

The Future of Radio

Response from the Student Radio Association.

This is an exciting time for Student Radio.

In 1968, University Radio York became the UK's first legal independent radio station, today they continue to broadcast to students across the University of York campus on 1350am. In many respects, the fundamentals of student radio have not changed over this period – as a community our commitment has always been to provide targeted local content for students, whilst providing an opportunity for new talent to flourish and develop. However in terms of the way stations deliver that service, a lot has changed against a backdrop of rapidly developing broadcast technology.

For example, student radio stations were amongst the early pioneers of podcasting,

recognising and adopting it as a form of content delivery as far as a year in advance of many commercial stations.

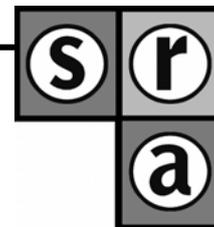
For 40 years, student radio has shown a strong resilience, finding cost-effective solutions to overcome a variety of challenges; accordingly it seems fitting that on the eve of this anniversary we are gazing into the future.

The industry need not worry, Student Radio is in a very strong position at present, and we have no intention of being left behind; the commercial sector in particular can rest assured that Student Radio will continue to provide an essential training ground for up-and-coming creative professionals.

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The Student Radio Association is a non-profit making body that works to further the interests of the Student Radio Community in the UK. Approximately three quarters of all University radio stations are members of the SRA, and they are being joined by an increasing number of college stations. We estimate that there are currently over 120 stations in the UK which meet the definition of a Student Radio Station, defined in our constitution as:

"A radio station based at, or linked to, a place or places of education. The station can be broadcasting by any means, off-air or in the process of setting up."

Our member stations currently utilise a wide variety of broadcasting platforms. At the simplest level, these include hard-wired services providing entertainment to a communal area of a college or university, for example Student's Union bars or common rooms.

Alternatively, they may undertake Ofcom licensed transmissions; taking advantage of 'Restricted Service Licenses' whether year-round long-term LPAM/FM or short term FM. Additionally, at present a handful of stations maintain induction-loop services.

Where operating costs have made it impossible for some student radio stations to broadcast traditional analogue services, stations have adopted internet streaming as an alternative. Other stations have complimented their analogue service by simulcasting on the internet. As a result, online digital broadcasting is the most common platform for student radio broadcasting today, and it is speculated that this platform takes the highest share of student radio listening; especially when live listening is combined with 'listen again' and podcasted content.

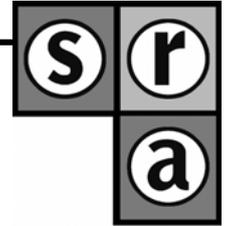
Despite this, long-term LPAM/FM services are still very widely used, with the OfCom website listing 58 student radio services currently broadcasting on them¹.

The LPAM system was introduced in 1999 after successful trials at three University sites (Lancaster, Hull and Essex) and allows all-year round free-radiating broadcast on the AM band. In remote parts of the country (North Wales, certain areas of Scotland and North-West and South-West England) where spectrum is more widely available, broadcasting on FM all-year round is allowed. Under the terms of the license, stations are restricted to only broadcasting to the campus they are based on – and there should be no recognition of any potential listeners outside of the defined site.

Feedback from stations suggests that providing a 'traditional' licensed broadcast service (whether long or short term) gives a station some degree of credibility; after all, it is now possible for almost anyone to start their own internet radio station! Further to this, we believe that analogue transmission remains the most accessible broadcast platform for student listeners, especially when on the move.

As OfCom begins to consider alternative potential uses for spectrum currently used by analogue broadcast services, we consider this an ideal opportunity to explore the long-term solutions for the ongoing security of student radio in an industry which is developing technologically at an incredible pace. As a result we have made a number of recommendations, presented on the following pages, which will feel are relevant to the current consultation.

¹ Ofcom (2007), *List of long term RSLs*, http://www.ofcom.org.uk/static/radiolicensing/rsls/longterm_rsls.htm, [accessed 15 Jun 2007]



1. That spectrum currently being used by licensed analogue radio services is preserved for as long as there are broadcasters who are unable to make the transition to digital.

The Student Radio Association notes OfCom's admission that "For small-scale commercial stations and community stations, [...] DAB does not currently offer them a transition path to digital"² We welcome this admission, however request that along with other holders of restricted service licenses, student radio is in future given consideration in this respect.

For the foreseeable future; student radio services will be prohibited from broadcasting via DAB due to the associated cost. Similarly although DRM technology is still in the very early stages of implementation, with the first UK trial barely underway; it is unlikely to offer a realistically priced solution for student and community broadcasters within the timescale currently being considered.

Whilst we note that OfCom is unable to guarantee a transition path to digital for all existing broadcasters, we strongly believe that as a result of this, they should continue to license analogue services for community and RSL broadcasters indefinitely.

2. That the terms of Long-term Restricted Service Licenses be amended, to allow stations to acknowledge listeners outside of a strictly defined site, and to allow an increase in transmission power where possible to enable student radio stations to better serve students at their institution.

