



**A Public Service Broadcasting Fund for Independent Radio Stations
A Scheme Proposed by the Independent Broadcasters of Ireland (IBI)**

January 2014

Summary:

Over the past two years the Independent Broadcasters of Ireland (IBI) has campaigned for a fair and equitable system of funding for public service broadcasting (PSB) in Ireland. Our members are the main source of local and national news, sport and current affairs on radio for 70% of the population and because of the structural changes in the advertising market that have impacted on the funding of independent radio, these services are under threat.

The introduction of the new Public Service Broadcasting Charge will result in additional revenue being collected for the purpose of funding PSB. In this paper, we outline a new scheme that proposes to utilise approximately half of the additional revenue collected in a new fund to support PSB on Independent stations. We propose that state owned broadcasters including RTÉ would also receive an increase in funding via the expected uplift.

The Government is currently preparing amending legislation to the 2009 Broadcasting Act to allow for the introduction of the new charge. This legislation should address the issue of allocation of the fund and provide for this new scheme proposed by IBI.

Introduction to the Independent Broadcasters of Ireland

The Independent Broadcasters of Ireland (IBI) represents the 2 national, 4 regional, 1 multi-city and 27 local commercial radio stations throughout Ireland. The mission of the IBI is to promote a strong and vibrant radio sector which reflects the preferences and needs of the listening public. Within our membership there exists a broad collection of radio stations – significant diversity in ownership, target audience, location and franchise area. These independent broadcasters make a significant contribution to the Irish economy and to the social and cultural life of the country.

Listenership to independent broadcasting in Ireland has never been stronger. In excess of 70% of the Irish population, 2.5 million people, tune into independent radio on a daily basis, which clearly shows the value listeners place on our programming. Independent radio provides a valuable public service to Irish radio listeners and is currently funded entirely from the sale of advertising and sponsorship.

Key facts about independent broadcasters:

Station	Station Type	Ownership	Employees
Radio Kerry	Local	Radio Kerry Group	65
Clare FM	Local	Clare/Tipp Group	29
Galway Bay FM	Local	Connacht Tribune	44
Midwest Radio	Local	Local investors	41
Ocean FM	Local	Local Investors	50
Highland Radio	Local	Local Investors	76
Northern Sound	Local	Radio Kerry Group	20
Shannonside	Local	Radio Kerry Group	35
Midlands 103	Local	Tindle Group	40
KCLR 96FM	Local	Local Investors	31
KFM	Local	Local Investors	34
Tipp FM	Local	Clare/Tipp Group	31

LMFM	Local	UTV Radio	50
WLR FM	Local	Landmark Media Investments & Des Whelan	61
South East Radio	Local	Local Investors	34
East Coast Radio	Local	Local Investors	37
Cork's 96FM & C103	Local	UTV Radio	81
Limerick's Live95FM	Local	UTV Radio	46
Cork's Red FM	Local	Landmark Media Investments, Vienna Holdings & other investors	39
98FM	Dublin Local	Communicorp	50
FM104	Dublin Local	UTV Radio	69
Q102	Dublin Local	UTV Radio	52
Sunshine 106.8	Dublin Local	Local Investors	26
Phantom 102.5	Dublin Local	Communicorp	25
Radio Nova	Dublin Local	Local Investors	35
Spin 1038	Dublin Local	Communicorp	38
4FM	Multi-City	Local Investors	37
Spin South West	Regional	Communicorp	26
Beat 102103	Regional	Landmark Media Investments & Des Whelan	36
IRadio	Regional	Local Investors	33
Newstalk	National	Communicorp	105
Today FM	National	Communicorp	70
IRS	Saleshouse		12
Communicorp	Head Office		11
UTV Radio Solutions	Saleshouse		14

Overall employment in the independent sector: 1,483

Many of these jobs are in rural communities and are of huge importance to local economies.

Average annual turnover for a typical local station

Average annual turnover ranges from €1.5m - €1.8m, of which wages represent over 50%. Virtually all the turnover of local radio stations is spent in the local economy. Independent local radio stations that have a city in their franchise area and national radio stations have significantly higher turnover.

Average margin

According to the 2010 BAI report on the Broadcasting Landscape, in 2007-2008 Irish radio stations had an average operating profit margin of just 4%.

Listenership

Independent radio is the preferred source of news and information of 70% of the population right across the country.

Franchise Area	Any RTÉ Station	Any IBI Station
Dublin	40%	60%
Kildare	37.8%	62.2%
Louth & Meath	31.9%	68.1%
Carlow & Kilkenny	31.8%	68.2%
Laois, Offaly & Westmeath	37.6%	62.4%
Wexford	30.6%	69.4%
Wicklow	46.6%	53.4%
Cork	28.8%	71.2%
Kerry	25%	75%
Limerick	27.2%	72.8%
Tipperary	25.3%	74.7%
Waterford	23.5%	76.5%
Clare	21.9%	78.1%
Galway	32.2%	67.8%
Mayo	21.6%	78.4%
Roscommon, Longford & South Leitrim		
Cavan & Monaghan	27.6%	72.4%
South Donegal, Sligo & North Leitrim	23.2%	76.8%
Donegal North	16%	84%

JNLR Results Jan 31st '13. Weekday Market Share 7am - 7pm. Source: JNLR/Ipsos MRBI/ 2012-4.

