

# Amendments to the Community Radio Licensing Regime

This memorandum is written on behalf of

## **CBC – Christian Broadcasting Council**

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The Christian Broadcasting Council of the United Kingdom (CBC) wishes to give our views regarding DCMS's invitation to comment on their consultation on the Amendments to the Community Radio Licensing Regime published 16 June 2009. We give below our responses to the three questions that have been posed in this consultation and comment also on Community Radio's use of frequencies in the future.

### **Q.1 Do you agree with the proposed criteria for Ofcom to apply when considering a 5 year extension?**

CBC believes that there is a need for community radio licences to be extended by at least 5 years. Our preference would be for the total length of licences for community radio stations to be 12 years as it often takes at least 3 or 4 years for a station to become established and to find its place both within the community it is serving and within the wider range of listener choice on the radio dial/digital display.

We agree with Ofcom's criteria by which a station should be judged prior to being offered a license extension namely:

- a. The licence holder's ability to maintain the service for the period of the extension;
- b. The extent to which the existing licence conditions have been met and the likelihood of a licence condition being breached during the extension period.

It must be remembered that the USP of community radio is in fact its localness and how it serves its target audience.

### **Q.2 Do you think the 50% funding restriction from any one source should be lifted?**

Currently community radio is restricted from receiving more than 50% of its income from on-air advertising or sponsorship.

CBC believes that this specific restriction should be lifted for all community radio services as the service area for these stations is supposed to be restricted to a 5 km radius. The area available to a station to sell its advertising and sponsorship airtime is therefore automatically restricted. However some community radio stations are currently receiving up to 40% of their funding from local authority community funding sources. This we believe is unhealthy for the long-term viability of these stations.

CBC would therefore propose that:

1. The restriction on on-air advertising/sponsorship being no more than 50% of a station's revenue be removed.
2. Other sources of funding must be restricted to less than 50% of revenue in order to stop a single financial donor, be they be a 'Mr Big Bucks' or a local authority, having an in-direct influence on the operation of the station.

**Q.3 (i) Do you think that the rule prohibiting a community radio station from being licensed if it would overlap with an existing local radio service whose MCA is no more than 50,000 adults, should be lifted?**

**(ii) If so, should the advertising and sponsorship restriction be applied to community radio stations that overlap with local radio services of up to 150,000 adults?**

CBC's response to Q.3 (i) is NO. We believe that this restriction should continue as it applies only to parts of the country where there is already a small-scale commercial radio station that in most cases is operating as radio station for the local community.

Our answer to Q.3 (ii) has already been stated in our answer to Q.2. There should be no restriction on a community radio station's ability to sell on-air advertising and sponsorship as this is restricted to their coverage area that is normally only a 5 km radius.

**Additional Comment: Support for the "Digital Britain" report and its proposal regarding the use of FM frequencies for small-scale radio stations.**

Going back as far as 2005 CBC had proposed in our written responses to Ofcom that national radio stations and "heritage" commercial station should be moved to DAB and stop broadcasting on analogue frequencies.

In 2007 we said in a response to another Ofcom consultation that the FM Band should be re-organized by clearing it of all national broadcasters – BBC R1, BBC R2, BBC R3, BBC R4 & Classic FM – and all BBC local stations as well as local commercial stations that have space on DAB multiplexes. This move would then allow for Small FM Commercial Stations (under 300 watts erp) to continue broadcasting on FM and for licensed low-powered FM broadcasting by other small stations – Geographical Community Stations, Community-of-Interest Community Stations, Educational/School/Hospital Radio and RSL broadcasts. Such a use of the FM Band would allow for existing un-licensed ethnic stations (especially in London and other metropolitan centres) to apply to operate legally as Community-of-Interest Community Stations.

CBC therefore supports the DCMS "Digital Britain" report and its proposals for DAB and the use of FM for small-scale radio stations including community radio.

We hope that our comments are of help to the DCMS in the further formulation of their policies with regard to radio broadcasting.

Yours truly,

Mrs Olave Snelling

Chairman of the Executive Council – Christian Broadcasting Council

J Peter Wilson

Consultant to CBC on Broadcasting Regulation

20 August 2009

The Christian Broadcasting Council, known as CBC, was founded in 1983:

- ⌚ To stimulate and promote the knowledge of the Christian faith and the propagation of the Gospel of Jesus Christ through the broadcasting media in the United Kingdom.
- ⌚ To encourage the highest standards of Christian media communication.
- ⌚ To support and develop the knowledge and standards of all those involved in broadcasting.
- ⌚ To bring together in fellowship those working in broadcasting and those who support the vision of CBC, under girding and encouraging them in their spiritual lives