

Afan FM for Neath & Port Talbot



CONSULTATION RESPONSE

**"Radio Restricted Services & 55 to
68Mhz – A Consultation"**

Please accept this as our formal response to your consultation on Restricted Service Licensing and the use of the 55-68Mhz band for Audio Distribution Services.

Afan FM is a Community Radio licensee for the Neath Port Talbot area of South West Wales, serving young people aged 11-25 with a music based information service. Afan FM has conducted four previous S-RSL broadcasts, whilst I have personally been responsible for these as well as organising an S-RSL for a proposed Rock station in Swansea (FM102.1 The Rock).

As we are not experienced in the systematic proposals for ADS-RSL's – we have refrained from offering a response from questions 7-15.

I hope you will consider my responses which I have been asked to submit on behalf of Afan FM and I sincerely hope they will assist in your deliberations when discussing these responses.

Many thanks,

Craig Williams
Station Manager

QUESTION 1

“Do you agree with the proposal to liberalise the restrictions on the issuing of S-RSLs in all areas where a new commercial service is advertised, or where a new commercial or community service is due to be, or has recently been, launched?”

Afan FM agrees with the idea of “liberalising” the conditions to protect the interests of commercial and community broadcasters.

QUESTION 2

“What is the most appropriate way for Ofcom to decide between competing short-term RSL applications for broadcasts to the same event in the same area at the same time?”

We do not believe that the current process of “drawing lots” represents an effective way of dealing with competing RSL applications at this time.

We believe that whilst time consuming, Ofcom should consider the “Beauty Parade” proposals that it set out in its consultation document – this would allow Ofcom to ensure that the best candidate would be rewarded with the license.

As an idea to consider, for such a regular custom as Ramadan – Ofcom should consider issuing a “recurring” RSL licence to a group to conduct consecutive, annual RSL broadcasts. For example, every three years Ofcom could invite applicants to apply for a Ramadan licence to serve a particular area and then use the “Beauty Parade” judgement system to select a candidate to award a three year rolling RSL licence to them.

These licenses would only be permitted to operate for 28 days between the two particular dates of Ramadan, and are of course subject to the payment of all the relevant broadcast licensing fees. This method would, in the long run, reduce the need for Ofcom to keep dealing with identical annual applications whilst also ensuring that the best candidate was rewarded as well as ensuring a small level of consistency that would benefit listeners and local businesses.

QUESTION 3

“Do you have any comments on other areas of S-RSL policy, as set out in the ‘Notes of Guidance for Applicants’ that you would like to bring to our attention?”

We do not, at present, have any objections or comments regarding the policies that govern the issuing and operation of S-RSLs.

QUESTION 4

“Do you agree with the proposal to allow commercial establishments to apply for L-RSL licences?”

We strongly disagree with the proposal to allow commercial establishments to operate L-RSL services.

By allowing commercial establishments to operate these services, it is quite likely that it would have a severe effect on the advertising income of commercial and community stations in the local area. Whilst we appreciate Ofcom’s intention in extending access, we feel that it is important that commercial bodies like shopping centres or theme parks continue to liaise with their local commercial or community station to promote themselves rather than being allowed to conduct an L-RSL service.

We also question whether these commercial outfits would be able to meet the conditions of its licence with regard to programming matters – to what extent will these organisations be allowed to disregard news and speech output? We fear that by allowing commercial establishments to apply for L-RSL licences, we will see the utilisation of precious spectrum space purely for the use of a rolling music service for customers and clients.

We feel that the current model of L-RSL licensing is adequate and should continue.

QUESTION 5

“Do you agree with the proposal to offer L-RSLs for shorter periods of one year or more, up to a five-year maximum?”

We do not feel that the current licensing model needs to be changed at this present time.

By ensuring that a consistent L-RSL service is available, it will ensure that the operators are obliged to provide programming across the annual period rather than focusing its resources on just one period of the year.

However – we do feel that Ofcom should allow for joint proposals between Hospitals and Education establishments that allow them to “share” an L-RSL licence in this manner you propose. The majority of hospital radio stations in and around our local area do not provide live daytime programming, whereas student populations are more likely to listen at the very late hours or during the day.

Considering such a proposal would allow for a hospital station and a student station to negotiate daily times where they can broadcast their output on a certain frequency – this will allow those establishments without the resources to sustain a full service to deliver some form of service to their immediate population.

QUESTION 6

“Do you have any comments on other areas of L-RSL policy, as set out in the ‘Notes of Guidance for Applicants’ that you would like to bring to our attention?”

We do not, at present, have any objections or comments regarding the policies that govern the issuing and operation of L-RSLs.