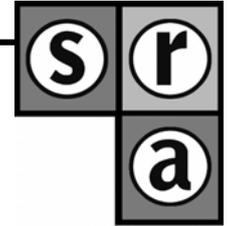
As noted in the introduction, Ofcom currently offers Long-term LPAM/FM restricted service licenses for services "provided within a clearly-defined single site occupied by an establishment such as a university, hospital, military barracks, marina or shopping center"³ While this solution is still largely applicable to hospital and garrison radio services, anecdotal evidence suggests that student accommodation is increasingly dispersed and thus poorly served by student radio services.

This change is partly due to the fairly large number of institutions which have been awarded university status within the past 10 years; often in cities already served by a 'traditional' University. A lack of available space means that these 'new' universities tend to be more spread out, and as such student accommodation is not necessarily grouped together in one big complex. Additionally, even traditional campus-based universities have run out of room to expand, and as a result it is increasingly unlikely that student accommodation will all be based on one site.

Couple this with legislation currently being considered by MPs to reduce the density of Houses of Multiple Occupation (which applies to most private-rented student properties) in University cities and

² Ofcom (2007), *The Future of Radio*

³ Ofcom (2007), *Restricted Service Licenses – Notes for Applicants*



it is clear that student radio services broadcasting to a defined site are no longer as effective as they once were.

With this in mind, the Student Radio Association calls for Ofcom to amend the licensing terms to permit student radio stations to acknowledge student listeners outside of a pre-defined site. Additionally, we request that in cases where there is proven demand, and where spectrum availability permits it, that student radio stations broadcasting on long-term restricted service licenses be allowed to increase their transmission power in order to maximise the student population they reach.

3. That as VHF Band II (FM) spectrum is released by commercial and BBC stations moving to digital, it is made available for an increased number of community and long term LPFM RSL stations.

It seems increasingly likely that as the ownership of DAB radio sets increases, a greater number of commercial radio services will wish to reduce their operating costs by broadcasting solely on digital platforms. We believe that this probably won't take place for a considerable period of time, and that when it does it will take place inconsistently across the country.

We believe that fewer radios are being manufactured and sold with the capability to receive medium wave, and certainly most models of dual analogue / DAB radio seem capable of only receiving FM broadcasts. We expect that this will continue to be the case, and as such propose that as VHF Band II (FM) spectrum is vacated by commercial / BBC stations, it is made available for those currently broadcasting medium wave services.

4. That it is made easier for Student Radio Stations to obtain community radio licenses – through a simplification of the application process, and a reduction of revenue restrictions.

Many student radio stations currently meet the characteristics of a community radio service as laid out in the Community Radio Order 2004.

They exist primarily for the good of a specific community of people who all undergo education in a particular area (in some cases a community of as many as 60,000 students). They offer training and development opportunities to the target community as part and parcel of their existence, and due to the way in which many have associations with Students' Unions, are entirely accountable to the student body for their actions.

A small handful of Student Radio Stations have applied for and successfully obtained community radio licenses, however it is perhaps surprising that many more have not, when you consider that much of the infrastructure and momentum already exists.

In many cases, it appears that the reason for the slow and limited uptake of community radio license by student radio stations relates to the restrictions placed on funding of the service. A large number of student radio services are fully or partially funded by the Students' Union at the institution they serve, with remaining funding being obtained through advertising and sponsorship.

At present the Community Radio Order prevents a Community Radio Station from receiving more than 50% of it's annual funding from any one source, and

would therefore prevent student radio stations being operated and largely funded by Students' Unions as currently happens.

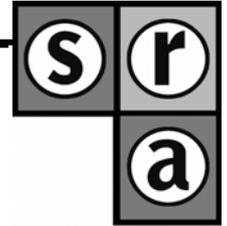
We would therefore urge Ofcom to make recommendations to Government that such restrictions be reconsidered, and that the appropriate legislative change be made to enable Students' Unions (which are often registered charities) to own and fund community radio stations.

5. That the Student Radio Association, as a body representing the interests of Student Radio Stations in the UK is invited to participate fully in any further discussions, and that student radio is given due consideration to a greater extent than at present.

Our final recommendation is that the Student Radio Association is included in any further consultation process, and is given due consideration with bearing in mind it's recognised value within the industry.

Year on year the Student Radio Awards demonstrate the outstanding achievements of the Student Radio Community in the UK, and student radio alumni take their first steps into the 'professional' radio industry. It is important that Ofcom appreciate the value of Student Radio and include us at the earliest opportunity in any discussions which may impact on our ability to continue broadcasting license radio services.

Summary & Conclusions



THE STUDENT
RADIO ASSOCIATION

The Student Radio Association fully welcomes the current consultation, and the attempts by Ofcom to effectively manage changes within the broadcasting industry which have effectively been brought about by technological evolution.

We understand that currently there are huge demands on the available spectrum, but with an increased uptake of digital radio by consumers, and a slow transition from FM to DAB platforms by broadcasters there should be more available space which lessens the need to restrict student radio services.

We support proposals to review the funding restrictions for community radio stations, with the hope that more student radio stations are able to take advantage of community radio licenses where available.

In other areas, we would ask that Ofcom look at reducing restriction placed on long-term RSL operators, to enable student radio stations broadcasting on LPAM to better serve student populations.

In time, we hope that enough space will become available on VHF Band II spectrum (as commercial stations make the transition to digital) that a majority of LPAM services can be moved to FM.

Finally, we urge that talk of analogue 'switch-off' is postponed indefinitely whilst there are still stations for which there is no feasible transition to DAB / DRM platforms making use of it.