

Hi

Below is the response to the 'Consultation on Amendments to the Community Radio Licensing Regime' (on behalf of Future Radio).

Future Radio is an established community radio station based in West Norwich. After broadcasting on RSLs for a number of years we commenced full time broadcasting in August 2007, and have now been on air for just over 2 years. Future Radio recently applied to *Ofcom* for a new, extended community radio licence to cover Norwich and periphery areas, and from spring 2010 we will be re-launching Future Radio as a wider service.

Future Radio is also part of Future Projects – a community based regeneration charity that provides school education, music and media courses, DVD production, advice and guidance and a range of other training and media production services to the Norwich area.

Questions/Responses

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

Future Radio supports the proposals by DCMS that there should be opportunities for community radio stations to make applications to Ofcom to extend their licences beyond the initial 5 years. Due to limited operational budgets, in our experience, it can often take a few years for community radio stations to become firmly established, and the current 5 year licence period is insufficient. We agree with the CMA's response that stations should be able to extend their licenses based on successful evidencing that they have achieved all the requirements of their key commitments, as agreed with Ofcom. We also agree that stations should be allowed to apply for additional 5 year extensions as opposed to a singular, 'one off' application – again these applications should be judged on the merit of the individual stations to evidence that they have community support and are meeting all of their agreed key commitments.

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

We believe it is down to individual stations to maintain their editorial independence and adhere to the broadcasting code, regardless of funding contributions to the service. Therefore we agree with many of our contemporaries that the 50% restriction should be lifted. Like others though we support the idea of increased communication and documentation (e.g. Annual Reports) about significant funders, and how stations have ensured editorial independence has been maintained and ensured. As it is already a licence requirement that stations ensure editorial independence we believe this should offer enough legislation to ensure that community radio service are not unduly influenced editorially by someone who may fund over 50% of the stations running costs. With the nature of some grant funding the current 50% limit also suggests flaws. At Future Radio we have found ourselves in the situation where a local regeneration organisation (who has funded us for many years) were in a position to offer us increased funding – this would have pushed their contributions over the 50% mark, and therefore wouldn't have been allowed – despite the fact that the aims and objectives of the regeneration organisation match those of ourselves and, broadly speaking, a lot of those shared by all community radio stations. In the end we were able to secure other funding which allowed us to take on the additional funding by the organisation, however it outlines a flaw in the current 50% funding restriction in our opinion.

Regarding the 50% rule on commercial revenue, that currently affects all licensed stations, regardless of MCA – we support the maintenance of this quota, or at least some form of quota. Our reasons behind this are that a combination of grant funding and advertising can ensure that the unique nature and sound of community radio stations can be preserved. Without due monitoring of commercial activity (as well as social gain outputs) our concerns would be that we could see a rise in community stations operating as small scale ILRs, with a neglect towards social gain outputs over increased commercial activity. If this 50% limit is lifted the monitoring systems in place would need to be reviewed to ensure that all stations are still operating with social gain at the heart of their broadcasting

policies as increased commercial activity, or the quest for this, could easily have a negative effect on stations output, relative to the overall aims of community radio.

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?

We agree with John Myer's findings, and support the view of the CMA that the restriction preventing the licensing of a station with a MCA of less than 50,000 should be lifted.

We also believe that the advertising and sponsorship restrictions applied to any community station with an MCA of under 150,000 should be removed. We support the view of the CMA that some of the advertising restrictions currently in place on community radio services are too restrictive, and an unfair competition rule, furthermore it is evidence of how too many of the current rules and restrictions of community radio stations have been based on a protectionist policy towards commercial radio, stretching back several years. Given the recent relaxations surrounding commercial radio stations output, format and other aspects of their operation it suggests an imbalanced approach to legislation for the two services which is wholly unjustified.

Tom Buckham
Station Manager, Future Radio