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2009,

The BBC is there to fulfil the Royal Charter, commercial radio is there to make a profit, so to have a defining characteristic that says, "community radio is about…" and to be able to say, "it is about social gain" - now that makes something very potent and interesting within

The approach is particularly relevant to community radio, not only because of the political environment at the time of its formation, but also because even amongst its advocates, community radio has many different meanings (Jankowski, 2002). An understanding of how a workable solution was reached in terms of re-framing could lead to a wider understanding of how the media came to acquire a particular identity in the UK.

The three starting points for this study are: (1) how community radio policy developed amidst the context of the neo-liberalisation of media policy; (2) how potentially competing views positioned the issue and how these positions were sufficiently reconciled so that policy

2.

This chapter proceeds in four sections. The first briefly considers two different approaches

debate, to get them to agree to a certain construction of reality, and in order to legitimate certain interests and de-legitimise others.

Analysis of policymaking: social constructionist orientations

Majone's (1989) work on argumentation has been employed by others who theorise not only the role of values and mental frameworks used in arguments but also the role of social interactions themselves in policymaking (Yanow, 1995; Hajer, 2005). Parties to the policy debate are seen to include some concerns and exclude others in an attempt to guide the course of future action as well as identify what institutions can be involved (Fischer, 2003). Arguably this is similar to agenda-setting theories in the political science literature (Schattschneider, 1957; Daviter, 2007) as it occurs during the policymaking process in the period when some understanding and definitions are discredited while others become dominant (Hajer, 1995). Here the social construction of a policy issue is essentially a political struggle where alternative ways of defining the problem and different suggestions about what should be done are articulated and defended (Gusfield, 1981).

Policy frames

Recognition that the policymaking process is not a purely administrative endeavour but a social phenomenon has led to the incorporation of concepts from other disciplines such as the notion of *frames*. Simply put, frames select some parts of reality at the expense of others in order to make sense of highly complex situations and in doing so govern the subjective meaning assigned to social events (Entman, 1993; Gamson, 1992). Entman (1993), the foremost scholar on frames (Lilleker, 2006), developed the concept through studying the media. Entman considers a frame to be an organising tool, a way of connecting a particular news narrative to other events across time and space (Lilleker, 2006). The concept of a frame has also been deployed in other ways with regards to studies of policymaking as well as to aid policymaking itself. For example, Schon and Rein's (1994, in Fischer 2003) definition of frames is based on narrative and generative metaphors, which apply to a particular actor.

In line with the social constructionist stance outlined above, this research agrees with Entman, that rather than 'belonging' to an individual, frames and the process of framing are dynamic social processes where 'producers and receivers of messages transform information into a meaningful whole by interpreting them through available' social and cultural concepts (Entman, 1993 cited in Fischer, 2003: 144). This suggests that people are capable of

drawing on more than one frame at a time using available social and cultural concepts in order to make sense of complex information and to suggest a course for further action. However, this does not mean that these resources can be drawn on equally. Social structures such as codes of normal behaviour and the agency or ability of individuals to act within or challenge these structures can be important limiting factors (Giddens, 1984). Furthermore, while some actors may be a constant presence in a policymaking domain,

position of the broadcast medium in the broader communications environment was discursively constructed and re-interpreted by policy actors, regulators and managers of broadcast outlets. A similar approach to the policy processes that created community radio could reveal how the sector's identity and position in the broader communications environment has been constructed discursively and re-interpreted by policy actors, regulators and managers of broadcast outlets during the (cycle) of policymaking.

Rather than signalling the death of community radio, the arrival of the Internet clearly demonstrated the benefits and importance of access and communication to those in power.

