

Dear Sir/Madam,

I write to you with some thoughts for your consultation period, thus closing on October 4th.

For SSDAB... I am first of all concerned that community stations, or SSDAB in general is, if correct, I am led to believe that the sector will be marginalised to DAB+ - whilst DAB+ is of good quality, and probably growing... that means there's a lot of older radio sets which only have the original DAB waveband will be denied, or face an inconvenient cost to essentially upgrade, again, to support their local community station or small-scale commercial station. Now, whilst it is a valid additional cost to upgrade, as you get Bluetooth stations on the newer sets... the rush to DAB, along with the switch from single dimension to HD, as well as the switch from vinyl to CD and the illusive mini-disc which never really took off... and now there's Ultra HD just to put pressure on the consumer and for that fact the broadcasters. Something for Ofcom to think about and possibly allow an increase or decrease for a community station that wants to, with justification, fulfil a two tier service between DAB and DAB+... though I appreciate, a decision would need to be made by broadcasters as to which digital waveband would be better to serve their community, taking into consideration many factors not least socio-demographic, age, physical and mental health and ability to upgrade to newer DAB+ sets rather than risk a digital divide.

Secondly, as a prospective broadcaster... I am contemplating internet broadcasting, as a trial, in part because finding support that you can rely on... other than a skeleton crew, which is ok but not ideal is nigh impossible... so I am, and I recognise this going to be hampered in what I want to do with SSDAB or internet radio, purely by nature of the audience and available "on-air talent", the general nature of the community or society. Now, I can operate on a skeleton staff, that's fine, but for what I'd like to do... well, can we make allowances within the licensing infrastructure that the vast majority lack experience, suitable skills and the like... the years of commercial radio nullifying us into a sub-culture of convenience or inconvenience has devalued the peoples, and handicapped them when it comes to contributing to society... purely because the nature of society has always been about convenience, or inconvenience delete as perceived fit, and so essentially, any future SSDAB may have to go back, before they can go forward... any existing SSDAB, or trial DAB station or current FM community station... may descend into a white elephant, or hocus pocus nonsense and be about as effective as a cat flap in an elephant house... put simply, can Ofcom consider including a caveat to allow for the limited skills, and for the fact for the media in general... both the BBC, commercial and future or existing community stations, well, a dose of something known as a reality check may be required, and from Ofcom... in administering future SSDAB and existing community stations, can we please recognise... that getting a crew that is reliable, and not a bunch of time wasting idiots... is damn hard work, and may be harder than the outlets that allow us to raise funds.

Thirdly, I am finding costs of setting up a trial or SSDAB... are coming down, dramatically.. yes, studios can be expensive, but can we have a decision from Ofcom as to whether the community radio fund is intended to be inclusive or a partial cash injection to a community radio station... I am thinking for SSDAB, the start up costs could from between £50,000 to £100,000 as a start-up which is a small drop in the pond, but still challenging to find... does Ofcom want to see their community radio fund used to establish community radio station, this in itself would make the case for state-supported community radio stations... which could be beneficial, both for where the communities are... deprived, or for the benefit that the community sector, could in theory support the work of the BBC... or is it Ofcom's plan to encourage community radio stations to gain experience in fund raising, as well as group building, in order to make the community station more resilient. This too makes valid sense, though one point of call – the community radio fund – for fundraising, would be equally as valid and create an ease with which to raise funds and essentially the quicker community stations can form and gain funds... the quicker we can get down to programme making.

Fourth, another factor which I've already touched on above, is does Ofcom want to make a separate case for future community stations, or existing community stations rebidding, to ensure that they don't end up as cheap man's commercial stations.. should there be a specialist caveat to ensure that community means community, in keeping with the CIC business infrastructure that many community stations will operate and trade under, is it enough to rely on community stations to voluntarily differentiate between themselves and commercial outlets on music alone, though recognising from above that speech may be challenging... we shall see, but does Ofcom agree that specialisation can be done voluntarily or is legislation and governance required which could, quite easily create community radio as a separate tier of broadcasting, whilst also recognising that due to a lack of knowledge, skills and the like, within the community, this could be a pipe dream to achieve, thus allowing community stations to be different from the opposition, but recognising there is scope if the talent and skills are there, to expand into more specialist areas of programming... cultural fusion, and linguistical differences spring to mind, but other areas and genres are available.

