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Community Radio: Collaboration and Regulation

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ABSTRACT: Community Radio: Collaboration and Regulation.

Over the past decade, the UK community radio sector has grown from a handful of experimental broadcasters to encompass a diverse range of some 200 services. By comparison with other types of broadcast radio in the UK, these services are heavily regulated with a variety of requirements being places upon their structures, inputs, processes and outputs.

The process by which community radio regulation was developed has underpinned its subsequent acceptance by the sector. Most importantly, current UK community radio regulation was developed in conjunction with representatives of the sector and the fifteen experimental stations launched in 2001 / 2002.

The paper considers the relatively 'light touch' regulation of the country's commercial radio sector and the ways in which the new 'Third Tier' impacts on existing mainstream providers, in particular the BBC.

It also poses the argument that the recent change in direction for BBC Local Radio might place that service at risk as the community stations more fully realise Frank Gillard's vision for local radio in the 1960s. There will be an evaluation of the potential threat community radio poses to BBC Local Radio, and asks what, if anything, needs to happen to enable the two to comfortably co-exist.

The authors conclude by setting out some of the likely developments within broadcast radio over the short to medium term and examine how legislation and regulation may change as a result and possibly influence the future development of the UK community radio sector.

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1. Introduction

For community radio supporters in the United Kingdom, the past decade has been one of tremendous change. Despite many years of campaigning, back at the turn of the century the UK remained a country within which there was no legal provision for the operation of full-time community radio services. Today, by comparison, just a few short years later, a thriving community radio sector exists, with over one hundred and sixty services already broadcasting. A further sixty plus stations are currently preparing to take to the air and more are expected to be licensed throughout the first few months of 2010.

Since 2001, the process of legislative and regulatory change has seen the launch of initial temporary experimental services followed by the introduction of specific permanent legislation and two rounds of licensing; the latter expected to be completed by mid 2010. A key part of this process has been a high degree of collaboration between the sector and its regulator, the Office of Communications (Ofcom). Indeed, one of the authors of this paper is an example of such collaboration. Having worked for the Community Media Association (CMA) when the initial experimental licences were offered and subsequently implemented, he then 'crossed the divide' and went on to work for Ofcom from 2004, contributing to the development and operation of the permanent licensing system, which remains in operation today.

By comparison with commercial radio stations, community radio services in the United Kingdom are heavily regulated. The terms of the Community Radio Order 2004 (CRO 2004) (HM Government, 2004) build upon the requirements of Section 105 of the 1990 Broadcasting Act (BA 1990) (HM Government 1990), which itself sets out what Ofcom has to consider when assessing applications for commercial radio licences. The CRO 2004 requires Ofcom also to consider additional factors such as an applicant's ability to deliver 'Social Gain' (community benefits), ensure accountability and provide access to facilities. Community radio broadcasters in other jurisdictions would no doubt recognise the underlying principles, indeed much of the basis of UK legislation draws on the prior experience in other countries, many of which have a considerably longer history and greater experience of community radio broadcasting.

As a result of such circumstances, when developing UK community radio policy, legislators and regulators were able to draw upon a wide range of existing external practice and expertise to help inform their approach. Equally importantly, current UK community radio legislation and regulation has been developed in close collaboration with representatives of the sector (in particular the CMA) and, perhaps equally importantly, the fifteen original full-time experimental stations, which launched from 2002.

Inevitably, some legislative and regulatory issues have, to a greater or lesser extent, elements that are specific to UK circumstances. For example, it is not surprising that both the UK's public service radio broadcaster (PSRB), the BBC, and

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the country's commercial broadcasters each have their own priorities, which are often at odds with those of community radio broadcasters. Thus, just as their equivalents do in other jurisdictions, from a legislative and regulatory perspective, the UK Government and Ofcom have to balance the demands of the new community sector against those of existing PSRB and commercial radio operators. Despite what the authors would argue has evolved into a largely fruitful and effective regulatory relationship, it is the issues of resource availability and allocation (for example in relation to frequencies or finances) which are most often at the root of those disagreements which do still arise between the regulator and the regulated.

2. Pre-history

The campaign for the introduction of community radio in the United Kingdom dates back several decades. As long ago as the early 1960s, the BBC's then Director of Radio, Frank Gillard, managed to persuade the corporation to carry out a number of experiments in local radio (Lewis & Booth, 1989: 86). Although these experiments were not actually broadcast, they did contain a much higher degree of community focus and involvement than has typically recently been the case in respect of the provision of both BBC and commercial local radio. Arguably, many elements of these early PSRB experiments would today find themselves to be far more at home on community radio than as part of present day BBC local radio.

Although for technical reasons many of the earliest BBC broadcasts were of local rather than national radio, the formal introduction of local PSRB and commercial radio did not happen in the UK until the late 1960s and early 1970s respectively (*ibid.*). According to Lewis and Booth, the twin drivers of campaigning for community radio were:

*... aimed at the reform of existing broadcasting structures and practice and at opening up a space for autonomous, locally-controlled stations (*ibid.*, 105).*

Campaigning bodies including COMCOM and the Local Radio Workshop were set up in the late 1970s, and in 1983 these effectively coalesced into the Community Radio Association (CRA) the forerunner of today's Community Media Association (CMA). In parallel, a new generation of land-based 'pirate' stations emerged, some of which espoused clear community broadcasting objectives, this despite the inevitable limitations caused by their unlicensed position. The bridge between these stations and the political lobby for community radio was a short-lived campaign known as 'Free the Airwaves' which took place during 1986 and which involved both the broadcast of promotional messages supporting the licensing of community radio and the short-term jamming of some commercial radio stations.

Despite the ambiguous relationship between the CRA and pirate broadcasters (Barbrook, 1992) it was arguably this combined 'pincer movement' of both campaigning and law-breaking that led to proposals for a community radio experiment being accepted by the Thatcher Conservative Government in 1985.

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However, an impending General Election put paid to these plans and it was not until 1989 that the then broadcasting regulator, the Independent Broadcasting Authority (IBA), took the first tentative steps towards the introduction of full-time community radio services with the introduction of a tier of smaller radio stations which were operated under what became known as 'Incremental Radio' licences. In order to meet the requirements of broadcasting legislation in place at the time (the Sound Broadcasting Act 1972) (HM Government, 1972), these relatively small-scale services were introduced only into areas which were already served by existing local radio services. In addition, they were required to provide output that was complementary to that of the established local radio tier, such as specialist music formats or programming intended to serve a specific section of the community. Clearly, the IBA was trying to strike a balance between the demands of the community radio lobby for access to the airwaves whilst, at the same time, seeking to minimise the impacts that such services might have on its existing station operators.

Twenty-one of these relatively small-scale services were licensed. Several were operated by ex-pirates, and several, including WEAR FM in Sunderland, Mellow 1557 in rural Essex, FTP (For the People) in Bristol, and Spectrum Radio in London, adhered to clear community radio principles. However, despite the alternative ideals behind such stations, they were each required to operate under legislation intended for the delivery of commercial broadcasting and, not surprisingly therefore, this legislation made no provisions to ensure and protect the long-term adherence to elements such as not-for-profit operation or community ownership and control. Thus, commercial pressures took their toll and:

What had begun as an exciting attempt to free up the airwaves, to enable them to carry the full range of values, tastes and opinions that shape our society, ended in an increase of stations sounding virtually indistinguishable from one another. (Crissell, 1997: 216).

