Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: The Future of Radio

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Representing (self or organisation/s): Prescap Ltd. (Preston FM community radio project)

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Name   Richard Lace   Signed (if hard copy)

Introduction

1.   Prescap Ltd (Preston Community Arts Project) is a registered charity, currently running the "Preston FM" community radio project in Preston, Lancashire. The project has recently completed its fourth 28-day RSL broadcast, and currently engages around 250 volunteers from Preston and the surrounding areas, as well as working with a large number of community, voluntary and statutory organisations in the city.

2.   The Preston FM project has been in existence since Spring 2005. It is the intention of Prescap Ltd to apply for a community radio licence during the present North West England licensing round.

3.   This response has been prepared by the Preston FM project steering group, which comprises representatives from the project's volunteer base as well as local Further and Higher educational institutions, the voluntary sector, regeneration bodies and Prescap Ltd itself.

Responses to Proposals

Proposal 3
"While we do not currently propose that a date should be set for the switch-off of analogue (FM and AM) radio, we should aim to maximise flexibility in the licensing system so as to be able to free-up that spectrum for other uses, when the time is right."

4.   We are concerned by the proposal to use market mechanisms as the predominant method for future allocation of spectrum currently used for FM and AM radio. It is unrealistic to expect the community radio sector, and other broadcasters providing radio services focussed on public and social purposes, to afford the market rate in such an allocation. Provision must be made to ensure that sufficient affordable spectrum is available to community broadcasters in the event of band II "switch-off".

5.   We note that the consultation document does not include a demographic break-down of the take-up of digital radio. Our experience is that those least likely to migrate away from FM listening include those that can most benefit from the benefits that community radio can offer – including older people and those living in areas of multiple deprivation. For the same reason, we are convinced that internet broadcasting, by itself, is not a suitable platform for community broadcasting in the future.

6.   Besides allocation and costs of spectrum, migration away from the FM or AM platform will be a significant and costly undertaking for small broadcasters. The technical expertise required to set-up and maintain digital broadcasting, as well as the cost and complexity of the infrastructure and connectivity required, is significantly different from the analogue world that most community radio projects currently operate within. It is our view that broadcasters, and in particular community radio broadcasters, should be given the freedom to move to digital platforms at their own pace, and not be forced into a move that they cannot afford and for which they and their listeners are not prepared.

7.   The ability for organisations to operate short-term broadcasts (currently licensed through RSLs) is vitally important, and will remain so even following any eventual move away from analogue broadcasting. RSLs are currently a valuable

tool for community and voluntary organisations – not just those engaged in community radio projects, but also those operating special events and those providing services to at-risk young people and other "hard-to-reach" sections of the community. Any future licensing system should continue to allow for affordable, short-term broadcasts to be undertaken.

8.   Whilst we are not opposed to a review of the use of band II spectrum (suggestion 3.2), we propose, in light of the points made above, that such a review should also include consideration of a realistic and achievable "progression route" for licensed FM services at any common end-date. This should include for the migration of those services providing public and social purposes, including community radio and RSLs, in an affordable and realistic fashion. It should also include for the migration of those listeners least likely to be able to switch to digital platforms without help.

Proposal 6
"The characteristics of community radio, based around social gain provided by stations on a not-for-profit basis remain key. However, there may be an argument for simplifying the statutory selection criteria, and the regulation of funding and ownership without losing the essence of what community radio has been set up to achieve."

9.   In general terms, we are concerned that the suggestions within this proposal concentrate on "inputs" (application criteria, funding sources, etc) rather than addressing issues of reporting, social impact and evaluation within the community radio sector. The success of the community radio sector, young though it is, is due to the achievements of licensees, applicants and many others involved in projects across the country. We feel that concentrating more on what the sector actually does – rather than what it says it will do – will allow Ofcom to more effectively regulate the sector, whilst also enabling the sector to grow and develop directly according to the needs of those people it is serving. With this general opinion in mind, we offer the following specific comments on the proposal.

10.   We welcome and support the retention of the key characteristics of community radio and the assertion that social gain should remain the key function of community radio. We broadly support the suggestions to re-define "social gain", in as much as we agree that several of the existing selection criteria could be usefully combined into a wider but less prescriptive social gain criterion.

11.   We support the suggestion that Ofcom should consider the ability of an applicant to maintain a community radio service for the first year, rather than require projections for a full five years of a licence period, which have rightly been identified as difficult to accurately predict.

12.   Whilst the "50% rule" is unpopular in some quarters within the community radio sector, we feel that it is useful not only in ensuring that no one body has undue editorial influence but also in encouraging licensees to develop a broad, sustainable funding base from a number of sources. That said, we feel that a method of regulation that takes account of the output of a community radio licensee (including consideration of the independence of editorial content), rather than concentrating on funding sources, would be more effective. If the limit is to remain, then we welcome the suggestion that volunteer time be taken into account when assessing the turnover of a community radio station.

13. Our experience shows that there is much to be gained where community radio stations work in co-operation, and we therefore support the suggestion that this may, in some cases, result in a body corporate holding more than one community radio licence. That said, we feel that it is important that this suggestion is coupled with rigorous monitoring of the true involvement of local communities in the ownership, management and operation of a community radio station.

14. We are keen to see Ofcom begin its work on gathering and analysing feedback on the performance of community radio stations. We feel that it is very important to ensure that this process – examining the outputs of stations in terms of programming, social gain and community impact evaluation – is used to inform future licensing decisions, and that licensees are held to account to ensure that they deliver on the proposals by which they obtain licenses.

15. With regard to the extension or re-licensing of community radio stations, we re-iterate our view outlined in paragraphs 4-8, above, that any decisions relating to migration away from analogue platforms must be taken with due regard of the technical, financial and human-resource capacity of small community radio broadcasters.