Submission to the Future of Media Commission

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A new community media model from the ground up

In this submission, we argue that Irish media is stifled by a lack of innovation and that existing barriers to change threaten its future. Based on our practical experience of alternative, community, commercial, local and national media over the past 35 years, we are convinced that resilience in the sector is achieved through complexity and growth and that growth is brought about by innovation. We propose a new expanded grassroots model of community and alternative media based on more fluid access to spectrum by groups smaller and bigger and more diverse than those represented by existing community media. This is based on the principle of fostering meaningful diversity and participation across underserved groups and draws on a non-commercial philosophy of public media but does not focus on RTÉ as the main public broadcaster. This is not because we do not believe that RTÉ needs reform, but because we wish to prioritise a new community media model from the ground up.

The Broadcasting Authority of Ireland and its predecessor organisations have been formally committed to fostering diversity in Irish media for 30 years. For instance, the *Broadcasting Services Strategy* of 2018 makes several references to the topic, stating that one of its objectives is to 'foster and promote quality programming in the Irish language and to encourage the development of Irish language initiatives across the broadcasting sector'. The BAI adds that it 'is open to exploring other service types, including niche and Irish language radio services' and that its licensing plans will promote diversity and pluralism including in the Irish language (BAI, 2018). However, as currently constituted, the regulatory framework is incapable of fostering meaningful diversity due to excessive bureaucratic obstacles that stifle rather than foster access to media. The scarcity survival strategy of commercial radio – meaning that radio was the dominant source of music and information – is over. The scarcity model, dominant from 1989-2010, will no longer assist domestic commercial media in the way it did. It is time to retreat from it and open up media to truly diverse uses, offering access to all platforms to all stakeholders.

The post-1989 era was characterised by over-regulation of the sector and a lack of innovation, applying a 'one size fits all' approach to radio across Ireland. Commercial radio was prioritised for the first six years, undermining earlier successes by community broadcasters during the pirate era. The community sector was a late addition and has suffered from slow development, failing to grow beyond approximately 20 stations despite the elapse of 25 years. Ownership of commercial radio has become concentrated in conglomerates and there has been a lack of innovation in content, technology and philosophy.

Audience moving away from broadcast media

Ireland has witnessed a dramatic shift in media consumption habits in the past decade. Evidenced by the JNLR book of 2019 and deepening a trend witnessed in recent years, youth are moving away from broadcast radio. In Dublin, with the greatest availability of fibre broadband, 4G & 5G, 15-24 year olds are abandoning broadcast radio at a rate of 10-12 percent each year or 3 percent per quarter (and accelerating up until COVID-19 lockdown 1). At the current rate of attrition, there will be no market for this age group in 4 years' time (JNLR October 2019 compared to JNLR July 2018). But having a vibrant broadcast media is important to society where the information and entertainment received through it is linear, live and tailored to the entire audience (for example Covid-19 news, breaking news and referendum debates).

Reaching all the people with broadcast media still matters. The digital media to which audiences are turning are in silos where the curation is self-directed, and it is difficult to reach those audiences with public service media. This underscores the importance of broadcast media and its ecosystem, which nurtures future broadcasting personnel. If broadcast delivery is important, so is the supply of talented and interested people who have developed their skills in smaller broadcasting stations. Before 1989, the current cohort of broadcasters gained these skills on 1000+ pirate radio stations in every town in Ireland (Walsh & Greene, 2020).

Scenarios for change

Urgent reform of the licencing policy of broadcast community media is required to make it appealing to young people and other groups marginalised or ignored by the current mass media model. All of the evidence calls for an expanded and more fluid model that prioritises niche and micro audiovisual services reaching underserved groups especially youth. Such groups could be larger or smaller than those already adequately represented in community

media. Such a scenario would require a partial deregulation making it easier for people to set up micro outlets on all available spectrum including AM, FM, DAB, DTT and online, based around the concept of community media hubs linked to existing broadcasters or initiatives. All broadcasters should be incentivised to utilise unused spectrum and the development of LPAM, LPFM and small-scale DAB for use by hyperlocal radio services. The broadcasting levy for community/institutional radio stations should be scrapped and the temporary licence process significantly simplified and extended from 100 to 365 days. The charge under Section 71 of the Broadcasting Act for a content provision licence in order to broadcast on DAB is another significant obstacle to access that needs to be removed. Sustainable core funding for community media is essential in order to secure its future and this and other funding models need urgently to be explored. Core funding could be achieved partially through the proposed levy on on-demand audiovisual services stipulated in the revised EU Audiovisual Media Services Directive, in order to fund the production of audiovisual content in Ireland. Training people in media skills and boosting media literacy would be a key part of any such new model.

