

Hello there

I believe you are consulting over community radio and commercial stations with a TSA of less than 50,000. SIBC's official TSA is 15,000 to 16,000.

You might like to know the effect the licensing of Shetland Tourist Radio 60-North has had on SIBC.

The following are the figures for tourist related advertising on SIBC in recent years. Advertisers (including Visit Shetland itself) decided to rely on free plugs on Shetland Tourist Radio 60-North instead of actually spending on SIBC.

Please note that It is our essential summer months tourist-related advertising revenues only that have collapsed, matching the time of existence of Shetland Tourist Radio.

Year ending: GBP

Sept 2005: 12,795

Sept 2006: 14,295

Sept 2007: 12,837

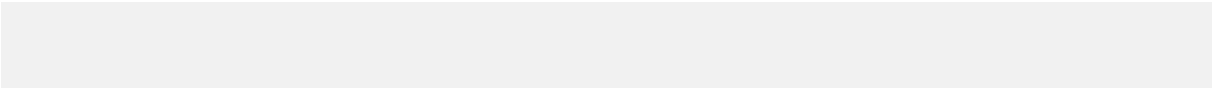
(Start of Shetland Tourist Radio)

Sept 2008: 3,025

Sept 2009: 2,850 (to date)

This has directly affected the family's livelihood, which was always modest enough as it was, and it has probably sealed the long term future of SIBC (or, now, lack of one).

Ian Anderson and Inga Walterson
SIBC



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By email to Community_Radio@culture.gsi.gov.uk

Dear Sirs

Consultation on Amendments to the Community Radio Licensing Regime

I am writing to you regarding the measures contained in the above consultation, which could potentially impact on the viability of the smallest commercial radio stations including SIBC, which has an official TSA of under 16,000.

The proposal that is of particular concern is the possible removal of the current rule prohibiting a community radio station from being licensed where it would overlap with an existing local radio service where the MCA is less than 50,000.

This current restriction formed part of the Community Radio Order 2004 and was seen as appropriate at that time as a measure to ensure the viability of small local radio services. But that did not stop the licensing of Shetland Tourist Radio 60-North.

You might like to know the effect the licensing of Shetland Tourist Radio 60-North has had on SIBC, with tourist related advertisers (including Visit Shetland itself) deciding to rely on free plugs on Shetland Tourist Radio 60-North instead of actually spending money on SIBC (everyone likes something for free).

Tourist related advertising only:-

Year ending:

Sept 2005: £12,795

Sept 2006: £14,295

Sept 2007: £12,837

(Start of Shetland Tourist Radio)

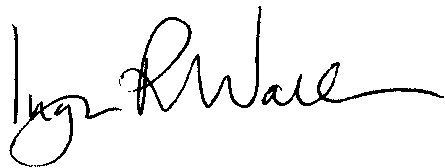
Sept 2008: £ 3,025

Sept 2009: £ 2,850 (to date)

The presence of an additional radio service can also create confusion among listeners and fragment local audiences, meaning that small and community-focused commercial services could become financially unviable, irrespective of the protection provided by a limitation on advertising by Community Radio. There is already a long standing BBC opt-out in Shetland that carries free "what's ons", reducing our potential to charge for entertainment advertising.

Therefore I would urge the DCMS to resist any proposal to remove the existing restriction on licensing a Community Radio stations that would overlap with an existing local radio service whose MCA is no more than 50,000. Also please think long over the impact of the licensing of more stations such Shetland Tourist Radio 60-North elsewhere and the diversion or loss of tourism related advertising.

All the best



Inga Walterson
Managing Director
SIBC

21 August 2009

SIBC is the radio station of the Shetland Islands Broadcasting Company Limited

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Registered in Scotland number: SCO 095224 VAT registration number: 430 2607 93