

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

Doug Cresswell, Chief Executive Pure 107.8FM

**Representing:**

Pure Innovations

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

6.1

We agree that social gain should be reconsidered and would be interested in further discussion on the idea of 'community benefit'.

Pure 107.8FM has been founded on the principle that if very few people are listening to the station then it is actually providing little benefit to the target community no matter what valuable programming it is broadcasting or how many people are being given access to the airwaves.

We welcome the idea that community radio licence applicants will not need to 'tick every box' when outlining their social gain objectives and instead be given more freedom to explain how their proposal will benefit the target community.

6.2

Whilst we welcome any more which would lessen the regulatory burden on community radio applicants, there is a slight concern over this issue. If applicants for future licences only have to show they can sustain the service for one year, this might disadvantage groups with a proven track record of running a sustained community radio station. We feel that applicants should carry more weight with Ofcom if they are already running a successful community radio station if rules change to allow them to hold more than one licence.

6.3

We agree with Ofcom and would welcome a change in this area.

6.4

We agree with Ofcom and would like the regulator to go further in this area. It should not just reconsider this policy for new applicants but also adopt this policy for community stations currently broadcasting.

Since it launched in September 2006, Pure 107.8FM has been limited in the music it may play. Specifically the station was asked to come up with an alternative music policy when applying for a community radio licence that did not include pop. This was because an ILR commercial station in Stockport played pop in its output and Ofcom was keen to provide a broader service in the area.

We continue to feel that this is weakening our popularity amongst listeners, who often request songs that we are simply not allowed to play. Pure 107.8FM provides listeners with a broader service through its Stockport focused news, sport, features, specialist music shows and community programming - none of which are provided by

the commercial radio station based in Stockport.

However, whilst they were permitted to take news from a 'hub' in Bolton and network programming we are still not allowed to broaden our music policy to take account of our listeners tastes.

6.5

We agree with Ofcom that providing evidence of the demand for a proposed service can be problematic and should be reconsidered.

6.6

As noted in 6.1 we welcome any effort by Ofcom to reduce the regulatory burden on community radio stations both in the application process and after the licence has been awarded.

We agree that social gain or providing community benefit is a fundamental part of community radio; however we would welcome more flexibility when being asked to demonstrate how the station has benefited the local community.

6.7

We agree that there is not an overwhelming need for a community radio station to be made accountable to the target community through regulation. This is because, like every media outlet, a community radio station is judged every day on its output by its target community. If the radio station is not enjoyed or appreciated then its target community will not listen. Members of the target community will not want to volunteer. The radio station will find it hard to attract either advertising or funding and will eventually be forced to close.

Through market forces any community radio station is already accountable to its target community and therefore Ofcom does not need to add regulatory burden to stations by insisting on additional ways to make the station accountable.

6.8

Whilst we feel that training is an important part of any community radio station, we agree that Ofcom should reconsider how this is regulated. Our own experience in the last two years has shown how difficult it can be to juggle a full training programme for volunteers while also running a station on-air. This experience was made more difficult through staff turnover. During this time we have continued to train volunteers to the best of our ability, however knowing how hard this has been we feel it would be unfair if Ofcom were to penalise a station harshly for struggling to meet its training commitments.

6.9

It is our strongly held view that there should be no rules or limitations on the funding of a community radio station. We have to co-exist in the real world with every other media outlet and compete with them for listeners. But when it comes to funding every other media outlet holds a distinct advantage over us, because only community radio is limited to the funding it may receive.

All Community Radio Stations must abide by the Ofcom Broadcasting Code and any

that do not should be dealt with through complaints received and found to be in breach of this code by Ofcom.

Ofcom's concerns over undue editorial influence being achieved through funding are completely unfounded as if this ever were the case the regulator could find the station in breach of its broadcasting code and remove its licence.

Finally, we have recently been unsuccessful in receiving funding through Ofcom and the Community Radio Fund. We feel that the government should be called on by Ofcom to devote more money into this fund, particularly as the number of community radio stations eligible to apply has increased. We also feel that the fact that Ofcom cannot offer financial support to community radio stations is another reason why the funding caps should be abolished.

#### 6.10

We can see issues arising should Ofcom try to get statistics to account for volunteers' time. It strikes us as similar to the way European funding worked and there is evidence that this became an audit nightmare.

If at present Ofcom feels, as we do, that there is a problem with the funding of community radio stations we believe it should address it by scrapping the system of capping funding from a single source rather than trying to work out ways of match funding that don't exist.

#### 6.11

We agree with Ofcom that there should be no changes to the categories of person prohibited from holding a community radio licence.

#### 6.12

We agree with Ofcom that a body should be able to hold more than one community radio licence. The regulator has rules in place to ensure the 'community benefit' or social gain of the proposed service, so it should not be an issue who holds the licence. In fact it may benefit a target community to have their radio station run by an organisation with experience of broadcasting another service and ensuring it was sustainable.

#### 6.13

We feel Ofcom does need to urgently review the feedback process; as the current system actually discriminates against a successful community radio station.

To give Pure 107.8FM as an example, everyday since it's launch in September 2006 the station has broadcast news, information, features and campaigns of relevance to its target community. In feeding back to Ofcom it is difficult to know what to state and what to leave out, as our programming has consistently met our key commitments. For example when asked what local groups he had worked with our journalist said he had broadcast over 1,000 local Stockport stories and to list every group was simply unrealistic.

Our volunteers have produced thousands of hours of incredible programming but to put this into some form of condensed document is an incredibly difficult job and a station that had done less work with the target community would ironically find it

easier to offer Ofcom feedback.

Pure 107.8FM's parent company and the licence holders Pure Innovations have a finance team that are professionally employed to complete end of year accounts.

Our feedback from this group is that the financial information that Ofcom requires in its annual feedback is difficult to compile, even for professionals. The reporting period for Ofcom and the radio side of the business does not lend itself to standard accountancy periods, which has caused further problems.

#### 6.14

We welcome Ofcom's suggestion that a community radio station could have their licence extended for a further five year period, but we ask the question why this may happen only once?

We believe that Ofcom is mistaken in its thinking on the speed of migration of listeners to DAB and we encourage the regulator to find a space for successful community radio stations on either DAB multiplex's or the FM frequency.

Therefore why after this first five year extension has reached its conclusion should a successful community radio station be forced to reapply for its licence in an open competition. This would create an unnecessary regulatory burden for Ofcom and ultimately could lead to a target community losing its voice.

#### 6.15

In our last response to an Ofcom consultation in 2004 we said that we considered the 50% advertising rule to be unworkable and we have not altered our opinion.

It creates an anomaly whereby a community radio station needs to match commercial income with non commercial income. But you may struggle to attract non commercial funding and to survive you will need to supplement your income through commercial advertising.

We recommend the removal on all limits of funding as it is the easiest and most honest way forward. To make changes to the funding that is allowed to be received through spot ads and that which comes through sponsorship is a fudge.

#### 6.16

Ofcom will know that the experience of Pure 107.8FM is that our coverage is very weak in certain parts of our target community. We are currently looking at an expensive relocation of our transmitter to try and improve the signal strength in all parts of our target community. This action would not be necessary if Ofcom would allow our request to increase the power of our signal and we are disappointed that this consultation does not seek to address the issue of signal strength as this is a key area holding back the growth of community radio.