If Irish media continues to rely on the post-1989 model, the sector will be starved of talent and ideas. The small number of community and institutional stations does not bode well for participation of young people in radio, depriving them of opportunities to become the broadcasters of the future. Opening up true access to all allows media to experiment and be innovative, train new voices to become the storytellers of the future and create a future digital planet of oral tradition. Innovative radio services in recent years include arts project X-PO Radio in Co. Clare, community network Together FM in west Dublin, specialist service Dublin Digital Radio, alternative music station 8Radio.com, islands station Oileáin FM in west Cork and pop-up mental health station Walk In My Shoes Radio. Successful community and niche initiatives are happening all over the country and are arguably stronger now than ever before in the post-Covid age. However, getting any of these stations or projects on air involves unnecessarily complex and cumbersome bureaucratic, technical and financial obstacles that act as major impediments to innovation and revitalisation of the radio sector.

Forced to close by Covid-19, churches have reverted in large numbers to broadcasting Mass on FM in the absence of accessible LPAM or LPFM options that could serve listeners over a small area. There is a small but strong scene of rap and grime music in Ireland but no media

outlets to serve this niche. It should be possible to broadcast on DTT or DAB to reach this demographic. Ground-breaking podcasts are being made all over the country but converting them into innovative, niche radio services available to wider audiences is complex and slow. Irish speakers are very poorly served on stations other than Raidió na Life and RTÉ Raidió na Gaeltachta but a new model could boost micro-local media production in Irish and allow new services to flourish (Walsh et al, 2018).

Community radio in the UK has witnessed impressive growth in recent years owing to the liberal licencing policies of OFCOM. Further growth is expected shortly with the roll-out of small-scale DAB. Radio is being kept alive in the UK by regulatory change because innovative beats stagnation but no such change is in sight in Ireland. Radio is often seen as a secondary medium, but remains 'absolutely entwined in everyday living', 'has the ability to engage with people's emotions' and is 'a deceptively powerful medium' (Tacchi, 2000). However, Irish radio is being failed by the current model, which is characterised by commercial stations using outdated formats to chase shrinking audiences and a fragile community sector vulnerable to collapse. It is time to renew radio by opening up true access to all through a roll-out of niche, micro services across a range of platforms.

Conclusion

We see the following action points as essential to a new grassroots public media model:

1. Foster and grow micro and niche services for underserved groups.
2. Deregulate spectrum to grow diversity of use.
3. Incentivise use of unused spectrum for hyper-local media.
4. Establish and fund a national network of community media hubs.
5. Develop core-funding model for such community media and hubs.
6. Abolish broadcasting levy for community and institutional stations.
7. Streamline licencing process to facilitate alternative media uses.
8. Scrap Section 71 fees for content licences.
9. Roll out media literacy training to deliver ready to use practical media skills.

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Biographies

Brian Greene

Brian Greene works as Technical and Production Coordinator with community radio station Phoenix FM in Dublin. He has 35 years of radio experience starting on pirate community radio in Dublin in 1985. He is an award-winning podcaster with a BA in Journalism from the University of Wolverhampton, UK and an MA in Social Media Communications from Dublin City University in Ireland. Brian has worked with radio archives, recording oral history and indexing historic recordings at the Irish pirate radio audio archive Pirate.ie.

Dr John Walsh is a Senior Lecturer in Irish at the School of Languages, Literatures and Cultures where he teaches sociolinguistics and media studies. Dr Walsh's PhD on the Irish language and socio-economic development was awarded by Dublin City University (DCU). Before that, he completed an MA in International Relations also at DCU and he holds a BA in Irish and Welsh from University College Dublin. Dr Walsh previously worked as a lecturer in Irish at DCU, with the European Bureau for Lesser Used Languages in Brussels and as a journalist with local and national commercial radio and national public broadcasters RTÉ and TG4. He first gained broadcast experience in pirate radio in Dublin from the 1980s and is now a volunteer with community station Flirt FM in Galway. Along with Brian Greene, he is a co-founder of Pirate.ie.

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