MSc Dissertation

A four-part approach to theorising community media

Carpentier proposes a four-part model uniting three theoretical models frequently used to conceptualise the identity of community media with the addition of a fourth approach. This model provides a broad overview of identity components of community radio, (1) ties to a particular community; (2) an alternative to the mainstream; (3) part of civil society; (4) community media as rhizome (Carpentier, *et al.,* 2001; Bailey

Civil society

In this part of the model, community radio is positioned as separate from market and state (Bailey *et al.* 2008). The key idea is that community radio is viewed as part of civil society, and can be seen in two ways. Firstly it is viewed as an '"ordinary" part of civil society... one of the many types of organizations that are active in the field of civil society' (Carpentier, *et al.,* 2001: 246). This democratization *of* media allows people their right to communicate. Secondly, they create a space where different civil society groups can participate in debate, thus contributing to democratization *through* media. However, these attempts to position community radio as part of civil society have largely failed (Bailey, *et al.,* 2008). Essentially, the lack of connection to 'strategic alliances' prevented the democratic media discourse from being disseminated (Carpentier, *et al.,* 2001: 2).

Community radio as rhizome

The rhizome, or fourth part of the model, offers a slightly different way of conceptualising

inequalities based on the development of the Internet along the lines of niche subscription services (Tambini, 2006). Arguably, this suggests a potential contribution of community radio; providing broadcasting services beyond that provided by the market and in the citizen interest remains, not in spite of, but because of fragmentation of the media marketplace.

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In the UK, community radio advocates were re-buffed over the years due to concerns about commercial licenses being acquired 'through the backdoor' (Stoller, 2010b). This worry was shared by community radio advocates who realised a pro-active approach to protecting the ethos of the sector.

So, how was the balance found between opposing claims to access with the UK's community radio policy? According to the legislation that drives Ofcom's regulation of the community radio sector, the applicants themselves choose the area and define community the station is to serve. Theoretically this approach is very sensible. By creating a sector that is, subject to approval, defined by those who want to run it, policymakers circumvent the potential for problem of stations being captured by potentially undesirable purposes (for example by neo-Nazis groups) without being prescriptive.

However, this system of licence allocation is not entirely unproblematic. While this approach finds a middle ground between government (or market) control and a 'free-for-all' by passing control off to another group, it also erects a barrier to access. In order to have access to or to participate in or through a community station in the UK, an individual must either have the skills or experience to apply for a licence themselves, or else be part of a community (of interest or of place) where another person in that community group has the skills or experience to apply for a licence.

3.

Considering Majone's (1989) theory of the policymaking process where options are gradually narrowed, a starting point is needed to consider the simultaneous presence (or absence) of multiple identity components. Carpentier's four-part model is adopted for this purpose providing the theoretical starting point for conceptualising the forms community radio can take. The organising principles in this model provided the basis for considering other identity components that were emphasised and de-emphasised in policymaking discussions.

The four-part model informed the research for both the identity components emphasised during the policymaking process as well as the thinking about components emphasised in the 'key commitments' documents. These two stages of thinking about identity components and how they are shaped, was connected theoretically by the idea that during the policymaking process ways of thinking about certain media are explored and then 'put into words' in specific ways (Fischer, 2003). For example, in legislations and regulation the words selected and the particular meaning that policymakers attempt to give these words can inform subsequent interpretations of the place of that media in the broader media system. This is a particularly useful theoretical model to employ in an examination of policymaking when considered as a political phenomenon. The four-part model's connection to radical pluralism explicitly positions community radio as a medium with democratising potential and this arguably this facilitates a connection between this body of normative theory and the approach selected from the literature on interpretive policy analysis.

From theories of media policymaking as a political phenomenon, the concept of a *policy frame* was selected as an analytical model to examine how identity components had been emphasised and de-emphasised by positioning what the objectives were for the new community radio sector and how those objectives would be best accomplished. A policy frame was defined as an analytical model collectively created and selectively drawn upon by participants involved in community radio policymaking issues. It included a series of claims that when considered together lead to conclusions about the problem the introduction of community radio was intended to solve. Frames are created in the process of *framing*, a dynamic process of selection, organisation and emphasis place on aspects of the issue at hand which serve to highlight particular problems and obscure others (Rein and Schon, 1991; Entman, 1993). For the purposes of this dissertation *framing* was defined specifically

as the process of advancing a particular positioning of community radio with related identity components. This definition of framing was informed in particular by Majone's (1989) theories on the role of argumentation in the policymaking process.

