Lucinda Guy, individual

Question	Your response
Question 1: Do you agree with Ofcom's proposed approach to remove specific music genre requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N Music can't be defined by genre – it is a profound way in which people form identity, connect and share. Rather than each station listing genres, all community radio stations should be required to offer something very different than commercial radio stations. Appropriate requirements would be: volunteers are empowered to choose their own music and curate their own playlists; stations commit to including music by local musicians, including live music as well as recordings.
Question 2: Do you agree with Ofcom's approach to remove specific speech content requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N Speech is the manner in which humans connect with one another, share ideas, fall out, fall in love, plan their environments, navigate boundaries and entertain each other. Speech content is the essence of community radio. In my experience, it is valuable for new programme makers to start off playing their music. Maybe by their third song they will chat a little in between the tracks. By their 20th show the studio will be full of friends, poetry books, dogs, guitars. Speaking on air comes easily to those with pre-existing power, those who have a voice in their communities. Speaking on air is frightening and intimidating for those with less power. For example, women who have been told their voices are shrill and unpleasant and shouldn't be heard in public. Our work in community radio is to unpick and dispel these kinds of harmful myths, around who deserves to have a voice in public. Without speech content it is unlikely a community radio station can have a meaningful purpose and relevance to its target community. It cannot usefully be measured in terms of hours per day or week. Instead, all community radio stations must commit to the facilitation of speech programming. A new requirement should be: stations must take steps to facilitate a wide range of speech programming, and include diverse voices, styles and perspectives.

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Question 3: Do you agree with Ofcom's approach to remove original output requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N What would unoriginal output sound like? It's hard to imagine why a station would exist without original material, unique to that broadcaster. Again, measuring it in terms of hours is unhelpful. Instead, a simple statement that output should on the whole be unique to the station. Keep this in key commitments but remove the specific quotas.
Question 4: Do you agree with Ofcom's approach to remove locally-produced output requirements from Key Commitments? Please provide further information and/or evidence in support of your response.	Confidential? – N As above - keep this in key commitments but remove the specific quotas. On the whole, the output of a community radio station should be locally produced
Question 5: Do you agree with Ofcom's proposed approach to language requirements for community radio stations? Please provide further information and/or evidence in support of your response.	Confidential? – N I don't have a clear position on this, as my work is based in an area with less language plurality than some parts of the UK.
Question 6: Do you agree with Ofcom's proposed approach to standardising language in the character of service descriptions for community radio stations? Please provide further information and/or evidence in support of your response.	Confidential? – N It is likely that this area needs streamlining somewhat. However, stations should be required to lead on their own definitions, straplines, character of service, as it is a useful process for them to undertake and can help them to define their purpose.
Question 7: Do you agree with Ofcom's assessment of the impacts of its proposed changes? Please provide further information and/or evidence in support of your response.	Confidential? – N I have huge concerns about this. As I said in my additional statement, all of these changes could lead to increased use of automation in ways that are harmful to a station's community of makers and listeners, and lead to increased laziness and exclusion. Without the minimal protection afforded by proscribed hours of speech content, local content etc, community radio may become more homogenised, with gatekeepers strengthened to turn away volunteers. The consultation document seems to have been written in a different world, where community radio is populated by well-meaning but overstretched station managers. In fact, one of the

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	main reasons we have so much community radio is because its birth in the UK (2004-2006) coincided with the loss of independent commercial radio, and inspired a wave of nostalgia for that lost culture. Those left shipwrecked from previous pirate or commercial stations, wanted airwaves of their own to curate and control, to elevate their own voices and the voices of their own demographic, rather than the inclusion of target communities. Any changes brought into key commitments need to acknowledge and address the real problems, support stations to attract new volunteers, to be diverse and to have relevant programming for their communities. Ofcom and DCMS both need to be much more explicit about the purpose of community radio, and provide leadership in this area.
Question 8: Are there any impacts of these proposals which Ofcom has not recognised in this document?	Confidential? – N Yes, there needs to be a review of the process around licence breaches, for example, making helpful recommendations and reviews of stations. More in depth annual reporting. If these changes are to lead to a better culture of volunteer management, inclusion and plurality then they must be accompanied by regional training and support, such as the implementation of the UNESCO toolkit. These changes will only have a positive effect if accompanied by a cultural shift, increased training, better leadership.
Question 9: Do you agree with our assessment of the potential impact of our proposals on the Welsh language? Please provide further information and/or evidence in support of your response.	Confidential? – N I have no expertise in this area so will not comment on this.
Question 10: Do you think our proposal could be formulated or revised to ensure, or increase, positive effects, or reduce/eliminate any negative effects, on opportunities to use the Welsh language and treating the Welsh language no less favourably than English?	Confidential? – N Not my field.

Question	Your response
Question 11: Do you agree with our proposed compliance principles?	Confidential? – N There needs to be a move away from the 'name and shame' approach of the broadcast bulletins, towards support, recommendations and positive change. Badly managed stations that do not welcome diverse volunteers or have much original content should be required to recruit new directors, hold open days, review their training and induction etc.
Question 12: Do you agree with Ofcom's proposed next steps for varying Key Commitments?	The licence variation process needs to be handled in such a way that each station steps up to take more responsibility towards its target community and not less. Like a long-wedded couple who undertake a renewal of vows, this is an opportunity for stations to clarify and celebrate their true purpose and their commitment to their community. For this to happen, stations must be required to lead on the rewriting of their commitments, and use it as a moment of reflection on their organisational purpose.

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