

Key Commitments change request form

Community radio station name:	Lincoln City Radio (on air as LCR FM)
Licence number:	CR000166BA/4
Licensee (company name):	Lindum Radio Broadcasting CIC
Contact name:	Ed Wellman
Date of request:	04/06/2024

Details of requested change(s) to Key Commitments

A community radio operator may apply to Ofcom to have the station's Key Commitments amended.

Please complete the table overleaf by including your current Commitment in the left hand column and your proposed revised Commitment in the centre column. In the right hand column please give a brief explanation as to why you wish to make each change.

We also require you to complete a second table which asks you to explain your proposed changes with reference to the statutory framework.

If you do not provide an explanation for your proposed changes and a completed comparison table, Ofcom cannot consider a Key Commitments change.

Please complete this form and return it to: broadcast.licensing@ofcom.org.uk

Existing Commitment (as in your published Key Commitments) Please only include one commitment change per row, and add more rows as necessary into the table.	Proposed revised/new Key Commitment	Reason for proposed change
Description of character of service: Lincoln City Radio educates, informs and entertains adults in Lincoln with a particular focus on the over-50s. It gives listeners opportunities to offer their opinions and discuss issues of interest.	Description of character of service: LCR FM educates, informs and entertains people in Lincoln with a particular focus on the over-45s. It gives listeners opportunities to offer their opinions and discuss issues of interest.	This reflects our ambition to reach a slightly younger audience who can engage with the station to produce content for us and build a new generation of listeners and volunteers to sustain the station.
Music. The main types of music broadcast over the course of each week are MOR music and easy listening. Specialist music genres will also feature.	Music. The main types of music broadcast over the course of each week are AC (adult contemporary) music. Specialist music genres will also feature.	This is in line with above proposed change to include a wider audience with music from the 1950s to the present day in daytime output.
The service provides original output for a minimum of 10 hours per day.	The service provides original output for a minimum of 70 hours per week.	Recruitment and retention of local volunteer staff is challenging, and we are requesting this change to prevent any occurrences where LCR may not meet a daily target due to illness or availability.
The service provides locally-produced output for a minimum of 13 hours per day.	The service provides locally-produced for a minimum of 70 hours per week.	Recruitment and retention of local volunteer staff is challenging, and we are requesting this change to prevent any occurrences where LCR may not meet a daily target due to illness or availability.

Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified¹) Ofcom must be satisfied that your proposed changes **meet at least one of the criteria referred to below**.

Please indicate which of these criteria you believe your proposed changes satisfy by deleting YES or NO as applicable and provide an explanation for why you consider a particular criterion is met in the relevant box. You should note that even if Ofcom is of the opinion that your explanation of your proposed changes meets one or more of these criteria, there may still be reasons why Ofcom is unable to consent to the change. When explaining your proposed changes, it is not enough to state that you believe one of the criteria is met. You must also demonstrate *why* you consider that at least one of these criteria is met.

In particular, if Ofcom is not satisfied that the changes would not substantially alter the character of the service (criterion (a) below), Ofcom cannot consent to the change without consulting on your proposals.² If this is the case, we will contact you to confirm that you are happy for us to consult on your proposed changes, and whether you wish to make any changes to your request in light of the need to make it public.

As part of our consideration of your request to make changes to your Key Commitments, we require applicants to provide an explanation for **at least one** of the criteria below.

(a) In your judgement would the proposed changes substantially alter the character of the service?	YES/NO (Please explain why below)
No. The change to description of service, music policy, and a move to a requirement for hours would not substantially alter the character of LCR's service.	
(b) Do you consider that the proposed changes would narrow the range of programmes available by way of relevant independent radio services to persons comprising the relevant community?	YES/NO (Please explain why below)
No. There is no change to the diversity of community programming.	
(c) Do you believe that there is evidence that, amongst persons comprising that community, there is a significant demand for, or significant support for, the changes that you have proposed?	YES/NO (Please explain why below)
We believe that changes in the local radio landscape in Lincolnshire suggest that listeners who have less choice due to networking on other stations, can be served well by LCR.	
(d) Do you consider that your proposed changes would be	YES/NO

¹ As amended by sections 312 and 313 of the Communications Act 2003 and modified by the Community Radio Order 2004.