In order to focus this research, particular attention was paid to notions of access and

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> **1:** In what ways, if at all, was the identity of community radio framed during the policymaking process?
>
> **2:** In what ways, if at all, are the stated intentions of community radio policy reflected in

interviews the four-part model was used as a way to probe respondents' for their insights into why certain components were omitted. In particular the interviews were designed to cover points of conflict and agreement following Yanow's (1997; 2007) advice for trying to test the limits of a respondent's argument or point of view on a topic. The topic guide was divided into three sections reflecting the debates before the 2004 Order, opinions on the outcomes and general questions about the issue which were intended to provide a measure of checking the responses.

The interview setting and ethical considerations

Following three pilot interviews I decided to follow the approach to interviewing set out in Wengraf (2001), using more specific questions that Wengraf suggests. The interview started with an more informal chat around the respondent's area of expertise. Even though there were some specific questions that needed to be put to each respondent, I wanted to "warm up" those who may not have thought about the issue in a while. Questions about the identity components emphasised early on in the process were also posed earlier on in the interviews, before exploring their opinion on the outcomes. Despite questions being specifically phrased on the topic guide, the interviews were designed to allow respondents to tell their 'stories' of the policy process. As Fischer advises stories, 'frequently based on generative metaphors, link causal accounts of policy problems to particular proposals for action and facilitate the normative leap from "is" to "ought"' (Fischer, 2003: 145). The interviews were conducted reflexively in a conversational manner – probing for greater meaning and allowing some tangents to develop when considered on-topic.

The interviews were conducted in person at the respondents' offices where possible. Three exceptions occurred, and these interviews took place on the phone and one interview also took place at a café near the respondent's office. Face-to-face interviews are seen to allow

1: List of expert interviewees[8]

Name	Institution/Affiliation	Date and location of interview
1. Lawrie Hallett	Ofcom	March 2009 at Ofcom (pilot)
2. Susan Williams	Ofcom	April 2009 at Ofcom (pilot)
3. Steve Buckley	CMA	July 2009 (phone interview)
4. Donald McTernan	CMA	July 2009 at a Café
5. Ed Baxter	Resonance FM	July 2009 at Resonance FM
6. Phil Korbel	Radio Regen	July 2009 (phone interview)
7. Richard Hooper	Radio Authority	July 2009 (phone interview)
8. John Mottram	DCMS	July 2009 at DCMS
9. Tony Stoller	Radio Authority	August 2009 at LSE
10. Anonymous Respondent	Civil Servant	July 2009 at respondent's office
11. Alice Dickerson	RadioCentre	August 2009 at RadioCentre

Interviewer bias can arise by encouraging certain responses, and inaccurately recording responses among other concerns. In order r T J E T Q q 0 . s 1 c s m o u s R e s p o n d T j

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The results and interpretation in this chapter are split into three sections. Firstly, each of the frames is detailed and implications discussed using community radio theory. Next, the stated intentions of the Community Radio Order are briefly detailed. Thirdly, the results of the content analysis comparing 'key commitments' of 15 pilot stations with all 32 stations licensed since January 2007 currently broadcasting[10] are presented and discussed. Finally, the two research questions are directly addressed and answered.

These sub-themes (or supporting lines of argumentation) are all quite different and which is notable because they all contribute to the same positioning of community radio in the debate. They are justified as a coherent frame because all of the arguments explicitly challenge the hegemonic order or 'common sense' view that the market is *always* the most efficient way of doing things. The localness argument demonstrates this most directly: 'it seemed like a way of plugging the localness gap and that really is the central theme of my thinking'[12]. However, this challenge is not a full-frontal assault, it is more of a nibble at the edges.

Four-part model: ie. what does the frame do?   How does it obscure certain identity components? How effective is it?

