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Representing: RCT Community Radio Project

What are your comments on these proposals?:

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.

The replacement of the term 'social gain' with that of 'community benefit' is a welcome move. Many of us in the community radio sector have struggled to define adequately what 'social gain' actually means and whilst operating in the spirit of the original terminology, 'community benefit' seems a much more meaningful term which everyone can understand and relate to whether it be funders, staff, volunteers or members of the community.

The preservation of the 'not-for-profit' status of all community radio stations is essential. Ultimately this is what will ensure the sector can deliver on its aims and objectives free from the profit motive which has had such a major effect on the changing nature of commercial radio at a local level in the UK.

6.2*: The statutory criterion regarding the ability to maintain the service should be reconsidered such that Ofcom could be required to have regard to the ability of an applicant to establish and maintain its proposed service for the first year of the licence period.

This is essential. Experience to date would suggest that not enough attention has been paid by applicants to having a sound financial plan in place when applying for a licence and neither has criteria been strict enough on this when OFCOM has awarded licences previously. I agree wholeheartedly with section 6.78 – any applicant must have regard to sustainability from the outset

A robust business proposal is essential to accompany any application for a community radio licence with particular attention paid to a robust financial plan which can workably deliver the aspirations of the planned service delivery. Naturally many enthusiasts are excited by the possibility of running a community radio station but a successful sustainable one needs good financial management from the outset

As per section 6.80 this is also essential. As one of the original operators of the pilot stations I know only too well that the community radio sector is still in its infancy with many funders still not fully understanding its place within the voluntary sector or the impact it can have on a community. Its viability and sustainability in the medium to long term is key to ensuring that funders are prepared to back our projects.

Regarding section 6.81 for new applicants I would expect to see a realistic source of funding for year one with at least a robust financial strategy for the

first 3 years with a well thought out funding strategy including identified sources of funding

6.3*: The statutory criterion which requires Ofcom to have regard to the extent to which a proposed service would cater for the tastes and interests of the community to be served should be reconsidered.

Agree that these are all important aspects of the service provided and are essential in any attempts to win over public funders

6.4*: The statutory criterion which requires Ofcom to have regard to the extent to which a proposed service would broaden choice should be reconsidered.

Of course community radio should broaden choice on the airwaves. In the past there has been some criticism from commercial radio operators concerned that community radio stations would be no different but able to source grants. Some operators of community stations may have fallen into the trap of not making their service distinctive. This is a very short sighted approach in that without due regard to the 'community benefit' aspect of the service this will not help in the future in terms of seeking partners or in accessing public funding

6.5*: The statutory criterion which requires Ofcom to have regard to the extent to which there is evidence of demand, or support, for a proposed service should be reconsidered.

Anyone wanting to set up a community radio station should ensure that they have a developed awareness of their community network and are working with relevant partners to ensure there's a multi agency approach to delivering services in the community. I believe that to be a successful community radio station – as in the rest of the voluntary sector – this again is essential

6.6: The statutory criterion which requires Ofcom to have regard to the extent to which a proposed service would deliver social gain should be retained.

See 6.1 above. I believe that further work is required by OFCOM , the CMA and the existing community radio sector to have a better understanding of this

6.8*: The statutory criterion which requires Ofcom to have regard to the provisions an applicant proposes to make in order to allow for access by members of the target community to the station's facilities and for their training in the use of those facilities should be reconsidered.

This is an essential aspect of the service in terms of community benefit. It is something that is very resource intensive if carried out correctly and any

prospective community radio applicant should be aware of what is entailed in terms of time, resources and money!!

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.

For the purposes of EU funding we did just this at GTFM and volunteer time was costed to match fund and maximise the grant obtained. It was not included within our audited accounts and therefore did not over state our trading position. It is something of a double edged sword and requires rigorous time consuming systems to be put in place to monitor the hours which itself can then add to core costs through additional administrative requirements

6.11: There should be no changes to the categories of person prohibited from holding a community radio licence.