² Ofcom may approve a change under any of criteria (b), (c), (d) and (e) without consultation, or after a consultation of less than 28 days, if Ofcom considers that to hold a consultation at all, or for 28 days or more, would result in a delay that would be likely to prejudice the interests of the licensee. Ofcom may also remove for the purposes of consultation any confidential information submitted by the licensee.

prejudicial to the access by members of that community to the facilities used for the provision of the service and for training in the use of those facilities?	(Please explain why below)
No. There is no change to opportunities for community outreach provided by LCR for presenters and other station volunteers.	
(e) Do you consider that the proposed changes would be prejudicial to the delivery of social gain resulting from the provision of the service provided under your licence?	YES/NO (Please explain why below)
No. Programmes will continue to be content-led, and connections for social gain maintained and strengthened.	

<p>Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.</p> <p>In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom's published guidance on changes to Key Commitments (https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf).</p>
<p>There is no additional information/evidence to add.</p>

Data Protection

We require the information requested in this form in order to carry out our licensing duties under the Broadcasting Act 1990, Broadcasting Act 1996 and Communications Act 2003. Please see Ofcom's [General Privacy Statement](https://www.ofcom.org.uk/about-ofcom/foi-dp/general-privacy-statement) (<https://www.ofcom.org.uk/about-ofcom/foi-dp/general-privacy-statement>) for further information about how Ofcom handles your personal information and your corresponding rights.

Amended May 2018

Ofcom notes on the request

The request was AGREED, because Ofcom was satisfied in relation to Section 106 (1A)(a) of the Broadcasting Act 1990 (as modified by the Community Radio Order 2004, and further modified by the Community Radio (Amendment) Orders 2010 and 2015) i.e. that the change would not substantially alter the character of the service, and for the policy reasons given below.

The Licensee is requesting to convert its Key Commitments for locally produced and original output from daily to weekly requirements, with locally produced output also being reduced from 13 hours per day (91 hours per week equivalent) to 70 hours per week. The Licensee is requesting this change in order to give it more flexibility to deal with fluctuations in volunteer availability and to deliver its requirements for original output and locally-produced output across the week.

We are generally happy to approve requests to convert a daily original output requirement to a weekly requirement, understanding that this provides greater flexibility to stations in managing their resources over the course of a week without affecting the service provided to listeners. We are also satisfied that the reduction in the locally-produced output requirement over the course of each week will not substantially alter the character of the service, and we recognise that changing economic circumstances affect the amount of time volunteers can dedicate to a station.

The Licensee is also requesting a minor change to its character of service, to include “a particular focus on over-45s”. In requesting this change, the Licensee has stated that it is seeking to reach a slightly younger audience from its target community in order to sustain the service. Ofcom is satisfied that this change does not constitute a substantial change to the Licensee’s character of service, and that the change may encourage a broader part of the community to interact with the service.

The Licensee is also seeking to amend its music requirement to replace reference to “MOR music and easy listening” with “AC (adult contemporary) music”. In requesting this change, the Licensee has stated that it anticipates reaching a wider audience with “music from the 1950s to the present day in daytime output”. Whilst we note that the requested change constitutes a change to the type of music that will be played across the week, we do not believe that this constitutes a substantial change to the Licensee’s character of service to inform and entertain adults in Lincoln.

In terms of our policy criteria, Ofcom is satisfied that the changes will not affect the station’s ability to meet the community radio ‘characteristics of service’ set out in the legislation, and there are no other policy criteria which would prevent us from implementing this change. We therefore decided to exercise our discretion to approve this change.

July 2024