# Oldham Community Radio

| Question | Your response |
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| **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? – NO<br><br>We are supportive of this proposal as audiences' tastes can vary over time. We believe that part of the remit of community radio is to provide programming not provided elsewhere. As other commercial and BBC services change music content over time, the ability for community radio stations to vary their output to remain as a complementary service is essential.<br><br>We believe that broad descriptions of music of interest to the stations target audience should be used, rather than listing highly specific genres.<br><br>Where specialist music programming forms part of a stations character we believe a reference to "Specialist Music" should be retained, while avoiding listing specific genres of specialist music. |
| **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? – NO<br><br>We support the proposal to remove highly specific speech content requirements.<br><br>We would be supportive of inclusion of a requirement that the vast majority of speech content should be editorially of interest to the stations specified audience allowing flexibility in how this is achieved. |
| **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? – NO<br><br>We strongly support this approach. "Regulation by stopwatch" does not work. We are pleased that in this consultation you have taken on board the feedback that ourselves and colleagues at other community radio stations have provided to Ofcom in various forums.<br><br>It is incongruitous that a presenter doing nothing more than "that was, this is" links between music is valued more as original content than a "local news package" and "what's on guide" inserted between music if these inserts had already been broadcast in an earlier time slot. The audience at different times of the day is different and a more relevant service and greater social gain is provided by broadcasting some content more than once.<br><br>We would be supportive of inclusion of a requirement that the vast majority of programming content should be editorially of interest |

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| | to the stations specified audience allowing flexibility in how this is achieved. |
| **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? – NO<br><br>We support this approach.<br><br>We favour an approach of key commitments specifying that the vast majority of programmes are of editorial relevance to the target audience.<br><br>There are various technical anomalies in the current definition of locally produced. The use of computer projections of MCA of a transmitter to define the local area does not reflect real world ability to receive the service, possibly in a slightly reduced technical quality, in many areas which a station would define as their editorial area. Simulcast of services on SSDAB and availability via smart speakers and the internet also have differing coverage areas.<br><br>The increased use of remote recording, broadcasting and cloud infrastructure highlight serious problems with the current definition of locally produced. As an example we have two station volunteers who reside in a local district a couple of miles from our transmitter site, the second of these lives three streets away from the first. They became a volunteer after being a listener and is located outside the estimated MCA area and anything they may produce at home would not be counted as "locally produced" under the current system.<br><br>The situation becomes even more unclear if you consider the potential of this programming being stored and broadcast using a cloud service where the 'virtual studio' could be hosted across multiple non-local datacentres, possibly even in other countries.<br><br>Another example is our specialist music brass band programme. Due to availability of volunteers, we are can only broadcast a locally produced programme on an ad-hoc basic. On other weeks we broadcast a syndicated programme recorded by a presenter from a neighbouring county who has been involved in the brass music scene for a long time. This programme has very limited personalisation for each station it is broadcast on so is clearly not "locally produced' and it would be a stretch to justify as "original." On the occasions we produce a local brass band programme it often contains live recordings from local venues, content not found on any other broadcast service. The combination of both sources of programming has a greater benefit to our target audience. This serves as an example of how we feel that all our programming should be |

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| | of editorial interest to our target audience and not based on an arbitrary quota of production location. |
| **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? – NO<br><br>We welcome the removal of specific requirements where this does not form a core part of the character of the service.<br><br>We would welcome the ability to broadcast some content in non-English languages where this would reflect audience needs but without this being highly prescriptive in the key commitments. |
| **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? – NO<br><br>We are supportive of this.<br><br>Consistency will aid understanding by both licence holders and the general public. |
| **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? – NO<br><br>We agree with your assessments.<br><br>We believe that the ability of community radio stations to concentrate resources on editorially relevant content and social gain benefits is highly positive.<br><br>These changes, if implemented, brings community radio regulation more in line with commercial radio regulation where many arbitrary specific format points and quotas were removed some time ago. |
| **Question 8:** Are there any impacts of these proposals which Ofcom has not recognised in this document? | Confidential? – NO<br><br>None. |
| **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? – NO<br><br><br>No Comment. |

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| **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? – NO<br><br>No Comment. |
| **Question 11:** Do you agree with our proposed compliance principles? | Confidential? – NO<br><br>As we have highlighted directly with Ofcom in the past, we strongly believe that many recent 'Key Commitment related' complaints are vexatious in nature. These changes and proposed principles would appear to largely mitigate this problem while ensuring that genuine complaints where a station is clearly deviating from their agreed core objectives and character of service can still be dealt with. |

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