Fifth, the provision of news... as stands, in Bristol of our two main stations... one takes the local BBC, one takes from Sky as their news source... does Ofcom have any plans to legislate either the BBC, Sky, ITN or another, or a new provider specifically for the industry or state, because in my opinion taking Sky from London on a community station sounds sad, and relying too highly on local BBC is equally poor... but recognising, as per specialist programming that the talent base may not be there, what are community stations to do regards their news output which is, of course, in any good, or bad, democracy, social democracy or the like a rather important feature of both BBC, commercial and community. So, if Ofcom could legislate for Sky, BBC or ITN or another new service perhaps designed specifically for community stations, or stations outside London, or would this be too ambiguous.

Anyway, that is all I can think of for your consultation at this time... if I think of anything else, I'll be in touch before October 4th.

Yours sincerely,
Andrew Bush.

Further comments:

I was just having a considered thought following on from my previous email to your department, regarding the consultation on small-scale DAB... and it is just an idea, I thought I would add to the consultation with the potential for state-run, or at the least, state-supported community radio, that is to say, working with state officials or advisors, which sounds socialist or pseudo communist, but in the current model... I fear what is going to happen with community radio is that you're going to end up with a lot of corporate joker wannabe's whamming out commercialised output... whilst each to their own when serving the community, this is certainly true and some community radio stations are, with the commercial wannabe's in mind still valid, but sadly, missing the point of being relevant to the community. This being so, it also occurs to me that there is a distinct lack of skills, not terribly, but enough to restrict the community radio movement in, and hamper the progress of the people's movement... to such an extent as to get, community radio that's commercial wannabe's or community radio that is disappointingly weak, and I will impart some personal wisdom, it is, entirely soul destroying to be involved with a grass roots radio project that is lacklustre in its approach to the issue in question, and whatsoever the issue may be.

As I see it, community radio.. perhaps perceived by some as the poor relation, but I will leave it to your inspired experts at Ofcom to make a decision... is it more or less valid to have a state support infrastructure for community groups, who want to support the state's message, or leave community radio to battle, for every last bit of commercial revenue, potentially with the commercial big boys, in a David and Goliath battle so say, in perhaps a battle that David may not this time win, and thus resulting potentially though not necessarily in a weaker community infrastructure... I trust it's not Ofcom's intention to deny the people access to the airwaves, in favour of corporate entities... for it is only when the people are allowed to work with the state, or the governors of the country, or any country... rather than a divide between them and us, well, it may be possible for community radio to thrive amidst the big boys, but what is worth noting is the BBC is ad-free for a reason, not necessarily auntie's finest decision, but necessary to some degree since commercialisation would water down the corporation, so getting back to my original suggestion for your consultation... and I will leave it to yourselves, at Ofcom, to govern the media infrastructure in your esteemed wisdom, but do heed this, a stronger people power community media movement... albeit state supported, or answerable to the state, thus making sure it a) stays on message, and b) isn't a lacklustre effort in grass roots media, because we can do without those... community radio should be differential from the commercial entities, and equally a separate or possibly off shoot entity in line or not, to the BBC... community radio must work, and if that means state supported, so be it.... Either with financial support, or direct government oversight to ensure it is a valid outlet in the community, in society... if that means finding state support, then it'll surely be a small drop in the pond by comparison to many and much waste amidst government these days, well so be it, it will if it's managed correctly be money well spent.

Thanking you for your acknowledgement of this email, and I look forward to the consultation results.

Yours sincerely,
Andrew Bush.