Although subsequent legislation in the form of the Broadcasting Act 1990 did not provide for the introduction of full-time community radio services, it did make permanent an existing system for the provision of temporary short-term broadcasting licenses and long-term very low-power services for closed establishments such as hospitals and universities. Short and long-term 'Restricted Service Licences' (RSLs) replaced and enhanced the systems of short-term 'Special Event Radio' licensing and longer-term hospital and student radio licensing, which had hitherto been operated directly by the Home Office. Even before permanent community radio licenses were available, RSL licenses were used as a form of trial community service, often using a particular local event or activity as the justification for such broadcasts. A large number of those stations which have been licensed as full-time community radio services since 2004 have a history of RSL broadcasting and, despite the increasing number of such permanent community stations, interest in the use of short-term RSL licenses continues unabated, with around 500 temporary broadcasts taking place each year in various locations across the UK.

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3. The Access Radio Experiment

Following the change of government in 1997, pressure for the introduction of community radio continued. Perhaps because it was not burdened by such close ties to the commercial radio sector as its Conservative predecessors, or indeed the same 'baggage of history' concerning previous attempts at legislative change, the new Labour government soon indicated that it would support the introduction of such services. Signs of progress were becoming obvious by 1999, when the CMA was invited to make contributions to a joint Radiocommunications Agency, BBC and Radio Authority investigation into options for re-planning the FM (Band II) spectrum, carried out by Aegis Systems Limited (Rudd *et al.* 2000).¹ This report examined options for the introduction of additional FM stations in urban areas such as Leeds and London, specifically considering the potential for launching small-scale community-based services. At around the same time the Radio Authority, as the then regulator responsible for all UK non-BBC radio broadcasting, began to develop plans for the introduction of a limited number of experimental 'Access Radio' stations with which it intended to develop the concept and structures of community radio in a UK context.

The term 'Access Radio' was in fact an early bone of contention between the Radio Authority and long-term campaigners for community radio. The CMA and others argued that the term 'Access Radio' already had a specific meaning internationally (related to open access stations) and that the Radio Authority simply did not wish to admit that it was finally introducing a tier of radio of which it had historically been less than supportive.

Such minor spats aside, from the outset, the Radio Authority made a point of liaising with the Community Media Association in relation to the development of its plans. An early concrete example of this was the authority's organising of a one day seminar in February 2001 billed as a "**great debate on third tier of radio services**" it included no fewer than three speakers from the CMA and heard contributions from the floor by others and from a number of prospective community broadcasters (Radio Authority 2001 & 2001a). An invitation for expressions of interest in applying for what would be know as 'Access Radio' licences was issued by the authority in May 2001 with the intention of selecting a diverse range of services with differing objectives, structures and funding models (Radio Authority, 2001b). In early August 2001, the Radio Authority announced that it was inviting fifteen groups to make formal applications for licenses:

The fifteen groups reflect all four of the home nations, rural and urban areas, including links with urban regeneration projects, services for ethnic minorities in the Asian and Afro-Caribbean communities, a wide range of age groups from children to older people, Christian based stations, and a range of financial models. The maximum length of

¹ In 1999 / 2000, co-author of this paper, Lawrie Hallett, attended various meetings in relation to this project on behalf of the Community Media Association.

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licences to be offered is twelve months, but some services propose shorter durations. Others propose the sharing of frequencies or shared administration, some intend to broadcast for only part of the day or week, some services will broadcast on AM and some on FM. Broadcast wavebands are still to be determined for a number of these services, as well as the clearance of suitable frequencies (Radio Authority 2001c).

The majority of the pilot groups had been members of the CMA prior to applying for their experimental licences, those not connected with the organisation all chose to join soon after their licences were awarded, such that all fifteen groups were members of the CMA from 2002. A number of meetings were held between the Radio Authority, the CMA and the various Access Radio pilot stations throughout the experimental period. For example, the various parties spent all day on September the 11th 2001 in a planning meeting hosted by the CMA in Sheffield, oblivious to the momentous occurrences taking place in New York and elsewhere in the United States.²

At around this time, the CMA made its own contribution to the debate about the eventual nature of the forthcoming UK community radio sector. It commissioned and published a comparative analysis of community radio in six other jurisdictions (Australia, Canada, France, Holland (The Netherlands), Ireland, and South Africa) (Price-Davies & Tacchi, 2001). This report made a number of concrete recommendations, several of which found their way into the eventual community radio enabling legislation, the CRO 2004.

Once the various Access Radio pilot projects began to come on air in 2002, liaison between the Radio Authority and CMA continued and in some respects increased. The Radio Authority appointed Professor Anthony Everitt to assess the activities of the various pilot stations (Radio Authority 2001d). Everitt visited the various stations on an individual basis, but it was the CMA that typically provided facilities when the various stations met together, often with the assessor and staff of the Radio Authority also present.

4. The Community Radio Order

Although the original intention had been to operate the Access Radio experiment for a one-year period, the original licences were extended on more than one occasion with most of the trial stations receiving full-time Community Radio Licences in 2006.³ There were two main reasons for the extensions. Firstly, the thorough nature of Professor Everitt's analysis of the experiment took somewhat longer than expected, leading to the publication of two reports (Everitt 2003 & 2003a), rather than one as had originally been intended. Secondly, the introduction of permanent enabling legislation, The CRO 2004, took longer than

² Co-author of this paper, Lawrie Hallett, was present at this meeting.

³ One of the original Access Radio pilot stations, 'Shine FM' in Northern Ireland had specifically applied for a six month experimental licence and on this basis was not granted an extension to its original licence. However, after a period off-air, the station applied for and received a new Community Radio Licence and recommenced broadcasting in June 2007.

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expected to finalise. Given the complimentary nature of the Everitt reports, which suggested that the experimental stations were working well, both the Radio Authority and its successor, Ofcom, took the pragmatic view that there was little to be gained by terminating licences. Clearly, the thinking behind such pragmatism was that the only effect of such a move would have been for the experimental groups to lose momentum whilst off-air and waiting to apply for subsequent full-time permanent licences.

Various parties contributed to the final makeup of the CRO 2004. After in its White Paper consultation 'A New Future for Communications' was published in December 2000, the Government invited "**views on extending the diversity of radio service through 'Access Radio'**" and on "**whether the benefits of community radio would justify greater public intervention**" (DCMS / DTI, 2000: 39 & 40).

The Radio Authority set out its underlying thoughts in a document entitled 'Access Radio: Submission by the Radio Authority to DCMS [Department for Culture Media & Sport] / DTI [Department of Trade & Industry]' (Radio Authority 2001e). This response was one of many contributions to the debate, with others coming from the CMA and prospective community broadcasters as well as other interested parties, such as the commercial radio sector.

Acting on the various responses received, the UK Government created section 262 of the Communications Act 2003, which provided powers for the introduction, under secondary legislation, of radio services that would:

...be provided primarily for the good of members of the public or of a particular community, rather than for commercial reasons; and... [which] ...would confer, significant benefits on the public or on the communities for which they are provided (HM Government, 2003: Section 262(2) a & b).

With such enabling legislation in place, thereafter, attention focused on the creation of the required secondary legislation, the Community Radio Order, 2004. A further formal consultation process took place between the 10th of February and the 20th of April 2004, before this legislation was finalised by the DCMS. During early 2004, the consultation phase over the eventual wording of the CRO did indeed lead to changes, some of which were not welcomed by the community radio sector. Early drafts of the order provided protection for small-scale commercial broadcasters that it was felt might be financially damaged by the introduction of competing community radio services. However, the commercial radio sector body, the Commercial Radio Companies Association (CRCA) (now known as The Radio Centre) felt that such protection was inadequate and was successful in lobbying for change.

Whereas an early draft of the CRO, published prior to the 2004 consultation, simply stated:

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A community radio licence shall include such conditions (if any) as appear to OFCOM to be appropriate for securing that the sale of advertising and sponsorship in connection with the service provided under that licence does not unduly prejudice the economic viability of any other local sound broadcasting service. (DCMS, 2004: 6).

