

# Consultation response form

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<b>Consultation title</b>	Ofcom's proposed Plan of Work
<b>Full name</b>	[X]
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	UK Community Radio Network
<b>Email address</b>	[X]

## Your response

Question	Your response
<b>Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2024/25?</b>	Confidential? – N



## Ofcom 2024/25 Plan of work

### UK Community Radio Network Response

#### Public - Non-Confidential

The UK Community Radio Network is the national organisation that represents, supports and develops Ofcom licenced Community Radio stations across the UK.

We continue to have a rewarding and engaging relationship with Ofcom, helping us to deliver on the issues of the sector and making it easier for us to advocate on behalf of stations and wider concerns. We thank Ofcom for their continued support and working with us.

In the annual plan 2024/25, we would like to push for more activity around the support and development of Community Radio, especially in the following area:

**Coverage Expansions and Improvements/Transmitter relocation requests:** It would be useful for Ofcom to continue to provide the resources to manage applications for coverage expansions and improvements, so that Community Radio can continue to best serve their communities, especially as they continue to grow. In some cases, expansion to serve more areas which are underserved - particularly given the reduced coverage by traditional broadcaster - will be vital. We would like Ofcom to also continue to support stations who wish to or need to move their transmitter.

**Future of FM spectrum:** As an organisation and as a sector we firmly believe that FM will continue to be a viable transmission platform for some time to come. We know, from our own internal feedback, there is still good demand not only for its continuance but also its expansion with new licences to enable new stations to launch on FM. We know that most recently Ofcom has cited a lack of resources and a focus on SSDAB as the reason for not being able to offer new licences, however we feel that as the interest in new SSDAB licences is starting to slow, this could be addressed in this period. There has not been any new general rounds for CR FM licence applications for nearly 10 years.

As such we would like Ofcom to consider carrying out a body of work to both understand the level of interest and demand for new FM Community Radio stations (e.g. via an EOI/consultation), and also work to consult with the sector and industry on how to process future applications and develop a timetable for future rounds.

We would like to see Ofcom starting to licence new FM Community Radio stations from 2025, and also believe that the changes in legislation brought about by the Media Bill, and possible changes in the CRO will enable easier and more streamlined advertisement and application processes.

**SSDAB:** As an organisation, we support the continued rollout of SSDAB, but do have concerns about its current operation, and future interest in new licences (Ofcom's most recent EOI shows the demand is starting to slow), we have also recently carried out a survey of the sector which has flagged some concerns and areas for consideration.

As such we are calling on Ofcom to consider reviewing the power granted for existing and new SSDAB multiplexes, and also considers and reviews the coverage thresholds to make

sure that SSDAB is actually able to provide the robust coverage needed to make it sustainable and the services that broadcast on it successful and sustainable.

We are also asking Ofcom to review its use of the '40%' rule, to ensure that in certain areas the multiplex is provided the best coverage to serve their community, and also provide it with the best opportunity to be sustainable. We welcome and support the recommendation by Maxxwave of possible criteria; 1. The overlapping local multiplex has operated at or near capacity for some time, 2. There are not adjacent multiplexes which stations could use to give continuous coverage, 3. It is not possible to cover a wider area by installing a second multiplex due to lack of spectrum, 4. Consideration should be made of the build-out of the overlapping regional mux, 5. Consideration should be made of the geographical area overlap between the regional and SSDAB muxes, 6. Consideration should be made of the SSDAB mux coverage and how that relates to an urban area or similar.

**Station Communications & Sector Engagement:** We do thank Ofcom for the continued dialogue over the concerns and issues of how they communicate with Community Radio stations. We continue to get feedback from stations about how long it can sometimes take Ofcom to respond to emails, or deal with formal processes (Key Commitment Change Requests, Licence Renewals etc).

We would like Ofcom to formally create expected turn around objectives for their communications with stations, and publish these details, but also when dealing with stations be realistic with timeframes and keep stations informed in any delays and updates. These delays can cause significant impact for stations, especially for licence renewals which can sometimes be confirmed quite close to licence expiry regardless of when the application was submitted. This delay can have impact on staffing contracts, service level agreements and grants, and also on leases and studio space planning.

We would also like to formally invite Ofcom to attend our annual Community Radio conference that we are planning to hold in October this year alongside the Community Radio Awards, we feel that engagement directly with stakeholders and stations at events can be a great way to improve relations between the regulator and those they regulate, especially to encourage stations to have a positive and relationship with Ofcom.

**Community Radio Fund:** We continue to lobby for the development and increase of the Community Radio Fund. Although we know that the financial limit of the fund is outside of Ofcom's control, we do want to request that Ofcom formally considers multiyear or two year applications to the Community Radio Fund. We see many examples of roles that are funded just starting to get going and starting to provide results and the funding ends; in some cases, a multi-year role could further enable the role to be self-financing and continue after the length of the funding.

Our thanks for the continued support and relationship with Ofcom

UK Community Radio Network