverage of community radio services will still be restricted by frequency availability constraints, and Ofcom will continue to need to weigh up the relative merits of alternative licensees, for example where it might be possible to licence two small stations or only a single larger service, when deciding on the best use of the available spectrum resources.

we have always felt this--- we are on an island but try to bring in the rest of the borough who feel neglected plus some of our school children who live on the island go to school else where off ther island we have always tried to bring in the rest of the borough and feel that ofcom should license stations small or 1 bigger for an area that can benefit the whole of the community.