By comparison, the final version of the CRO included far more concrete restrictions, viz:

(a) OFCOM shall not grant a licence to provide a community radio service in any case where the licence, if granted, would overlap with another local licence for a service, other than a community radio service, the potential audience of which includes no more than 50,000 persons who have attained the age of 15 years;

(b) every licence to provide a community radio service that overlaps with any other local licence the potential audience of which includes more than 50,000 persons who have attained the age of 15 years, but no more than 150,000 such persons, must contain such conditions as appear to OFCOM to be appropriate for prohibiting -

(i) the inclusion in that service of any remunerated advertisement, and (ii) the sponsorship of any programmes included in that service... (HM Government, 2004: 7).

Although the above restrictions have had only a relatively minor impact on the emergence of community radio in the UK as a whole, they have of course impacted severely on the activities of individual community stations. Early in 2009, Ofcom's annual report into the activities of the community radio sector stated that some sixteen stations were prevented from generating any income from on-air commercial activities, with a further two being restricted to a lower percentage of income from such sources (in one case 15%, in the other 25%) (Ofcom, 2009: 1). Of course, the impact of the first of the two restrictions referred to above is less easy to quantify, but the authors are aware of at least two active community radio groups that are currently prevented from holding a licence because of the presence of a very small-scale commercial broadcasters overlapping their proposed broadcasting areas.

Although the commercial radio sector was successful in enhancing protection for its operators in 2004, now, several years later, certain elements of these restrictions are being reconsidered. During 2009, the DCMS undertook a public consultation to decide whether or not to remove the restriction which prevents Ofcom from licensing community radio services in areas where a commercial station broadcasts to fewer than 50,000 adults (aged 15+). It stated that:

The recent John Myers report, "An Independent Review of the Rules Governing Local Content on Commercial Radio", commissioned by Government as part of the DBR, recommended that this restriction be

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lifted. Therefore, we are seeking views on lifting the rule prohibiting a community radio station from being licensed if it would overlap with an existing local radio service for which the MCA contains no more than 50,000 adults.

The Myers review also recommended that, should this restriction be lifted, the advertising and sponsorship restriction should then be applied all community radio stations that overlap with local radio services of up to 150,000 adults. We also seek views on this. (DCMS, 2009: 5).

Following its consultation, the DCMS sponsored additional secondary legislation, submitted to Parliament in November 2009. At the time of writing, the 'Community Radio (Amendment) Order 2010' (DCMS 2009a) was still being considered by Parliament, however, it would seem likely that the restrictions on licensing Community Radio services which would compete with very small-scale commercial stations will indeed be rescinded. The mere fact that such changes are under consideration suggests that the influence of the community radio sector, or at least its ability to make its voice heard, is, to some extent, beginning to increase.

5. The Licensing Process

The DCMS consultation on the form of the CRO 2004, was carried out in parallel with a related Ofcom consultation 'The Licensing of Community Radio' which ran between the 17th of February and the 20th of April 2004 (Ofcom 2004). This consultation was based on the approach of keeping ***"the regulation of stations to the minimum necessary"*** (*ibid.*, 4) and invited responses to a total of eleven specific questions about the future licensing of community radio in the UK. The various questions were, between them, wide-ranging, covering issues such as spectrum allocation, the development of an applicant-led application process and conformance with licence requirements (*ibid.*, 10 - 20).

Following the above consultation, and the publication of the CRO 2004 in July of that year, Ofcom published its statement 'Licensing Community Radio' approximately a month later (Ofcom 2004a). This statement set out a ***"strategy for the introduction of community radio in the UK, and the process by which licences will be advertised, awarded and regulated"***. It stated that one of the factors which influenced the development of community radio policy was the ***"139 responses to the public consultation which was conducted by Ofcom"*** earlier in the year.

Partly as a result of the consultation summarised above, the licensing of community radio services is approached by Ofcom in a way that is markedly different from that taken in relation to commercial radio broadcasting. A fundamental difference relates to the way in which licence areas are defined. Although Ofcom is not currently inviting applications for commercial radio licences, when it does so, these are offered to serve a specific location, one that is

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defined in advance by the regulator. By comparison, although Ofcom limits the size of geographical coverage that can be achieved by a community radio service, other than highlighting areas where it considers that no suitable frequencies are available, it does not define the location of community radio services in advance. The principle behind this approach is to allow community groups to define their own communities rather than try to fit within pre-defined allocations made by outside bureaucrats.

When Ofcom began the process of licensing community radio stations in 2004, it expected *"to licence anything up to 50 services in 2004 / 2005"* (Ofcom, 2004b: 3). However, by the time the first licensing round was finally complete in early 2006 (running between November 2004 and May 2006), the number of licensed services was in fact 107 (Ofcom, 2006), a total which clearly exceeded earlier expectations. Recognising the high levels of demand for community radio services, even before the first round of licensing was completed in May 2006, Ofcom had already invited 'expressions of interest' for a second round of licensing, receiving some 184 responses by the closing date of Friday 21st April 2006 (*ibid.*).

At the time of writing, the second round of community radio licensing in the UK remains ongoing. Although all of the regional application deadlines have now passed, various applications from the South East of England have still to be considered alongside all of the thirty or so applications received for services within the London area (inside the M25 orbital motorway). To date, the number of licences offered in the second round has exactly doubled the final total (of 107) awarded during the first round. With the London area still to be considered, it is therefore almost inevitable that the total number of community radio services licensed in round two will be greater than the total for round one. Speaking to the Radio 3.0 Conference in London during May 2009, the Chief Executive of Ofcom, Ed Richards, described the demand for community radio licenses as *"insatiable"* (Guardian Newspaper, 2009). Although no formal plans have yet been published for a third round of community radio licensing, the general expectation within the sector seems to be that, frequency resource issues aside, the process will continue at some point during late 2010 or early 2011. The most likely possible approach is that any new licensing round will begin as the previous one did, with a further invitation for groups to submit expressions of interest to the regulator in relation to their specific broadcasting objectives.

A further difference between the licensing approaches taken for commercial and community radio is the degree of assistance provided by the regulator to prospective applicant groups. Whereas commercial radio applicants tend to be well financed and thus able to draw upon professional consultants to put together their bids, community groups are, almost always, less well resourced. A clear example of collaboration between the regulator and the sector is the operation of joint licensing events at which representatives of Ofcom, the CMA, and, on occasion, existing licensed community radio broadcasters give the benefits of their various expertise and experience to prospective applicant groups. Such events are held on an irregular basis, usually several weeks in advance of the relevant application closing date. They may be held at third-party locations, at the CMA

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base in Sheffield or at Ofcom offices in London or other UK locations such as Belfast, Cardiff and Glasgow.

Such events are usually attended by representatives of between fifteen and twenty-five different groups, taking place over a single day. They include information about the application process, the Ofcom application form, and how to complete it, as well as advice on technical issues such as transmitter site planning and conformance with the engineering code. It should be noted that there is no obligation on the part of Ofcom to provide such a service as it is not mandated by the terms of the CRO 2004. However, despite the fact that these events often draw together a very diverse group of applicants who are sometimes in competition for limited frequency resources, there is no doubt that they remain popular and helpful to applicant groups. For example, Andrew David, the Managing Editor at Siren FM in Lincoln is of the view that:

Pre-licensing workshops and close discussions with Ofcom were instrumental in helping us develop a thorough knowledge of what was required by the legislation and to put appropriate structures and systems into place so as to ensure these would be met.⁴

6. Subsequent Consultations

In the few years since its initial introduction, the development of Ofcom's community radio policy has been peppered with public consultations. This approach is partly a function of requirements placed upon Ofcom by the terms of the Communications Act 2003, which states that:

It shall be the duty of OFCOM to establish and maintain effective arrangements for consultation about the carrying out of their functions... (HM Government, 2003: Section 16 (1)).

