

## Winchester Radio

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? – <del>Y</del> N</p> <p>Yes, the removal of specific music genre requirements, whilst maintaining the overall character of service, is sensible. It allows community radio stations to evolve with their audience without unnecessary regulatory intervention. For instance, in the case of Winchester Radio, our target community is those aged over 50. The music tastes of that target community have evolved over the years, as the generations that are aged over 50 have changed. The management of the individual stations are well-placed to know what music their target community enjoys. It also allows flexibility as volunteers with specific music knowledge come and go.</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? – <del>Y</del> N</p> <p>Yes, the removal of specific speech content requirements, whilst maintaining the overall character of service, is sensible. It allows community radio stations to adapt to the needs of their target community, to the news agenda (both short- and long-term), and provides flexibility as volunteers with journalism / speech radio skills come and go.</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? – <del>Y</del> N</p> <p>Yes, the removal of quotas for original output, whilst maintaining the overall character of service, is sensible. It enables stations to provide the best service they are able within the constraints within which they are operating, without worrying about being an hour or two under a fairly arbitrary quota in a particular week because of volunteer illness or holiday, or volunteers needing to be temporarily focused on other activities.</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? – <del>Y</del> N</p> <p>Yes, the removal of quotas for local output, whilst maintaining the overall character of service, is sensible. It enables stations to provide the best service they are able within the constraints within which they are operating without worrying about being an hour or two under a fairly arbitrary quota in a particular week. It is far more important that content is relevant to the audience than where the presenter is sat when producing it.</p>

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<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? – <del>Y</del> N</p> <p>This question is not applicable to Winchester Radio, as we broadcast solely in the English 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? – <del>Y</del> N</p> <p>This question is not applicable to Winchester Radio, as we broadcast solely in the English language.</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? – <del>Y</del> N</p> <p>Yes, the impacts on both the licensees and the target communities, as set out in the consultation document seem reasonable. Focusing on the character of service and the impact that the service has on the target community, rather than micro-managing stations through detailed format specifications and quotas, aligns with the regulatory regime employed by the Charity Commission for England &amp; Wales; one that Winchester Radio is familiar and comfortable with. We are fully supportive.</p>
<p><b>Question 8:</b> Are there any impacts of these proposals which Ofcom has not recognised in this document?</p>	<p>Confidential? – <del>Y</del> N</p> <p>None that we can think of.</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? – <del>Y</del> N</p> <p>As a station based in England, this question is not applicable to Winchester Radio.</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</p>	<p>Confidential? – <del>Y</del> N</p> <p>As a station based in England, this question is not applicable to Winchester Radio.</p>

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opportunities to use the Welsh language and treating the Welsh language no less favourably than English?	
<p><b>Question 11:</b> Do you agree with our proposed compliance principles?</p>	<p>Confidential? – <del>Y</del> N</p> <p>Broadly, yes. However, some clarification is needed:</p> <p>It would appear from previous investigations, reports of which have been included in Ofcom's Broadcast and On-Demand Bulletin, that Ofcom considers a week to start on a Monday, although we have not seen this written down anywhere. It would provide regulatory certainty if Ofcom could confirm that any "assess[ment] compliance over the course of a week" will cover a week commencing on a Monday.</p> <p>As quoted above, in point (a), you state that compliance will be assessed on a weekly basis. This is consistent with your encouragement of community radio stations to amend their key commitments from a daily basis to a weekly basis. However, in point (f), you state "we expect that most stations will continue to broadcast some original and locally produced output each day". This inconsistency is not helpful in terms of regulatory certainty. On the one hand, we're being told to think about our commitments across the course of a week, whilst on the other, we're being told that you "expect" "some" original and local content to be broadcast each day. Please provide more clarity as to what the rules (rather than expectations) are. Does it really matter if, for some reason, either on a particular week, over a short period of time, or even on an on-going basis, that all content on a particular day of the week originates from outside the local area, and/or is syndicated, as long as, across the week, the station meets its character of service?</p>
<p><b>Question 12:</b> Do you agree with Ofcom's proposed next steps for varying Key Commitments?</p>	<p>Confidential? – <del>Y</del> N</p> <p>Yes.</p>

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