

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

Trevor Lockwood

**Representing:**

Radio Fish

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

6.1 Community radio should embrace the principles of social enterprise, see <http://www.socialenterprise.org.uk/> for full definitions. This is an emerging third sector into which community radio fits perfectly. Profit is not a dirty word, and those involved in the enterprise should be free to choose where that profit will go.

6.2 and 6.3 I'd agree that the sector should not be so closely control led.

6.4 Choice could be broadened by allowing these stations to provide programmes and content both to each other, and to other stations. There needs to be a recognition that expanding broadband availability will encourage greater use of internet listening, which may not be under the close control envisaged by OfCom.

In itself that diversification will present barriers and obstacles to genuine station providers, who may see little advantage in entering the OfCom cobweb of legislation - a new form of pirate will then emerge.

6.5 Demand is a function of supply - and it is not for OfCom to make decisions, often being forced into areas where they have no expertise, or will be forced to become soothsayers predicting an uncertain future. The major ICT changes in recent years, such as Amazon, eBay and Google would never have satisfied any known business model - freedom is vital.

6.6 Social gain, in recent years, has been linked to minority groups and diversity - both of which have counter-productive influences, and do little to encourage the cohesiveness of our society. Inclusion should be the new buzz-word. Diversity has failed, indeed it has created social tensions from which we are all suffering, and we must move on towards an new era. Wit h 166 languages being spoken in one London Borough any attempt to provide f or each group will fail - but they can all become British - that's the right way forward.

6.7 Accountability is ultimately measured in support gained - radio stations need listeners, who will encourage investment, in order to survive. At present there is some inbalance as funding is skewed towards minority audiences - but these can be better served through an internet presence, leading to other platforms when demand is identified. This is a nation state whose majority must be served first: for we should all be members of that state, as participating citizens.

6.8 For community radio stations this is a vital element - and should be considered by OfCom. What training provision will each station provide t o their target audience - although a combined, distance-learning, platform must also be considered.

6.9 Majority funding from one source must be avoided - certainly no mo re than 50%, ideally no more than 25% for any one source.

6.10 Volunteer input is vital: each station has four levels: trustees (executive management), management (working managers), volunteers and listeners (who should be given the chance to become members).

For me the cooperative model works best, where each sector's input is measured in some way: timesheets, listening online time, even membership fee payments - that input is invariably much better than any simple financial arrangement and should be measured and recognised.

Britannia Building Society willingly paid Ipswich Town Football Club 754,000 last year from their community fund, yet say that community radio (including Ipswich CR) does not match their criteria - how so? They refuse to answer - but they clearly believe that advertising through a commercial football club is best. That attitude needs to be investigated - for it maybe too common amongst potential supporters of community stations.

6.12 At Fish Radio we would like to broadcast much of our content to several stations, each serving small towns and vilages in our chosen area: east Suffolk - small towns like Felixstowe, Aldeburgh, Framlingham and Woodbridge may not have sufficient enthusiasm to operate a good station themselves - by joining together the potential volunteer community becomes available .

We also envisage creating stations dealing with minority interests, drawing upon content from a large array of resources - we have moved beyond geography - what then?

so more than one licence - provided certain criteria are met.

6.13 agreed

6.14 5-year renewables - why just one renew? Such stations should have more than a 10-year life - after all the BBC has been going far longer.

6.15 We do not understand why commercial stations are treated differently - after all they are just concerned with making a profit - often for people who have no connection with the community served. Remove all restrictions: they should be able to compete - if not they can go away.

6.16 community and commercial licence applicants should go in the same pot. In Ipswich the commercial licence has been allowed to cover an area t hat could properly be covered by 5-6 community stations, and it has been given the most attractive FM bandwidth - why?