However, the approach is arguably also a function of the relationship between the regulator and the community radio sector, where formal consultations form only part of a wider dialogue. In addition to providing advice to prospective community radio broadcasters as previously referred to above, Ofcom members of staff also regularly attend community radio events, such as conferences and workshops, organised, for example, by the CMA or individual universities with an interest in community media. Several times each year, representatives of the CMA and Ofcom meet to discuss informally the various issues that arise in relation to the operation of individual community radio stations as well as matters of concern to the sector as a whole.

On an irregular basis, and subject to time constraints etc., Ofcom staff also visit individual community radio stations and discuss their various concerns and plans

⁴ Personal correspondence between the authors and Andrew David, Managing Editor, Siren FM, (December 2009).

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for the future. On a more day-to-day basis, Ofcom's community radio team is contactable both by telephone and via e-mail, the department having set up a specific enquiry e-mail address which is used by community broadcasters, prospective broadcasters and members of the public alike. Individual applicant groups, as well as academic researchers into community radio, are also able to arrange meetings with members of Ofcom's Community Radio Team. Applicant groups are not given coaching as to how to complete their applications, but they may be advised as to where they might obtain third-party advice on specific elements of their application.

Thus in some of the example consultations examined in greater detail, below, the process of developing the formal consultation includes inputs not just from Ofcom, but also from other interested parties, such as the CMA and individual community radio stations. The community radio sector is therefore involved not just in contributing to published consultations, but also earlier in developing the content of such consultations as these coalesce into their final form prior to publication.

The Community Radio Fund

As well as containing the initial enabling legislation permitting the establishment of community radio services, the Communications Act 2003 also made provision for the operation of a Community Radio Fund, stating that Ofcom:

... may make such grants as they consider appropriate to the provider of any service of a description of service in relation to which provision is for the time being in force under section 262 [community radio services]. (HM Government 2003, Section 359 (1)).

The DCMS currently provides up to UK £500,000 each year to be distributed for the operation of community radio services, an amount which has not been increased since the first community radio services were introduced in early 2005. Obviously, divided by the 160 or so community radio services already on-air this funding would be relatively insignificant for each station. Early on, the limitations of the available funding were apparent, and between January and March 2005, Ofcom carried out "***A public consultation on the management and administration of a Community Radio Fund***" (Ofcom, 2005). Proposing a 'light touch' approach to the operation of the fund, this consultation also suggested that "***that one member of the grant-awarding Panel should be appointed from the Community Media Association, which already has experience of awarding grants in this sector***" (*ibid.*, 1). This suggestion, exemplifying the degree to which close cooperation between the regulator and the sector support body had already become established by 2005, was accepted and today the CMA remains involved in operation of the Community Radio Fund.

The main criticism of the Community Radio Fund remains its small size. Although Ofcom is not responsible for deciding the amount of money available to the fund, merely administering resources provided by Central Government, it is becoming increasingly aware that the resource limitations of the fund are hindering its ability to help nurture new community radio services. The Community Radio Fund

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Panel produces annual reports about its work, and in the 2008 report, the panel notes Ofcom's comments in a published letter to the DCMS Minister responsible for the fund that ***"that a number of worthwhile applicants [for financial support] were rejected due to a lack of available funds"*** (Ofcom, 2008: 2). For its own part, the panel stated that it ***"continues to believe that it cannot fulfil its remit effectively unless the size of the fund is increased"*** (*ibid.*).

To date, Ofcom has not been particularly vocal in its support for an expanded Community Radio Fund, but pressure from the sector will doubtless increase as the number of stations broadcasting gets larger and the chances of receiving support from the fund are reduced accordingly. Of course, the current financial climate in general, and Government funding limitations in particular, do not bode well for a substantial increase in the size of the fund in the immediate future and it remains to be seen if and to what degree Ofcom may decide to become more pro-active in this area.

Volunteering

When the first community radio groups sought licences from Ofcom, the regulator's position of the value of volunteer inputs was that this value could not be taken into account when assessing a group's financial proposals. More importantly, the value of volunteer inputs was not counted as part of a station's total annual turnover.

The sector was uncomfortable with this position because the UK's community radio legislation currently places limits on the percentages of total annual income that a station can obtain from a single source. Specifically, the CRO 2004 limits income from any one source to a maximum of 50% of total annual station turnover. In the case of on-air commercial revenues, for the majority of community radio stations, the total value of paid for spot-advertising and sponsorship opportunities, taken together, may also not be more than 50% of annual station turnover.

Although the above limit can currently never be more than 50% of total annual turnover, in some cases the figure may be lower. Lower percentages are implemented if Ofcom considers that the commercial operations of a particular community radio station may seriously damage the viability of a small-scale commercial station operating in the same area. In addition, where very small commercial stations serving fewer than 150,000 adults (aged 15+) exist, the terms of the CRO 2004 require that Ofcom must prevent community stations in the same areas from generating any income at all from on-air commercial activities.

In light of concerns from the sector, in early 2007, as part of its wider 'Future of Radio Consultation (Ofcom 2007)', which included a complete chapter devoted to issues concerning the future development of community radio, the regulator proposed changes in relation to the value of volunteer inputs. Noting that:

In the voluntary sector, it is often the case that a monetary value is attached to volunteer time. The value of such volunteer inputs may then be used as 'matched funding' against which grants are awarded.

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The Community Media Association carried out a survey of a number of its member organisations (some already broadcasting, others not) towards the end of 2006. Although analysis of data was still being carried out at the time of writing (February 2007), the CMA cautiously estimates the average value of such volunteer inputs for a station to be in the region of £75,000 per year, (range £7,000 to £201,000) (Ofcom, 2007: 141).

The regulator went on to suggest that:

It would be possible to take into account volunteer time when assessing the turnover of a community radio service. Ofcom welcomes views on this issue and on how the value of such input could be calculated (ibid.).

After receiving various responses to the consultation addressing the issue of volunteer inputs, Ofcom published its response in its statement and further consultation 'The Future of Radio - The Next Phase', published towards the end of 2007. Although there was considerable support for the idea of recognising the value of volunteer inputs, such support was not universal. The Radio Centre (the UK sector support body for commercial broadcasters) took the view that such a scheme ***"could prove a time-consuming distraction and that it is not appropriate to use a back-door method to deliver changes to community radio's funding"*** (Ofcom, 2007a: 90). Ofcom's response to this suggestion was surprisingly blunt, stating simply:

We do not agree with the view that this proposal could be a back-door method of delivering changes to community radio funding. Our intention is to recognise the value of volunteer inputs which are a key requirement of community radio services and without which they would not be able to operate. Taking into account the financial value of such inputs would bring Ofcom's regulatory approach broadly in line with recognised common practice in the wider, not-for-profit, sector (ibid.).

Here again we see an example of the gradually increasing understanding by Ofcom of the practices and objectives of the community sector. Some months after the above statement was published, the regulator went on to introduce guidelines for the recognition of the value of volunteer inputs. In 'Community Radio: Volunteer Input - Guidelines for community radio stations that wish to use volunteer time as part of station turnover', it stated that following the previous year's consultation and statement:

Ofcom has held discussions with representatives of the community radio sector, including the Community Media Association and a number of community radio station operators. Our aim has been to draw up guidelines covering volunteer inputs used by the community radio sector (Ofcom, 2008a: 1).

