

## Organisation name withheld

Question	Your response
<p><b>Question 1:</b> 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.</p>	<p>Confidential? – N</p> <p>Yes, we agree with the proposal. Unless a station has been created specifically to serve a musical community then the genre of the music they play does not need regulation.</p>
<p><b>Question 2:</b> 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.</p>	<p>Confidential? – N</p> <p>Yes we agree with the proposal. The specific speech content does not need regulation.</p>
<p><b>Question 3:</b> 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.</p>	<p>Confidential? – N</p> <p>Yes, the original output requirement should be removed entirely. There is currently undue over-regulation of community radio in this regard. Stations are being penalised for relatively small shortcomings. This is not proportionate or appropriate. Community radio is run on a best-endeavours basis. There is little that listeners gain by having stations have to throw together ‘filler’ original content where, e.g. a volunteer was unavailable for a show one particular week. It would be much better if station resources could be focused on training, social gain and community benefit. Removing the original output requirement would allow stations to focus on what really matters. It would also reduce regulatory burden on Ofcom and allow for a more appropriate targeting of resource from the broadcast licensing team.</p>
<p><b>Question 4:</b> 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.</p>	<p>Confidential? – N</p> <p>Yes, the locally-produce output requirement should be removed entirely. Similar to the above answer, there is currently undue focus on the meaning of ‘locally-produced’. At present, all stations face the situation where a regular presenter who normally presents a live show from the station’s studio may for vacation or employment reasons be away from the area. They could in theory record or live-stream their content; however this would not count as ‘locally-produced’ when it is in fact the very same person presenting the very same show. Indeed, the current requirement to have a</p>

Question	Your response
	<p>physical studio in the served community area is rather anachronistic; COVID showed that stations can thrive on remote technology, and community radio really came to the fore in servicing those around it. Requiring a physical presence requires premises which need heating, lighting and power, and it requires community members to travel to the premises – this does not sit well with maximising the sustainability potential that community radio can truly deliver.</p>
<p><b>Question 5:</b> 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.</p>	<p>Confidential? – N</p> <p>Yes, no specific comment here other than support for the general theme of reducing regulatory burden on community radio.</p>
<p><b>Question 6:</b> 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.</p>	<p>Confidential? – N</p> <p>Yes, any standardisation efforts across key commitments and licensees is most welcome.</p>
<p><b>Question 7:</b> 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.</p>	<p>Confidential? – N</p> <p>Yes we agree with this assessment. We believe removing the worry on stations on rigorous compliance will allow more creative, engaging and community-focussed projects to flourish. The reduced burden on Ofcom’s broadcast licensing team will be most welcome. It is widely admitted in the community sector that a large proportion of complaints to Ofcom are vexatious or mendacious (often from other slighted individuals with a grudge against a particular community organisation). This petty regulation has no place in what should instead be a thriving provision of social gain, representation of diversity and community spirit.</p>
<p><b>Question 8:</b> Are there any impacts of these proposals which Ofcom has not recognised in this document?</p>	<p>Confidential? – N</p> <p>We expect the commercial radio sector, as represented by Radiocentre et al, will protest against these proposals. We would ask Ofcom to give a balance due consideration to any such representation. The commercial sector has been significantly deregulated over the lifetime of community radio. With the passing of the Media Act 2024 just this month, further deregulation will occur. We</p>

Question	Your response
	do not protest this – indeed, we support deregulation across the board. It would be grossly inappropriate to reduce the scope of these community radio proposals merely to satisfy the commercial industry body.
<p><b>Question 9:</b> 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.</p>	<p>Confidential? – N</p> <p>n/a – as a station in England, we do not feel it is our place to comment here.</p>
<p><b>Question 10:</b> 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?</p>	<p>Confidential? – N</p> <p>n/a – as a station in England, we do not feel it is our place to comment here.</p>
<p><b>Question 11:</b> Do you agree with our proposed compliance principles?</p>	<p>Confidential? – N</p> <p>Yes, these seem fair and balanced. Time and support will be needed to work with community stations in updating their key commitments following any changes. A grace period (similar perhaps to what was informally allowed during COVID) would be appreciated.</p>

Please complete this form in full and return to [broadcast.licensing@ofcom.org.uk](mailto:broadcast.licensing@ofcom.org.uk).