

Title:

Mr

Forename:

Simon

Surname:

Walker

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

Simon Walker

Representing:

Tameside Community Radio

What are your comments on these proposals?:

6.1

Tameside Community Radio believe that attainment of the social gain objectives should be the principle control mechanism of community radio together with the guides and codes that apply to all broadcasters. Tameside Radio would welcome stringent and monitored social gain objectives.

6.2

Tameside Radio welcomes Ofcom's comments on this issue. The changing nature of public and charitable giving makes five year financial proposals with a clear commitment of funds for a five year period extremely difficult. We welcome Ofcom's view that a one year timescale is both practical and achievable

6.5

Evidence of community support for a project should be clearly visible during the application process as should the linkages between the applicant group, statutory agencies working within the area and community organisations. The support should be evidenced not solely in the social gain objectives but by the agencies and groups publicly committing themselves to support the community radio project with those social gain objectives.

6.6

Tameside Radio believe that this should be the key measure of success and failure of community radio groups. Stringent key commitments and monitoring to ensure delivery as promised in the application document.

6.7

Although Tameside Radio agree with the proposal. We would like Ofcom to assist community radio applicants by producing minimum standards or guidance on the types of processes and procedures successfully used in other applications.=20

6.9

Tameside Community Radio recognises the diverse nature of community radio and the ability of community radio to raise operating finance should be no less diverse. In addition Tameside Radio recognises that increased numbers of community radio groups are putting additional strains on regional and national grant bodies, the ability of community radio to trade widens the available funding of this tier of radio.

Tameside Radio understands the intention of Ofcom when considering the sources of funding of community radio, we would contend that in some circumstances the limit of 50% from one source is to low. We believe that the reality is that where a community radio station obtains above 70% of its operating funds from public and charitable sources it does so only with the tacit support of its principle funders whether or not they approach the 50% threshold. The influence of these funders does not materially change regardless of a threshold of 20% or 75%. We believe Ofcom should consider the role of the funder in the ongoing project and not just the financial commitment in any particular year. Tameside Radio would argue, for example, that funding for a project at 100% from, say, European Funds would be a benign contribution and should be encouraged. We understand the concern that Ofcom have regarding financial support requiring a particular editorial slant and would urge Ofcom to use the programming and advertising codes to ensure impartiality and balanced output. One could argue that allowing wider financial support of community radio by increasing the 50% advertising threshold diminishes the influence that any one financial contributor has over a particular radio station.

6.10

Recognising the financial value of a volunteer is welcome. There are, within the voluntary sector, mechanisms for calculating the value. Tameside Radio would not welcome two aspects of Ofcom's proposals (a) to only recognise certain categories of volunteering as having a value. Tameside Radio would urge Ofcom to reconsider this as it could have a negative impact on the volunteering process and lead to unnecessary divisions between volunteers and (b) to only recognise time on air. We train our volunteers that preparation is everything! Some volunteers need considerable time (and support) to produce their programme strand whilst others may be required to undertake considerable research. For example, a volunteer news reader may spend only 3 minutes per hour on air, but they are volunteering and undertaking duties that far exceed the on air time. We would argue that, properly monitored, the full extent of volunteering should be recognised.

6.11

The restriction on people connected to commercial radio and the BBC will, in the longer term, have a detrimental effect on the development of community radio. The skill & knowledge pool that exists within commercial radio and the BBC should be tapped into rather than rejected out of hand. Tameside Radio would urge Ofcom to review this and allow individuals who are connected to become involved in community radio but to exclude the licensees. Tameside Radio understands Ofcom's concerns but believes that the social gain objectives should be the overriding factor in determining and measuring performance. To ensure that community radio is independent of commercial radio and the BBC there could be a limit on the number

of individuals that are 'connected' that could be involved in any one community licence.

6.15

Tameside Radio believe that the social gain objectives should be the over riding factor in awarding and measuring the success or failure of community radio. We further believe that the increased number of community radio stations is putting additional pressure on national and regional public sector and charitable resources.

The protectionist view, in restricting the ability of some community radio groups from obtaining any income from advertising revenue, should cease. We believe that it is not in the long term benefit of radio for inefficient and underperforming commercial radio stations to be protected from the community they are meant to be entertaining and informing. We believe that relaxing of regulations, included elsewhere in Ofcom's consultation document, that control the activities of commercial radio is significant compensation. No other commercial enterprise is protected in this way and we would urge Ofcom to free the community radio groups that suffer from this situation.

Community radio stations are community businesses and should be allowed to trade as businesses. Tameside Radio can not see anything wrong with utilising advertising revenue for social gain purposes. There are good arguments that the influence of one, of many, advertisers is far less a concern than the influence of one significant public funder.

Tameside Radio would welcome the relaxing of the 50% maximum advertising rule. We believe that in the longer term this restriction will inhibit our ability to maximise our social gain potential.