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The result of these discussions was the introduction of a voluntary scheme, active from the financial year April 2008 to March 2009. The scheme linked volunteer rates to the rates of pay used by the European Social Fund, with which some community radio services were already familiar. Reporting requirements for the scheme are minimal:

Stations are asked to provide a simple spreadsheet of hours claimed in either one or two value categories. This spreadsheet should include the number of volunteers involved, the number of hours claimed and the nominal value of any such claims (ibid., 3).

With the regulator stressing that:

There is no requirement for community radio stations to count volunteer inputs as part of their turnover, but for those that wish to do so, these guidelines apply (ibid., 1).

The original reason why the sector called for volunteer inputs to be included as part of operational turn-over was because, on a station-by-station basis, such a move would potentially allow a ***“greater sum of money to be provided from one source”*** (ibid., 1). This situation arises because the terms of the CRO 2004 place limits on the percentage of total income that can be obtained from a single source (including on-air commercial funding where permitted). Because these limits are expressed in terms of percentages, it follows that if a value for volunteer inputs is included in total station turnover any percentage limit will thus represent a greater monetary value than would otherwise be the case. However, in reality, such limits have so far proven to be of relevance only to a very small number of stations. According to Ofcom’s first Annual Report on the Community Radio Sector, very few stations reached the point with their funding that the single source limits risked being breached (Ofcom, 2009: 11). However, a further reason for recording the value of volunteer inputs is that doing so enables community radio operators to provide concrete evidence of community involvement, not just to Ofcom but also to other community groups and potential financial and material supporters of their various services.

7. Relationships with the BBC

Radio Joint Audience Research Ltd (RAJAR) ⁵, is responsible for measuring radio audiences (of both national and local stations) across the UK. It does this by carrying out quarterly (diary-based) listener surveys, which currently measure the audiences of approximately 340 individual stations. Although most of these are commercial stations, the diary research also covers 60 BBC stations,⁶ but effectively excludes any measurement of Community Radio services. Some survey

⁵ www.rajar.co.uk Established 1992 as a single audience measurement system for the radio industry, including the BBC, UK licensed and other commercial stations. [accessed 30 June 2009]

⁶ www.rajar.co.uk/content.php?page=about_key_facts [accessed 30 June 2009]

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information, such as weekly reach and hours per station is placed in the public domain. However, more detailed data, such as the listenership figures for individual programmes, is made available only to subscribers.

According to RAJAR's latest rate card, were a Community Radio station to apply to be included in the survey, it would cost them £7,850 per year plus VAT.⁷ Such outlay is probably not realistic for stations operating on a not-for-profit basis, often existing primarily on the goodwill of volunteers, supported by small-scale fund-raising and grants, which are often obtained only after completion of long and onerous application processes. However, such costs are a moot point. As it stands, RAJAR states its sampling methods are inappropriate for small-scale stations, as it is "... **unlikely to be able to provide sufficient sample for stations with TSAs (target survey areas) below 30,000.**"⁸ Thus, where the ratings of a radio station are deemed a key measure of success (for example, by advertising agencies and media buyers), the community radio sector is unlikely to be able to challenge any of the mainstream providers. Not that, overall, it is in any great hurry to do so. Whilst for commercial stations the ability to generate advertising revenues is linked to maximising listening figures and BBC Local Radio stations need to prove they have sufficient listeners to justify their portion of the licence fee, for Community Radio many of its objectives, such as the delivery of 'social gain', are not necessarily directly dependent upon raw audience levels.

The delivery of 'social gain', or community benefits, can be as much about what takes place off-air as it is about the contents of Community Radio programming. Those at the forefront of the Community Media movement focus on the nature of the relationship that a community radio station has with its audience. For example, the Director of Manchester's Radio Regen,⁹ Phil Korbel, considers "... **the quality of engagement**" (Korbel, 2006) to be key. In his view, community stations should be vehicles for community outreach:

Community Radio stations don't always have the biggest audience but the audience they do have should feel ownership of the stations and is therefore more likely to act on what they say than most other media outlets (ibid.)

The unique nature of community radio is that it provides benefits for both participants and listeners. With this fundamental tenet in mind, Korbel's attitude is to say: "**Don't be popular, be necessary.**" (ibid.)

So, based on the above, how much of a threat could community radio pose to the future of BBC Local Radio in particular?

To take a specific example, Siren FM; a full-time licensed community radio station based at the University of Lincoln was launched in August 2007. The station serves

⁷ www.rajar.co.uk/docs/station_ratecard_2009.doc [accessed 30 June 2009]

⁸ www.ofcom.org.uk/consult/condocs/comm_radio/com_radio/p_e_sum/ [accessed 30 June 2009]

⁹ Radio Regen is a Manchester based charity that seeks to help communities to combat disadvantage through the use of community radio.

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the greater Lincoln area and its target audience is defined as the young people and communities of Lincoln. It also pays particular attention to the needs of the more isolated young people in the area, as well as groups which are not served by the existing radio providers in the region; for example Russian and Arabic speaking residents and the local LGBT community.

When Siren FM was in its planning stages, a conscious decision was taken by the launch team not to take on-air spot advertising. This approach was intended to ensure that the new service would not pose any direct financial challenge to the local commercial radio station, Lincs FM. The broader underlying proposition was to develop a new Community Radio service that could co-exist in a collegiate atmosphere with both the local commercial radio station, Lincs FM, and with the BBC Local station, BBC Lincolnshire. Taking this idea further, when Siren FM's Advisory Board was established, its membership included two representatives from these local broadcasters; specifically the Director of Programming for the Lincs FM Group and the Managing Editor of BBC Lincolnshire. Whilst this open approach was intended primarily to encourage support where appropriate from the new station's radio neighbours, it would also ensure that any activities by Siren FM that might adversely affect either of the two larger, mainstream, stations could be easily picked up at the quarterly Advisory Board meetings hosted by the community station.

However, even this degree of planning does not always guarantee that relationships between Lincoln's mainstream and community broadcasters run smoothly. For example, when the City hosts its Christmas Market in early December every year, it is the biggest annual event staged there. The small cathedral city is swamped with visitors, both domestic and international. Over four days, coaches and trains bring nearly a quarter of a million shoppers to the largest Christmas Market in Europe. Travel for the event proves problematic not only for the large number of visitors to the Market, but also for local residents. As the only radio station providing coverage focused solely on the city, Siren FM took the decision to run regular travel updates throughout the four days of the event, utilising the production and presentation skills of the 'on loan' BBC SBJ (Senior Broadcast Journalist) with the full support of the relevant Head of Regional and Local Programmes (HRLP). The local council was pleased with the service the station offered and, to help maximise impact, its temporary road signs, erected along the City's incoming roads, directed drivers to the community station's FM frequency, which is only audible for a radius of a few miles around the city centre. Previously, the plans for coverage of the Christmas Market had been discussed at Advisory Group meetings such that the other local stations were well aware of what would be happening. Given this early notification and the fact that the BBC's own 2010 local radio research (Parkinson, 2008) downgrades the importance of travel news in its output, putting it at 19th position in the ranking importance of station qualities, Siren FM's Managing Editor was surprised to receive communication from BBC Lincolnshire's Managing Editor, Charlie Partridge that stated:

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*I was shocked this morning to see Siren FM's travel service advertised on every road in Lincoln on one of the biggest weekends of the county's year. [] It had never entered my head ... that your community radio station would ever deliver a core service in direct competition with the BBC during this time of unprecedented co-operation.*¹⁰

Partridge further remarked:

*I do not want to jeopardise our relationship, but I must say that yesterday it looked like SIREN FM had parked its tanks on our lawn and was using one of our own commanders to complete the manoeuvre.*¹¹

It is perhaps surprising that the Manager of a BBC Local Radio Station, which, according to the BBC's latest figures (BBC, 2009) will, on average, cost the licence fee payer approximately UK£3.3 million per year to run, felt challenged by a station run by 1.5 paid personnel at a cost of around UK£60,000 per annum. The reaction was a somewhat surprising "heads-up" to Siren FM, indicating the BBC's perception, at least, of the potential for direct competition from a community radio station even in areas of output such as travel news, which, by its own admission, are no longer deemed to be of any particular import. Despite the somewhat terse tone of the correspondence from the BBC, good relations were subsequently restored, the incident earning the nickname "Travelgate" amongst the volunteers at Siren FM.