This frame incorporates many forms of community radio within its boundaries therefore does not obscure any of the other identity components. Access to broadcasting

The second possible reason this frame failed in its attempts was that its arguments were built on the premise that any media not seeking to maximise audience was unjustifiable: 'Is there the demand or interest for public access radio? Would anyone listen?   If no-one listens there is no point in doing it!'[17]. This suggests that audience maximisation *ought* to be the basis on which radio stations are judged.   However at the same time the same

simultaneously place the sector in a marginalised position through a focus on the similarities between the two sectors in a (mostly) non-antagonistic relationship.

Four-part model: ie. what does the frame do? How does it obscure certain identity components? How effective is it?

The 'problem' is no longer a media one, so there is very little for community radio to be in competition with. Instead, community radio is positioned as inherently the same as commercial radio inherently and from this position appeals to further restrictions of the sector are validated. Laclau and Mouffee's (1985) theory suggests that threats to political identities are negotiated through attempts to subsume and incorporate the identity of the 'other' in a space of non-difference. The arguments in this frame are based on the premise that community radio needs to be *made to be* different from commercial radio. By denying the identity of community radio as *inherently* different this it not only de-emphasises the alternative aspects of community radio, but it also leads to the conclusion that community radio needs to be *made* to be different because otherwise it will become commercial radio thus justifying regulatory restrictions.

Frame 4: 'radio with a social purpose'

Intro to frame: positioning/problem/uniqueness

In 'radio with a social purpose' community radio is positioned as a solution to a more specific media problem - that of access for the poor and/or the socially excluded. Even though and community media advocates tactically adopted the language of 'social regeneration' – a popular discourse in government during that period[19] -

delivering social gain to the public *through* its function as a communications medium. Compare this to the next frame where the social gain is achieved regardless of realisation through a radio medium.

Argument 1: old left

A series of premises positing community radio policy as the last gasp of old-style broadcasting policy leading to the conclusion that community radio could contribute to social equality.

Argument 2: pragmatic decisions

reframing of community radio's identity, from a communications media to a social policy delivery mechanism.

Definition of social gain

> *In relation to community radio service, "social gain" means the achievement in respect of individuals or groups of individuals in the community that the service is intended to serve, or in respect of other members of the public, of the following objectives:*

By the time of Order the potential of community in terms of alternative content provision (or access to content) became de-prioritised as the problem was reframed as a social problem. This de-prioritised the cultural role of 'dangerous' radio (so feared in the 1980s yet celebrated to a certain degree in the Access pilot stations). This positioning of community radio made it non-competitive with other stations, while the focus on 'deliverables' served to de-legitimise certain demands for alternatives. As the literature notes, this is also achieved by trivialising such output (Bailey *et al.,*

The intentions as stated in documents and in interviews were:

- Deliver on social policy objectives
  - Education
  - Social inclusion
  - Social regeneration
- Create a distinctive sector
  - Why
    - Not in competition with commercial radio
    - Freedom for all types of stations to acquire licences
    - Protect community radio
    - Prevent 'commercial stations by the back door'
  - How
    - Lots of different types of stations - 'let a thousand flowers bloom' with some constraints
    - Not-for-profit
    - Access/participation

Putting clearly defined social gain criteria in the Order was a means of achieving some of these objectives[27]. The specific definition was the result of much negotiation and became one of the tools used by Ofcom in licensing and regulating community radio stations. The stated intentions focussed on by the second research question are: access and participation, many of different types of station, and preventing commercial radio by the backdoor (ie. to prevent applicants who are unable to obtain commercial licences from obtaining community licenses instead). The policy outcomes were analysed to identify whether they achieved the desired objectives.

