

## Key Commitments change request form

<b>Community radio station name:</b>	WRFM
<b>Licence number:</b>	CR101261
<b>Licensee (company name):</b>	Wittas Wireless Telegraphy
<b>Contact name:</b>	Laura Dean
<b>Date of request:</b>	07/02/2024

### 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](mailto:broadcast.licensing@ofcom.org.uk)

<b>Existing Commitment (as in your published Key Commitments)</b> Please only include one commitment change per row, and add more rows as necessary into the table.	<b>Proposed revised/new Key Commitment</b>	<b>Reason for proposed change</b>
The service provides locally-produced output for 24 hours per day.	The service provides locally-produced output for 129 hours per week.	Volunteer availability fluctuations and public transport limitations, sometimes hinder our ability to fulfil key commitments with required hours. To counter this, we're piloting a solution: allowing some presenters to produce shows from home. We ensure their content remains regionally relevant and this approach helps us maintain local content while addressing volunteer challenges and cost concerns.

## Statutory requirements

Under section 106(1A)(a)-(f) of the Broadcasting Act 1990 (as amended and modified<sup>1</sup>) 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.<sup>2</sup> 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 core content and presentation style will stay consistent, but presenters will have more freedom to choose their broadcasting locations.	
(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. Our commitment to exceptional programming remains unchanged, bringing the quality and consistency expected.	
(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)
Yes, actively seeks innovative solutions to strengthen its operation and empower volunteers with greater flexibility during these challenging times.	
(d) Do you consider that your proposed changes would be prejudicial	YES/NO

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

<sup>2</sup> 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.

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, While adapting local hours, WRFM prioritises local opportunities with training for new and existing 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, Empowering the community, WRFM offers training, promotion for communities, and volunteer placements.	

<p><b>Please set out below any additional information and/or evidence you wish to provide in support of your proposed changes.</b></p> <p>In particular, you may wish to outline how you think your proposed change(s) fit(s) within Ofcom's <a href="https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf">published guidance on changes to Key Commitments</a> (<a href="https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf">https://www.ofcom.org.uk/data/assets/pdf_file/0017/31913/kc-changes-guidance.pdf</a>).</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 Commitment for locally produced output from a daily to weekly requirement, but also to reduce it from 24 hours per day (168 hours per week equivalent) to 129 hours per week. The Licensee is requesting this change in order to give it more flexibility to deal with fluctuations in volunteer availability and public transport limitations, stating that making this change will allow volunteers to broadcast content produced from their homes outside the licence area.

While this is a relatively large reduction in the amount of locally produced content required each week of approximately 30%, we believe that 129 hours per week remains a relatively high commitment, and one that will ensure the Licensee continues to deliver an appropriate amount of locally produced output. We agree with the Licensee's assertion that content produced from volunteers at home could still be relevant to its target community as part of a varied schedule, noting that a sizeable amount of content must still be produced from within the licensed coverage area.

We have considered this request under our policy criteria and consider that there are no policy reasons to refuse this request. We are satisfied that the change will not prevent the Licensee from providing a service for the people of Witney and outlying areas in West Oxfordshire, and that the change will not reduce the social gain delivered to that community. We have therefore decided to exercise our discretion to approve the change.

**June 2024**