8. BBC Local Radio and Community Radio in Context

The UK is well served by the BBC both in terms of national and local radio services. Ten network stations cover the country using a combination of AM, FM and DAB (five of these services being available on DAB and other digital platforms only). Separate nation-based services (for Scotland, Northern Ireland and Wales) are also provided alongside forty local radio stations serving most of England between them. Since BBC Local Radio started in 1967, it has had to contend with the advent of local commercial stations and, since 2005, the growing 'third tier' of Community Radio services; these small-scale local stations must operate on a non-profit-distributing basis, but most are allowed to carry limited on air spot-advertising and sponsorship. Some choose to do so, whereas others do not. ***"Community radio stations are a new type of not-for-profit radio service, designed to operate on a small-scale and to deliver social gain to one or more communities."*** (Ofcom, 2009) In practice, the style of broadcasting employed by such stations can be either very 'commercial' or more akin to the traditional output of BBC Local Radio services.

¹⁰ Personal correspondence between Charlie Partridge and Andrew David, 04 December 2008.

¹¹ Personal correspondence between Charlie Partridge and Andrew David, 05 December 2008.

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Recognised as the founding father of BBC Local Radio, Frank Gillard had been a war reporter for the BBC during World War II, after the war returning to management roles within the Corporation. Gillard was inspired by local radio in the US. On a tour in 1954 he saw how; ***"small communities had developed local radio on a community basis."*** (Briggs, 1995: 620) Briggs tells us this had ***"a powerful influence on his attitudes to local radio."*** (*ibid.*) Gillard was particularly struck by WVPO, Stroudsburg Pennsylvania, a station broadcasting to a population of fifteen thousand people, operating during daylight hours only. According to Gillard, it ***"spoke to its listeners as a familiar friend and neighbour"*** (Gillard, 1954 - In Briggs, 1995: 621) and, he noted, was one of a growing range of local stations. As Briggs says: ***"he was to become both the main advocate of local radio inside the BBC, a very eloquent and determined advocate, and its main organizer."*** (Briggs, 1995:624) BBC Local Radio was eventually launched in 1967, alongside the re-organisation of the Corporation's national radio services and following the closure of most of the off-shore 'pirate' stations. It was the first provider of local radio in the UK; licensed commercial stations following six years later with launch of LBC (the London Broadcasting Company) and Capital Radio, in 1973. (Briggs, 1995: 887)

Localness, an important issue for all local broadcasters now, was already recognised by Gillard as crucial to public service broadcasters then. He felt it was their duty to introduce a local dimension and they could not claim to serve ***"the whole man"*** (Gillard, 1961 - In Briggs, 1995: 627) unless they did.

In the run up to its launch in 1967, there existed a growing interest in using BBC Local Radio as a tool for education. Furthermore, there was already an emerging recognition of the importance of social inclusion, this developing alongside the increasing cultural diversity within specific geographical communities as well as the United Kingdom as a whole. Four decades later, this recognition of diverse audiences, social inclusion and the potential to enhance education forms the basic rationale informing the operation of carefully targeted community radio services.

Within the current legislative framework for community radio, the characteristics of such stations differ little from those that underpinned early BBC Local Radio. Given the marked similarity to Frank Gillard's original vision for local BBC stations, and given the changes in BBC local radio over the intervening years, it could be argued that the new tier of community services may today be best placed to satisfy the local needs initially identified by Gillard back in the 1950s and 60s. In recent years, the traditionally distinctive local identities of individual BBC Local Radio stations have been at least partly subsumed by the Corporation's various moves to create a 'brand' for its local radio output. By targeting a common, aggregate, listenership, the result is a more homogenous BBC Local Radio network,

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which arguably is less responsive to the various specific needs and characteristics of the individual localities served.

There has been a paradigm shift in the BBC Local Radio network over the past five years, towards a re-evaluation of its core listenership, one which arguably encourages stations to move away from their traditional image as Gillard's "*familiar friend and neighbour*" (Gillard, 1954 - In Briggs, 1995: 621). The BBC's underlying concern that their local radio audiences are generally ageing, and therefore likely to diminish over time, led to the development of 'Project Bullseye'¹² and the introduction to bemused staff across the network to 'Dave and Sue', two characters identified as the personification of typical BBC Local Radio listeners. This was the same white, middle-aged couple for all BBC local radio stations no matter where in the country they were situated. 'Dave and Sue', were described in detail, emulating the audience identification practices employed by radio stations within the commercial sector. The broadcast staff at all BBC Local Radio stations were instructed to associate with the values, interests and concerns of this fictitious fifty five year old married couple. This approach met with some damaging criticism in the national press, which accused the BBC of 'ageism', quoting some of the BBC's own staff (unnamed) as saying:

"Local radio is the closest the BBC ever really gets to the people who pay the licence fee. But we are discouraged from putting the over-65s on air during phone-ins and to find topics that appeal to 'Dave and Sue', who exist in the imagination of BBC focus groups." (Quoted in Payne, 2007)

This essentially homogenous nature of 'Dave and Sue' appeared to contradict the initial aims of the founders of BBC Local Radio. David Self, a former radio correspondent for The Listener wrote: "*Dave and Sue are transforming BBC Local Radio from a public service into the audio equivalent of a pound shop...*" (Self, 2005). The imperative seemed to be to prioritise a more 'marketable' product over the traditional values which had previously held sway within BBC Local Radio and which reflected Gillard's recognition of the importance of local voices and local life alongside an insistence that a clear community focus should be paramount.

Today, the 'BBC Local Radio' network brand dominates both the sound of individual stations and the look of their publicity material, including the use of similarly branded station vehicles. Every station from BBC Radio Cornwall to BBC Radio Leeds, from BBC Radio Lincolnshire to BBC Radio Manchester, has the same look

¹² Explanation given by a BBC Senior Broadcast Journalist to one of the co-authors of this paper whilst working as a freelance journalist on a BBC Local Radio station, 2005.

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and similar programme structures and, as a result, the network has come to lack the local diversity, which was its greatest asset in previous years. It is worth noting that over this five-year period, BBC Local Radio listening figures have declined dramatically. The official RAJAR figures show that the 'Reach' figure for All BBC Local Radio in the quarterly period ending September 2005 was just over 7.5 million, whereas for the same period in 2009 the 'Reach' was just over 6.3 million. The official RAJAR website warns that there was a different method used to collate figures from June 2007, so it would be more reliable to look at the figures for then on only. Here, the weekly reach for the period ending September 2007 was just over 7.3 million, showing that BBC Local Radio has lost more than a million BBC listeners in the last two years. (RAJAR, 2009)

In the BBC's 2010 document (Kelly, 2008), the findings of internal research carried out by BBC English Regions now concentrate on 'Sue', with 'Dave' taking something of a back seat. The broad hypothesis behind this development is a presumption that women have more control over the radio dial than men do. In this document, the emphasis is on entertainment and its research claims that travel news, for example, should now have a much lower priority than has traditionally been the case across the BBC Local Radio network.