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[27] Interview with civil servant

To examine the research question regarding policy outcomes, Pearson's chi-squared test was used to determine if there were dependencies between a number of variables and when a station was licensed (access pilot or second round). The variables were:

- Access to means of content production (making radio)
- Participation in station management
-

involves two-way participation between equals (Bailey, *et al.*, 2008). Furthermore it raises questions about why 'access' was not included in the social gain criteria despite being raised by the CMA.[28]

Participation in management

The chi-squared test was not significant and also it was unreliable due to low counts in a number of the boxes. Examining the cross-tabs did not reveal any clear differences between the two groups (see Table 3).[29]

Diversity of (music) output[30]

There is evidence ($P < 0.05$) that the null hypothesis of independence between these variables can be rejected, and thus there is an association between these variables.

The cross tab (Table 4) indicates that there is 37.4% decrease from pilot to second round stations in the proportion of stations that have some niche (for example, specialty shows targeting a particular population) output.

This reflects a lower level of proposed music output diversity in terms of both *internal pluralism* and *external pluralism* for recently approved applications. In some respects this could be reflective of less demand for such content, but the theory on re-framing and meaning created in policymaking suggests that de-prioritisation of certain identity components could affect outcomes in this way (Yanow, 2005) as social understandings of what the policies objectives changes.
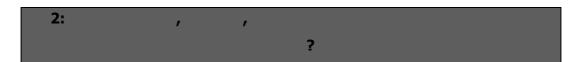
Underserved

While again there were issues with the sample size allowing for an adequate test, the cross-tabs indicate large differences between the profiles of those named as underserved by pilot versus second round stations (see Table 5). There is a 41.7 percentage point increase in the proportion of second round stations that claim local news/traffic/weather as their community radio offering. At the other end of spectrum, three second round stations directly cited access to broadcasting as the main provision.

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[28] Email correspondences between Steve Buckley of the CMA and DCMS.

[29] Because the expected frequencies did not satisfy the conditions of Pearson's Chi-Squared test of statistical independence, it is unlikely that the results would be reliable so the results are not reported here.

[30] 'Speech output' was not included as a variable due to difficulties in obtaining valid data as the level of detail regarding speech programming on the key commitments documents varied considerably.

This suggests that the policy has not stopped pseudo commercial stations getting licences. Even though social gain is defined in legislation, it is not a fixed construct. Thus the goal of community radio, specifically its role and position in the broader media landscape, is open to constant re-interpretation. While the flexibility of the social gain aims could work in line with the ethos of community radio's favour, there is no reason why these aims could not be bent to achieve unintended ends. Further evidence for this claim is the approval of a community radio service that openly claims it wishes to 'convert to commercial' licence[31]. This is in conflict with the stated policy intentions and aims to the policy measures.

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The results from community radio station 'key commitments' approved since January 2007 suggest that a less diverse range of stations than represented by the pilot. Stations who do not emphasise opportunities for access as set out in community radio theory can still be approved even if these are essentially 'pseudo commercial stations.' Therefore the objective of maintaining a distinctive tier of radio had not been achieved. One caveat is that the second round of licensing is still ongoing and London community stations have not yet occurred, which could significantly alter the profile of community radio stations in the UK. Future work could look at all applicants for this area both successful and unsuccessful, to determine if the trends noted in this work continue through to the new round of licensees.

Terms such as 'social gain' with ambiguous, yet defined, meanings serve important political functions. While it may have helped reach political compromise, it also enables problematic implications to be hidden (Fischer, 2003). In this study the results were inconclusive, yet varied not just around 'community radio' stations as defined by theory, but to applicants who are open about using this opportunity as a 'back door' to operating a commercial radio station.[31]

It could be argued that the policy outputs may have been insufficiently clear as the flexible approach to applying the social gain criteria in licensing community radio stations and regulating the sector seems to be in conflict with the second stated policy aim of ensuring

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[31] The SuperStation in Orkney (a station licensed in the first round so not included in this analysis) states on their community radio application form that they wish to become a full commercial station in the future.

that community radio remained distinctive. The content analysis of recent 'community radio' applications which were approved for licences are not all in the spirit of this sector. The results also suggested that there are many stations emphasising access to and participation in and through the medium of radio. The results suggest that a 'distinctive sector' has been created despite of these restraints rather than because of them.

