

## Thornbury Media CIC

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</p> <p>In order to best serve our community we need to be free to easily and rapidly (perhaps temporarily) respond to the wishes of our community.</p> <p>In addition, we need to adapt our musical genre according to the volunteers that we have available. As an entirely voluntary, not-for-profit organisation we have close to zero influence over the human resources available to us (because we don’t pay wages or have contracts of employment). So for example if we run a Country &amp; Western show and that presenter leaves for health or other reasons, it may not be possible to continue that show.</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</p> <p>In order to best serve our community we need to be free to easily and rapidly (perhaps temporarily) respond to the wishes of our community.</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</p> <p>Given that we are entirely voluntary, not-for-profit organisation, we have close to zero influence over the human resources available to us (because we don’t pay wages or have contracts of employment). Thus, commitments on original output are an additional, unnecessary burden. We feel that we are best placed to understand what our listeners want to hear.</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.</p> <p>We feel that the “locally produced” element of regulation is a strange hangover of 20<sup>th</sup> century broadcasting. New technology permits people to broadcast from anywhere on the planet, possibly beyond. Voice tracking is already a grey area, and, as technology marches on, this strange rule will get increasingly difficult to</p>

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	<p>understand, follow or regulate. We note that many commercial “local” stations deliver their content almost entirely from London or home-based studios, so we expect at least a level playing-field in this area.</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? – Y / N</p> <p>Yes.</p> <p>According to census 2021 94.62% of the population of South Gloucestershire (broadly representative of our coverage area) has English as their first language.</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? – Y / N</p> <p>Yes</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? – Y / N</p> <p>Yes, in general, and in large part.</p> <p>However, we feel that Ofcom’s insistence of a physical studio within the coverage area is a quaint 20<sup>th</sup> century requirement that should be eliminated or moderated because:</p> <ol style="list-style-type: none"> <li>1. From what we understand, stations with commercial licences are not mandated with this requirement.</li> <li>2. Furthermore, with the march of modern broadcasting technologies, it is arguable that stations could *better* serve their communities without the expensive encumbrance of a studio because it is possible to deliver quality broadcasts from something as simple as a laptop and a USB microphone. We know this from experience of delivering numerous outside broadcasts in our area.</li> <li>3. Sometimes stations are evicted from studio premises due to no fault of their own. It is not easy finding new and affordable studio premises, so pressure of sanctions from Ofcom during such a situation is undesirable for any voluntary organisation.</li> </ol>

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<p><b>Question 8:</b> Are there any impacts of these proposals which Ofcom has not recognised in this document?</p>	<p>Confidential? – Y / N</p>
<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? – Y / N No comment / <del>dim sylw</del></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? – Y / N No comment / <del>dim sylw</del></p>
<p><b>Question 11:</b> Do you agree with our proposed compliance principles?</p>	<p>Confidential? – Y / N Not sure</p> <p>We note that the term “character of service” is referred to 53 times in the document, however there is no definition of this term in the document. This seems significant, so it begs the question what does that phrase mean? Does it mean the same as the “Description of character of service” as in the original licence application, or something else? If it is not the same, then that may require us to modify our responses to some extent.</p>

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