In November 2006, just a year after the first newly licensed community radio stations began broadcasting, the then Controller for BBC English Regions, Andy Griffie, developed the first Memorandum of Understanding (MoU) between the BBC and the Community Media Association (CMA). At the time, he acknowledged the welcome addition of community media but was keen to deny that there would be any threat from the new 'third tier' despite there being no previous assertions that it would pose any competition:

The BBC does not view the Community Media Association or individual on-air projects by CMA members as a threat or competition, and we have many common aims and objectives in our ambitions to serve local communities. Indeed, we have welcomed the arrival of community radio, in which communities make their own radio content, as an exciting and important addition to the broadcast landscape which can only enrich local lives. (Radio Today, 2006)

Jaqui Devereux, then Acting Director of the Community Media Association, had welcomed the agreement, saying she looked forward to:

... maximising the opportunities available in this mutually beneficial partnership which adds a new dimension to public service broadcasting

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through the collaborative efforts of the Community Media sector and the BBC." (ibid.)

However, the nature of this understanding was only vaguely defined and, to date, its impact on relationships between BBC Local Radio and their neighbouring community stations remains difficult to determine. A small number of individual relationships have been successfully formed but these are very much characterised by the local personalities involved. So far, there is little evidence to suggest the emergence of any consistent or widespread benefit to any significant number of community radio stations.

The BBC's '2008 England Review', contains just two examples of community radio services having benefitted from working relationships with BBC Local Radio stations. The review does however state that: ***"Stronger relationships continue to be nurtured in the community media sector."*** The specific examples provided are, firstly, a partnership between BBC London and Southall (London) based community station, Desi Radio; ***"... with staff moving between the two stations and BBC London helping to develop news and discussion programmes."*** Secondly, details are included of a BBC Radio Manchester community radio 'boot-camp', where the BBC hosted a number of training sessions. (BBC, 2008: 33) However, both these initiatives appear to have had short life spans. Recent research by the authors has revealed mixed experiences of BBC liaisons within the community radio sector:

At the positive end of the spectrum, BBC Norfolk are clearly supporting one of their local radio stations, West-Norwich based Future Radio. Tom Buckham, the Station Manager at the community station says that the BBC has offered work experience placements and broadband connections for outside broadcasts as well as access to online BBC training courses. In his view:

"...all in all the relationship between us and BBC Norfolk is pretty solid and hopefully other stations can develop something similar with their local BBC stations, although I'd imagine it will vary a lot from place to place."

Less encouraging is the situation in Gloucestershire, where Roger Thorne, a director at Forest of Dean Radio in Gloucestershire believes his local BBC station is not being particularly supportive at all:

"You may take it that I've not seen anything at our station. In fact one of our volunteers does some freelancing with the BBC "local" station and has got a commission to make a programme about community radio in

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their area. He's asking for some clips of our output to include in a Beeb programme, but no hint of payment or reciprocation that I can see. So personally I'm a bit annoyed with the Beeb."¹³

Perhaps one of the most developed relationships between a BBC Local Radio station and a small-scale community broadcaster is that which exists between BBC Lincolnshire and Siren FM. This relationship was facilitated by the existence of well-established partnership arrangements between the BBC and the School of Journalism at the University of Lincoln where Siren FM is based.¹⁴

Nevertheless, there is a perception in some quarters that the BBC gains more from the relationship than does Siren FM. For example, the Head of Regional and Local Programmes with direct line management responsibility for BBC Lincolnshire facilitated a one-year 'loan out' agreement involving one of the BBC station's Senior Broadcast Journalists, Maggie Curtis, working at Siren FM. This agreement involved Siren FM covering more than two-thirds of the costs; £25,000, which represented its entire year's grant from the local Co-operative Society. The cost to the BBC was just £10,000 to cover its expenses.

From a BBC perspective, the benefits of this secondment were clearly defined, but the potential benefits to Siren FM were less explicit. Siren's Managing Editor, Andrew David, has more than 30 years experience under his belt as a BBC senior producer, mainstream presenter and reporter. Academic staff at the University of Lincoln who volunteer for the station bring many more years of radio experience at BBC local and network level. As a result, professional broadcast expertise is in good supply. That aside, an extra pair of experienced and enthusiastic hand is always much appreciated and Siren benefited from the support of an additional staff member for two or three days a week. Meanwhile, the BBC were able to provide a unique opportunity for a member of its management team to enhance her professional development, spot young raw talent at the community radio station and access previously hard to reach audiences. Maggie Curtis says:

My view is that community radio stations like Siren offer a valuable training and recruitment ground for local BBC journalists / presenters / producers. It is a nursery slope in community radio - but somewhere like Siren, where the standards are high and the output aims to replicate, not the content, but ethos of a local radio station (i.e. a

¹³ At the time of writing, managers at Forest of Dean Radio say they may not be able to continue broadcasting into 2010.

¹⁴ Largely as a result of co-author of this paper, Deborah Wilson, having previously been on the staff at BBC Lincolnshire

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reasonable speech to music ratio) makes it a really valuable experience.¹⁵

Curtis also cites a range of achievements for the BBC, for example; sourcing potential new entrants to the workforce via an enhanced placement scheme, the access to hard to reach communities as well as the personal development she has enjoyed. For her part, she considers that she had:

... to learn quickly how to deal with different groups of people with different abilities, 99.9 per cent of whom are not paid and therefore can't be managed in the way [I am] used to dealing with other BBC colleagues. It has been enlightening in terms of situational leadership, lecturing, mentoring students and volunteers. (Curtis, 2009)

Siren's Andrew David was pleased to be able to offer this opportunity, which has since been cited a number of times by the BBC as an example of good practice in their co-working with community radio. However, the financial burden this arrangement placed on Siren; a community station with very limited resources is not made explicit. Elsewhere to date, there is little evidence of consistency in relationships between the BBC and community radio services across the country, a situation suggesting that the practical application of the initial MoU to date has been, at best, patchy. Moreover, because many community radio stations espouse the values of early BBC Local Radio, with a particular emphasis on local diversity, some BBC managers may be less willing to engage with them, perhaps perceiving such stations more as emerging threats than as useful partners for the future.

At the time of writing, the MoU, has been recently re-launched with somewhat less publicity than was the case for its predecessor.¹⁶

The new document differs only slightly from the 2007 draft. It does however suggest a reduction in expectations for the (revised) Strategic Framework. The re-launched version is far less specific than the original, which detailed strategic level meetings on a quarterly basis between representatives of the CMA and BBC English Regions to monitor and share best practice and act as central point of contact for internal BBC or CMA support. There was also a stated intention to publish the MoU on dedicated BBC and CMA web pages with quarterly updated contacts and minutes of meetings etc. This clearly did not happen, and this narrative has been replaced in the December 2009 agreement by a 'regular appraisal' and two opportunities each year for evaluation. Whilst this is offering less, the detail of the original was

¹⁵ Personal correspondence with co-author, Deborah Wilson, June 2009

¹⁶ 07th December 2009 at an event hosted by the BBC at The Mailbox, Birmingham

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not observed and if the scaled down expectations are implemented it will be more than has been delivered since the initial agreement was published in March 2007.

What is most noticeable in the revised MoU is the removal of any reference to the BBC not seeing the CMA and their members' projects as a threat or competition as was the case in the earlier statement by Andy Griffie. Instead, the new version contains a far more positive statement from the current Controller, BBC English Regions; David Holdsworth, about the development of co-working and which acknowledges the potential to enrich the BBC and also 'further develop' the community sector.

The statement by the Chair of the CMA, Phil Shepherd, has been updated - noting that although co-working has developed in some places, there remains much to do.