While these findings are similar to those of Scifo who examined the potential influence of New Labour's 'third way' project on community radio, this paper has made one of the mechanisms – policy frames - at work in the policy process explicit (2008). This suggests that a conflict over the meaning of what community radio is intended to do may be a cause of the funding and recognition problems the sector is currently experiencing.

6.

This dissertation examined the community radio policymaking process from 2000 - when the regulator suggested a new 'third tier' of radio to government - up to the 2004 Community Radio Order and the subsequent development of the sector.

The results of this research support Freedman's contention that media policymaking fosters certain types of media structure and behaviour whilst suppressing alternatives (2008). This study showed that the norms and goals developed in the community radio policymaking process re-orientated the purpose of these broadcasters towards explicit social policy-rather than media policy-goals. This complicated the structure of the new sector because it placed community radio in several different policy domains at once and removed a common base on

An examination of arguments put forward during the process revealed five distinct policy

Scott, J. (1990). *A Matter of Record*. Cambridge: Polity.

Selwyn, N. and Fitz, J. (2001). The Politics of Connectivity: The Role of Big Business in UK Education Technology Policy. *Policy Studies Journal* 29(4): 551-70.

Selwyn, N. (2007). Curriculum online? Exploring the political and commercial construction of the UK digital learning marketplace, *British Journal of Sociology of Education* 28(2): 223-40.

Shuy, R. (2003) In-Person Versus Telephone Interviewing. In J. Holstein and J. Gubrium (Eds.) *Inside Interviewing: New Lenses, New Concerns* (pp. 175-93). Thousand Oakes, CA: Sage.

Stoller, T. (2010a). Left of the dial. In *Sounds of Your Life: the rise and fall of independent radio in the UK* (p. 154-161). London: John Libby, forthcoming

Stoller, T. (2010b). RSLs and access radio. In *Sounds of Your Life: the rise and fall of independent radio in the UK* (pp. 316-28). London: John Libby, forthcoming

Tambini, D. (2004). The passing of paternalism: public service television and increasing channel choice. In D. Tambini, and J. Cowling (Eds.) *From Public Service Broadcasting to Public Service Communication* (pp. 46-60). London: IPPR.

Tambini, D. (2006). What citizens need to know. Digital exculsion, information inequality and rights. In E. Richards, R. Foster and T. Kiedrowski (Eds.), *Communications the Next Decade* (pp. 112-123). See URL: http://www.ofcom.org.uk/research/commsdecade/ (Last accessed 20 April 2010)

Tunstall, J. (2004). The United Kingdom. In M. Kelly, G. Mazzoleni, and D. McQuali (Eds.), *The Media in Europe* (pp. 262-274). Sage Publications.

van Cuilenburg, J., and Verhoest, P. (1998). Free and Equal Access: In search of policy models for converging communication systems. *Telecommunications Policy* 22(3): 171-81.

van Cuilenburg, J., and McQuail, D. (2003). Media Policy Paradigm Shifts: Towards a New Communications Policy Paradigm. *European Journal of Communication* 18(2): 181-207.

Wall, T. (2000). Policy, pop, and the Public: The Discourse of Regulation in British Commercial Radio. *Journal of Radio Studies* 7(1): 180-95.

Wallace, D. (2008). Reinventing the Wheel vs. Grinding the Same Old Axe: An Ethnographic View of the Students and Community Members at a Massachusetts College Radio Station. *Westminster Papers in Communication and Culture* 5(1): 44-66.

Wengraf, T. (2001). *Qualitative Research Interviewing.* London: Sage.

Yanow, D. (1995). Practices of policy interpretation. *Policy Sciences* 28(2): 111-26.

Yanow, D. (1997). Passionate humility in interpretive policy and administration analysis. *Administrative Theory and Practice* 19(2): 171-77.

Yanow, D. (2007). Qualitative-1992 681.6 f [(ET Q q 0 0 0 0 0 0 0 0 0 083 265.62 cm B /F6.0(3 26) 12Mcm B/F6.0(3