Nothing much to add here over and above the comments made in 6.7 above

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

This is one of the most important aspects of the consultation and the proposal made is to be welcomed greatly. For sustainability of the sector the ability of a local federation of stations to come together with common aims and goals and sharing central costs is the only way forward in my opinion to enable the sector to develop

It is already acknowledged by OFCOM in this consultation that some of the most onerous requirements, both in terms of actual broadcast content and 'off air' requirements of social gain/community benefit, fall onto community radio operators. Obviously this can add significantly to operating costs – a fact that is already acknowledged anyway by local commercial stations who have successfully campaigned for a relaxation in terms of 'localness' requirements.

Allowing small groups/clusters of community stations to operate in a given area with common aims and objectives – sharing costs, staffing and programming is a sensible way forward and does not in any way compromise the sector at all

Whilst at GTFM I was convinced that this approach was the only way of ensuring long term sustainability. In our area of operation (Rhondda Cynon Taff) there is an appetite for other communities to develop community radio on the back of the success I achieved at GTFM. However I know that in terms of funding available in the area it would never be the case that a series of

stations all replicating GTFM would be funded and indeed if they were initially would not be sustainable

Therefore I developed the RCT Community Radio project with Welsh Assembly/EU funding to set up community studios in 3 locations, to train local people up and to run a series of RSLs. If the model works it will provide a useful analysis of the viability of this option for future development of community radio

I should also add that in the voluntary sector this joined up approach is common place now – particularly as grant funding continues to be squeezed

In Wales the Welsh Assembly's flagship regeneration scheme is the Communities First programme which directs resources at Wales's most deprived communities. As this has matured there has been a realisation that duplicating services entirely in often neighbouring communities is wasteful of time, effort and funding so the approach now encourages communities working together. This therefore compliments this very positive approach by OFCOM

I should add that the RCT Community Radio Project will be working in 3 Communities First areas in RCT and funding has been identified in the budget to carry out a full study of what has been achieved at the end of the project (March 08)

In Wales the lobbying of Assembly Members by myself in 2006 was successful in gaining the support of the Assembly Government – to the extent that they set up a Community Radio Fund for Wales in the November 2006 budget settlement. The Assembly have therefore accepted the very real benefits of community radio as a means of community regeneration but In terms of financial support in the future I believe that they will – along with other funders – expect to see the type of model I have referred to above being developed to ensure efficiency savings are made

6.13: Ofcom needs to ensure that community radio services operate within the terms of the relevant legislation. The process of feedback has not yet begun, as no station has been on-air long enough. It is not therefore possible to assess the advantages or shortcomings of the existing system. For this reason, Ofcom is not proposing specific alterations to the level of feedback required at this time.

Agree

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.

Does this mean that it is not envisaged that the lifetime of any single community station will exceed 10 years? The notion of licence periods and lifespan of a station (as a community project) is vital in terms of business plan/financial planning

6.15*: There may be a case for removing all of the current restrictions relating to the economic impact of licensing community radio services. Ofcom will be conducting further assessment in this area, with a view to bringing forward proposals for consultation later in the year as part of our review for the Secretary of State. In the meantime we welcome views on these matters.

It is understood fully that some small local commercial stations do face financial problems. However I think that OFCOM has taken a mature attitude to the 'bigger picture' and the radio landscape as a whole (eg section 6.141). One thing I would say is that while at GTFM I positively embraced the opportunities to seek commercial funding from the outset and it was no easy task. Much is often said about community stations being able to take in advertising from small businesses who could not afford commercial radio. However the time, effort and resources needed to achieve this - and take in just a few hundred pounds from each business on average – often outweighed the financial gain. At GTFM I directed the efforts towards public sector agencies and this paid off after a lot of hard work on my part explaining the benefits. The type of campaigns that we then aired (health, recycling, adult learning ,etc) also complimented the aims and objectives of the station

Note: We believe that suggestions marked with an asterisk would require new legislation.