Jaqui Devereux, Director of the CMA, believes progress has been made in this redrafted MoU:

*There are important changes in the revised MoU, in particular the fact that it includes a wide variety of practical examples, drawn from what is actually happening around the country. In addition, the twice yearly meetings between the BBC, the CMA and member stations have been designed to highlight best practice concerning the MoU and to make sure that any issues of concern on either side can be dealt with quickly. Now we have this MoU with BBC English Regions, we can use it as the basis for further collaborations with other parts of the Corporation, for example in Northern Ireland, Scotland and Wales.*¹⁷

In a subsequent discussion regarding the redrafted MoU between one of the authors of this paper and David Holdsworth on a visit to the University of Lincoln, Holdsworth stressed his commitment to encouraging partnerships between the BBC and community media, referring to the progress being made as: "... *a series of small steps.*"¹⁸

Holdsworth emphasised that he would expect every BBC Local Radio Managing Editor to know who their community radio stations were in their particular editorial patch and would suggest that they met with them twice a year. He also spoke of his intention to suggest that his Managing Editors look at using quality content produced by those community stations, with credit, and that there was a

¹⁷ Personal correspondence with co author, Lawrie Hallett, 11th December 2009.

¹⁸ Personal communication with co-author, Deborah Wilson, 10th December 2009

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possibility of donating redundant BBC equipment to those community radio stations who could benefit from it.

For the present, while the updated MoU shows some promise, it has yet to be genuinely proven in practice. The fact that the BBC has re-examined and revised the agreement would indicate a genuine commitment to exploring meaningful and mutually beneficial working relationships with community media. Indeed, a pragmatic assessment might suggest that BBC Local Radio, in the current financial climate, has the greater need for support. This is particularly the case in respect of what community media can offer in terms of content production, widening the diversity of the workforce and reaching less accessible audiences ... On this basis, it is possible to suggest that it is BBC Local Radio that might ultimately be the greater beneficiary of the relationship with community media.

9. Conclusions

Given its role in launching Community Radio in the United Kingdom, it is not surprising that the relationship between Ofcom and the community radio sector is more mature than the relationship that the sector is gradually developing with the BBC. To date, the relationship between community radio broadcasters and the regulator have been largely productive and relatively harmonious. Whilst the relationship between the BBC and the CMA is clearly developing well, relationships between individual community radio stations and the corporation are perhaps a little less predictable, comprising some highly productive interactions as well as some practical difficulties and disagreements.

The question arising is how might these two relationships (both of which the authors would argue are important for the future stability and development of the community radio sector) evolve in future? With a potential change of Government in 2010 and unpredictable economic times ahead, might there be a risk that the aims and objectives of the various players, which have hitherto been largely convergent, become divergent instead?

Considering the above, there are several key areas within which difficulties could arise. Firstly, there is the issue of funding. Whilst the BBC is funded by the licence fee and the commercial sector by advertising revenue, there is very little in the way of relatively guaranteed financial support for community radio services. Because their programming is not necessarily designed to maximise listenership, community stations not structured to make a profit, tend not to be terribly attractive to commercial advertisers. However, it could be argued that there are other reasons why a commercial organisation might wish to be associated with such a service. Supporting a Community Radio station through advertising or sponsorship might for example benefit a company in terms of tax benefit or image enhancement.

With an economic downturn reducing the availability of such sources of funding, community radio operators may look towards both Ofcom and the BBC to support their demands for greater centralised funding. It is entirely possible to foresee

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demands that Ofcom should argue the case for an enhanced Community Radio Fund more strongly with Government. There might also be suggestions that any 'top-sliced' revenues taken out of the Television Licence Fee would be more appropriately passed over to small-scale not-for-profit broadcasters (which arguably are small-scale PSRB operators) instead of being used to subsidise private for-profit commercial interests. Vociferous attempts to increase the size of the Community Radio Fund could conceivably weaken the relationship with Ofcom, and requests for 'top-sliced' income from the licence fee would almost certainly offend the BBC.

A second area of potential conflict arises because of Ofcom's wider responsibilities in the area of non-BBC radio broadcasting. The regulator is obliged by legislation to protect the interests of commercial radio operators. In its 'Regulation of Community Radio Services' document (Ofcom, 2008b), Ofcom cites the CRO 2004, which states that it: "... **must take account of the effect that community radio licensing might have on commercial radio services.**" (Ofcom, 2004c) In practice, this means that Ofcom will request information from commercial operators if it has any concerns that a proposed community station might have a serious adverse impact on their businesses. More widely however, as availability of FM broadcasting frequencies dwindles, the future expansion of community radio will become entirely dependent upon the successful 'migration' of larger commercial radio broadcasters to digital platforms (in particular DAB). If DAB as a platform fails and commercial stations abandon this move en-mass, then the future development of further community services will inevitably have to come to a halt, with considerable levels of demand remaining unsatisfied.

Moving to the relationship between Community Radio and the BBC, despite Ofcom's influence over the BBC in other areas, the regulator has said little or nothing regarding any potential conflict between BBC Local Radio and the community radio sector. The regulatory requirement for Ofcom to protect the interests of other local services is specifically intended to protect commercial radio licence holders, even though "**[a]t a local level, commercial radio still has three times the audience of BBC local radio**". (Ofcom, 2007a: 8) In addition, arguably much of community radio's content might be said to compete more directly with BBC local radio output rather than mainstream music-based commercial radio programming.

At present, the BBC appears keen to work with community radio operators and it is easy to see how such a relationship could be mutually beneficial. For example, whereas previously BBC Radio Lincolnshire had, for a couple of years, broadcast a weekly bulletin of news in Portuguese and operated an action desk with Community Service Volunteers, more recently these worthwhile initiatives have been cut as cost saving measures. Today, BBC local radio stations are looking towards community radio to provide them with new raw talent and more diverse content, as well as potentially providing opportunities for staff development opportunities and even alternative or additional facilities in an emergency. However, does this mean BBC Local Radio has begun to recognise that it is failing to serve its communities as it once did? By at least appearing to forge links with

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its small-scale community neighbours, might it be enjoying more benefits that it is prepared to give? How long might it be before some community radio operators' tire of being perceived as very junior partners in these relationships even when they are producing content which BBC Local Radio is no longer willing to deliver?

Community radio stations, if they are operated true to the spirit of the sector and not as commercial stations by the back door, may well be able to deliver successfully what the BBC would itself prefer to offer in a local context. With its limited coverage and lack of universality to date, community radio cannot pretend to be a direct replacement or even competitor for BBC Local Radio and in any event, many within the sector are certain that listening figures are not the appropriate gauge of success for their services. The fact that the sector prefers to measure its success in terms of the positive impacts which its stations have on the communities they serve suggests that direct competition with BBC Local Radio should remain the exceptional case, particularly as the target demographics of these two types of station are, more often than not, very different from each other.

With such a fledgling new radio sector, it remains far too early to make any clear predictions about future developments. However, aside from maintaining good relationships with the regulator, the forging of more mutually beneficial relationships with the BBC is not only possible, it may be indeed be necessary to help the sector grow and mature. Community Radio and BBC Local Radio would seem to be natural partners; both having potentially much to gain from such a relationship. However, for such developments to prosper, the recently signed revised Memorandum of Understanding between the Community Media Association and the BBC needs to be used to broaden and multiply the operational links between the two tiers of local radio. It is feasible that if the BBC fails to engage in wider dialogue with their near broadcasting neighbours, the long overdue development of the 'third tier' of community radio services could eventually threaten BBC Local Radio, assuming it survives the inevitable next internal review and does not homogenise itself into irrelevance and obsolescence in the meantime. The BBC needs to make cost savings and if listeners in their localities are being well served by community radio, then awkward questions may be asked as to the validity and viability of BBC Local Radio in future.

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