

Dear Sirs,

We are writing in response to your consultation on amendments to the community radio licencing regime. We are fully supportive of the position formulated by the Community Media Association, in particular the following aspects:

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

We believe that when a station is demonstrably adding value to its local community, then there should be a possibility of on-going licence renewal for as long as it continues to do so.

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

We strongly believe that this restriction should be lifted, especially as the central fund set-up to assist community radio stations with grants is so restricted in size. It takes considerable effort by volunteers to set-up and run all aspects of a radio station. If relatively low-labour sources of income such as advertising or sponsorship are artificially limited, this in turn means devoting more volunteer effort in securing funding from more labour-intensive sources of income such as fund-raising events. There is a practical limit to the amount of volunteer resource available in an area, so such fund-raising necessarily means either detracting from activities directly linked with running the station and/or jeopardising the financial security of the station. Furthermore we know from experience that there is a huge tier of local companies who cannot or will not advertise on conventional commercial stations, yet readily wish to advertise with their local community radio station. This is part of the contribution made by local community radio stations in support of their local business community and should not be artificially restricted.

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 see no reason to apply market distortions to protect small local radio stations at the expense of small community stations delivering real benefit to their community. We believe community radio serves a different segment of the audience to conventional commercial local radio and can provide evidence that it attracts new advertisers who would otherwise be excluded from radio advertising. In this way, local community radio can both support the economic life of its local community and complement local commercial radio.

Yours Faithfully

Glyn Roylance - Director  
David Primrose - Director  
Tim Harrison - Director  
Ken Mitchell - Director

Severnvale Media Community Interest Company - operators of Thornbury FM