

Your response

Question	Your response
Do you have any comments on our proposals?	<p>The Community Media Association (CMA) welcomes the invitation to comment on Ofcom's Annual Plan of Work 2020/21.</p> <p>Additionally, we commend the effort of the Broadcast Licensing Team has put into completing the requests for 130 coverage improvements and extensions. This has led to a number of significant enhancements in service delivery for many community radio stations.</p> <p>We do note, however, that the Broadcast Licensing Team is still, at the time of writing, currently in the process of completing the final round of analogue licensing which consists of 35 applications. The closing date for receiving applications was in March 2019 and the CMA has received a significant number of questions from some of its members as to why this process is apparently taking so long.</p> <p>Furthermore, despite Ofcom's clear statement issued on 26 September 2019 that "this will be the last round of community radio licensing on analogue (FM or AM) for the foreseeable future as we turn our attention towards the implementation of the licensing framework for small-scale DAB" and despite some research in this area by the CMA and a number of representations to Ofcom on this matter, there still remains a significant and vocal demand for an additional round of analogue licensing for community radio - on both AM and FM.</p> <p>Whilst the prospect of broadcasting on small-scale DAB (SSDAB) might possibly present a number of future opportunities for community broadcasters, there is a number of aspirant community radio broadcasters that have expressed little interest in SSDAB and who are</p>

questioning - given the time it typically takes to complete a licensing round – how long they will now have to wait for the opportunity to be able to apply for a licence if Ofcom will not consider any further rounds of analogue community radio licensing for the foreseeable future. We would welcome Ofcom's response to this particular point.

Moreover, some community radio stations consider SSDAB an inadequate alternative to analogue broadcasting as listeners from low-income backgrounds are particularly unlikely to be able to afford a specialist receiver to pick up a digital broadcast - especially as SSDAB multiplex operators are expected to broadcast using the more up-to-date DAB+ codec. It has been well-documented that the UK's leading retailer is still selling own-brand DAB receivers that are not compatible with DAB+ and therefore there is likely to be a substantial tranche of receivers bought relatively recently that are already effectively obsolete. An argument made by some community broadcasters is that this 'drive to digital' radio policy will effectively be discriminatory to marginalised low-income groups. We would welcome Ofcom's response to this point.

The CMA formally requests that Ofcom considers undertaking a future round of analogue community radio licensing as soon as possible and, should capacity permit it, to consider undertaking a round of analogue licensing in parallel with licensing small-scale DAB.

However, with the above caveats in mind, the CMA looks forward to the completion of the fourth round of licensing of analogue community radio in 2020 and we look forward to a new tranche of stations joining the sector.

The CMA notes that Ofcom's consultation "Licensing small-scale DAB - How Ofcom would exercise its new powers and duties being proposed by Government" closed on 4th October 2019 and Ofcom's statement has not yet been published almost five months later.

Ofcom will of course be aware that the licences for the ten trial SSDAB multiplex areas will expire at the end of March and these licensees require swift confirmation of their licence status. The CMA looks forward to Ofcom publishing its consultation statement which will lead to the first round of licensing SSDAB multiplexes and services expected from mid-2020 onwards.

The CMA requests that, in addition to the comprehensive proposed Annual Plan for 2020/21, Ofcom commits to undertake to commission research into the Community Radio Fund - in particular, research to demonstrate its impact and how community radio stations use grants from the Community Radio Fund to leverage access to other funding.

Increased support for the Community Radio Fund would assist to redress the iniquitous situation with regard to the current Community Radio Fund which has reduced in size since its launch with £500k per annum in 2005, while the number of channels has increased from the first 15 pilots to nearly 300 stations today.

A Community Radio Fund that is able to support community radio station core costs, as recommended by independent research commissioned by the Radio Authority (the forerunner to Ofcom) in 'New Voices' (Everitt, 2003), would have a transformational impact on a community media sector which is already delivering substantial public value but whose

	<p>full potential is not being realised.</p> <p>Experience with the Community Radio Fund so far indicates that such investment would leverage at least two or three times the level of support from other sources including other grants and sponsorship.</p> <p>The CMA therefore calls upon Ofcom to work with the CMA and DCMS to make the case to the Treasury for a much-enhanced Community Radio Fund that is able to offer greater support for community radio stations and will also be capable of meeting the extra demands placed on it by the expected expansion of community radio onto the new platform of small-scale DAB.</p>
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