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What are your comments on these proposals?

Re Proposal 6.9

I raised this matter with Will Jackson during the ongoing round of considering CR applications from Scotland. The current restriction prevents a station from receiving 75% of operating costs from, say, Big Lottery Scotland's Growing Community Assets Fund which is prepared to fund revenue costs to this level. The rule would seem to be designed to prevent any commercial pressure on a station's output. Such a situation would not arise with a non-commercial funding body. The rule is potentially damaging to the initial sustainability of a station serving an area with a small population and with a small business base, as is the case with the area we have applied to serve. Moreover, stations issued with a licence restricting them from raising revenue from spot advertising and sponsorship might, in certain circumstances, be unable to operate with this additional restriction. I would suggest that a pragmatic revision would simply be to raise the percentage of income accepted from a single source may be up to 75% provided that the source is non-commercial. As you suggest, an alternative would be simply to remove the entire restriction.

Re proposal 6.10:

There could be a value in allowing the inclusion of costed volunteer contributions - which are of significant worth. Differentiating between volunteer management and volunteer presenters in the calculation of value, as

suggested, would be fair. However, as the report stands, there is a confusing variation in the financial terms used - 'cost of operating the service' (6.100); 'operational income' (6.104); and 'turnover' (6.106, 6.109 & Proposal 6.10). This creates a sense of insecurity in those wrestling to develop a clear and secure grasp of what is permissible and what is prohibited.

Re Proposal 6.14:

Until I read this report, we had not been aware that CR licences are awarded without provision for renewal - and it is quite alarming. This fact must be recorded somewhere but, having combed virtually the entire Ofcom website in the process of preparing Radio Fyneside's application, it was not a prominent piece of information. Elsewhere the report rightly expresses a concern with the value of 'hobby' stations. This particular situation can encourage nothing else. Any station with a serious intent and a substantial commitment to providing a service of real community benefit will inevitably be involved in fund-raising to support the level of investment needed to deliver Ofcom's requirements in a meaningful fashion. It is hard to understand how this could be envisaged as a reasonable investment for a five year lifetime. Equally, stations will only be coming to maturity at the end of a five year period. The current lack of provision for licence renewal is indefensibly wasteful of that achievement. Again it is hard to see how the delivery of any real community

gain is possible within this situation.

Proposal 6.15:

The removal of the current restrictions on economic impact in the licensing procedure would be the simplest and fairest way of letting stations find their level of sustainability and work to earn the level of community support that will underwrite that sustainability.

Proposal 6.16:

From our perspective - in a remote area with a plethora of small dispersed communities in a very awkward topography with poor transport, coverage - and power (not discussed in the report) are very real issues. Coverage restrictions via available frequencies have the capacity to cut to an unsustainable situation - in areas where radio is the only fully capable carrier of information to all of the residents of such communities. Rural communities have few other resources, as opposed to urban communities where other sources of information come much more easily to hand. The suggestion of awarding two two small-coverage licenses as opposed to one larger one would obstruct attempts - such as ours - to use community radio as a means to bring several dispersed communities into a single community of interest.