

## **BCB (Bradford Community Broadcasting) response to the DCMS Consultation on Community Radio Licensing June - August 2009**

BCB offers this response to the consultation based on the practical experience of 7 years full time broadcasting, first as an Access Radio pilot station and now as a Community Radio licence holder.

### **1. Five Year Community Radio Licence Extensions**

BCB welcomes the proposal for extending the 5 year Community Radio licences for an additional 5 year period. We agree that this should only be possible when, after a review of the first licence period, the licence holder has shown that they have clearly met the key commitments of the licence. If this is the case then it is clearly sensible for a licence period to be extended rather than offered to a new operator. In principle, there should be no more onerous restrictions on Community Radio stations than Commercial stations in terms of licence renewal or extension.

### **2. 50% funding from one source**

The importance of Community Radio stations maintaining editorial independence is paramount and we feel that this should be enshrined in whatever regulatory systems are appropriate to achieve this end.

From our considerable experience over the last 15 years, we also believe that if there is only one main funder for the station, then there is the potential for the station be very vulnerable in terms of sustainability. They are also dependent on the whims of that funder. Therefore having some restriction on the level of funding permissible from one funder is still an important consideration for Community Radio stations and we believe that this should stay. Whether this is 50%, 60%, or 70% is a debatable point (and one that I don't have particularly strong feelings about) but feel that in principle some restriction in order to encourage CR stations to seek a broader funding model is desirable.

I do have some thoughts over whether the restriction should be over the 5 year licence period or an annual restriction. I am very aware of how difficult it is at the moment to sustain levels of funding for Community Radio stations. There has never been greater competition for public funding in the VCS and many of us find that considerable amounts of time are spent on submitting funding bids, many of which are inevitably unsuccessful. Major funding streams regularly come to an end and there is often not anything to replace them. This can leave the station in a very difficult financial situation whilst they reorganise the station finances, often having to make substantial reductions in operating costs (which is usually staffing).

With this in mind I am aware that there may well be a 12 month period during which a station which is committed to ensuring that they have a diversity of funding streams does in fact become dependent on one funder. This could

mean that in that particular annual period they would receive more than 50% from this one funder.

I would like you to look at this situation and consider whether this scenario can be reflected in any future regulatory changes.

### **3. Prohibition of Community Radio stations overlapping with local licence holders with coverage of under 50,000 adults**

We feel that this is an unnecessary restriction for the sector and should be lifted.

The Ofcom annual financial reports from Community Radio stations have shown that very few stations do actually raise substantial sums from commercial income. The funding model is likely to include commercial income as a percentage of the total income but the statistics show that for most stations, even in urban areas with high TSAs, this is not a major source of income for most stations.

Therefore the protection currently offered to smaller commercial stations in the initial Community Radio legislation is, in fact, unnecessary and should be removed.

Any new move to extend the fundraising restrictions on community stations in areas where they overlap with local stations of 150,000 coverage is completely unfair. As mentioned above, the evidence from full time Community Radio stations, both in the Access Radio pilot phase and the first 3 years of Community Radio licences, has shown that most stations neither seek nor achieve major commercial income. The model suggested by Professor Anthony Everett in his report on the Access Radio pilot stations, was to fund each Community Radio station to the tune of £30, 000 - £40,000 from a Community Radio Fund. With this level of ring-fenced funding for Community stations, it might be possible to consider restrictions on the sources from which community stations raise their money.

**As this is not currently the case, the idea that local ILR stations are offered further protection is preposterous and must not be considered in this review.**

Community Radio stations are social enterprises and, in line with all government thinking, must be allowed to flourish as not-for-profit community businesses. The current Community Radio Order rightly provides a very tight legislative framework in which Community Radio licences are awarded and in which stations must operate. With any further unnecessary restrictions on how they should operate, there is no hope for the sector surviving, let alone becoming sustainable.

Mary Dowson  
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