Independent Public Service Broadcasting – The Context

There is no definition in law in Ireland of public service broadcasting. Until recently it was loosely defined as anything broadcast by a state owned broadcaster whether it was a popular music programme or a news bulletin.

UNESCO's definition of public service broadcasting reads as follows:

Public Service Broadcasting (PSB) is broadcasting made, financed and controlled by the public, for the public. It is neither commercial nor state-owned, free from political interference and pressure from commercial forces. Through PSB, citizens are informed, educated and also entertained. When guaranteed with pluralism, programming diversity, editorial independence, appropriate funding, accountability and transparency, public service broadcasting can serve as a cornerstone of democracy.

All broadcasters in Ireland, both state-funded and independent, are also commercial broadcasters in that commercial revenue from advertising and sponsorship is required to ensure adequate operational funding is available. IBI has however long advanced the case that Independent stations are also public service broadcasters.

In the past year, the Minister for Communications has recognised the reality that PSB is about the content broadcast rather than the ownership of the broadcaster. So there is no longer any argument

that the national and local news, sport and current affairs broadcast by independent stations is PSB and is equally as valuable to Irish society as PSB broadcast by state owned broadcasters.

The 1988 Broadcasting Act set out the framework for the development of independent radio in Ireland. Central to the development of the new sector was the obligation on all independent radio broadcasters that 20% of content comprise “news and current affairs”.

The independent sector fully accepted this requirement and through imaginative and creative programming developed a country wide independent radio service which has become the primary source of radio listening for nearly 70% of the Irish public on a daily basis. This is achieved through localised programming that reflects the lives of the communities it serves; responds to the needs and interests of those communities; provides a forum for news, information, local sports coverage, discussion, debate and interaction that is not replicated in any other media format in this country.

Regardless of the ownership of the companies providing the service, the facts are undeniable: independent radio is providing a service to the public that is widely used; performs a vital role in society and has become an integral part of local identity in every county in the country.

The Broadcasting Act 2009 outlines the commitment required by independent radio stations to news and current affairs.

39. (c) in the case of sound broadcasters a minimum of –

- i. not less than 20 per cent of the broadcasting time, and
- ii. if the broadcasting service is provided for more than 12 hours in any one day, two hours of broadcasting time between 07.00 hours and 19.00 hours,

is devoted to the broadcasting of news and current affairs programmes, unless a derogation from this requirement is authorised by the Authority under *subsection (3)*,

Independent radio broadcasters are also required under the Broadcasting Act 2009 to provide the public with certain categories of programming. For independent radio stations this includes a requirement to:

- Broadcast programmes in the Irish language;
- Broadcast programmes relating to Irish culture;
- Offer broadcasting opportunities for new talent in music, drama and entertainment;
- Provide a diversity of services catering for a wider range of tastes including minority interests;
- Serve local communities or communities of interest.

In addition to these stated obligations, independent broadcasters are subject to a range of further obligations including:

- Providing air time free of charge to inform the public when matters of important public interest arise. It is now established practice that stations provide free airtime for important public debates including referendum campaigns by the Referendum Commission.
- Making the airwaves available to the State and ensuring continuity of service on occasions of national emergency.

- In contrast to other media including newspapers, online and outdoor, licensed independent radio is subject to a strict commercial advertising code that limits its ability to compete for revenue.

In addition to these obligations, local stations, in particular, have also become a vital link for communities in times of severe weather and often the only source of information on local road conditions and school closures.

The schedules of the majority of the independent radio stations include significant Irish language content and a wide range of programmes on farming, religion, traditional music, folklore, history and heritage.

Independent radio stations have also developed an important role in relation to local democratic engagement and perform many important functions in relation to countless local communities, organisations and individuals throughout the country. From its inception the sector has performed a role that cannot be performed by the State Broadcaster RTÉ. Regardless of the future of the sector it will never be possible for the State Broadcaster to replicate the services provided by independent radio in Ireland. The sector provides a unique localised service to this country and our two national member stations, Newstalk and Today FM provide a vital counterbalance to the editorial monolith of RTÉ.

The Communications Revolution and the Recession

The recession of the past 5 years has shaped and accelerated fundamental changes in the media market. Not only have total revenues fallen, to the detriment of all media, but the structure of the market has permanently changed, making a return to the levels of revenue enjoyed 5 years ago unlikely.

The independent radio sector developed in a context where the main mass marketing media available were radio, television and print. Throughout the first 10 – 15 years of its existence while competition was intense the paradigm in which media operated was by and large a national one.

The advent of globalisation, the explosion of the internet and the consolidation taking place across retail, marketing and services has completely changed the world as we know it. International and trans-national media are burgeoning with Google, News International, Twitter, Facebook and other mega corporations proudly disrupting and destroying “traditional” media on the back of automated content, a low cost base and internationalised operations that are beyond the control of regulators and Governments.

How people consume media and where they access news and information has also changed radically. Over 60% of the population have smart phones and more and more content is now accessed via these and other mobile devices.

While digital media are taking an ever increasing share of advertising spend, traditional media including newspapers and TV are now under intense pressure.

Newspapers sales have dropped significantly with local newspapers down as much as 20-30% in circulation. Readership is ageing and free online content is undermining the business model.

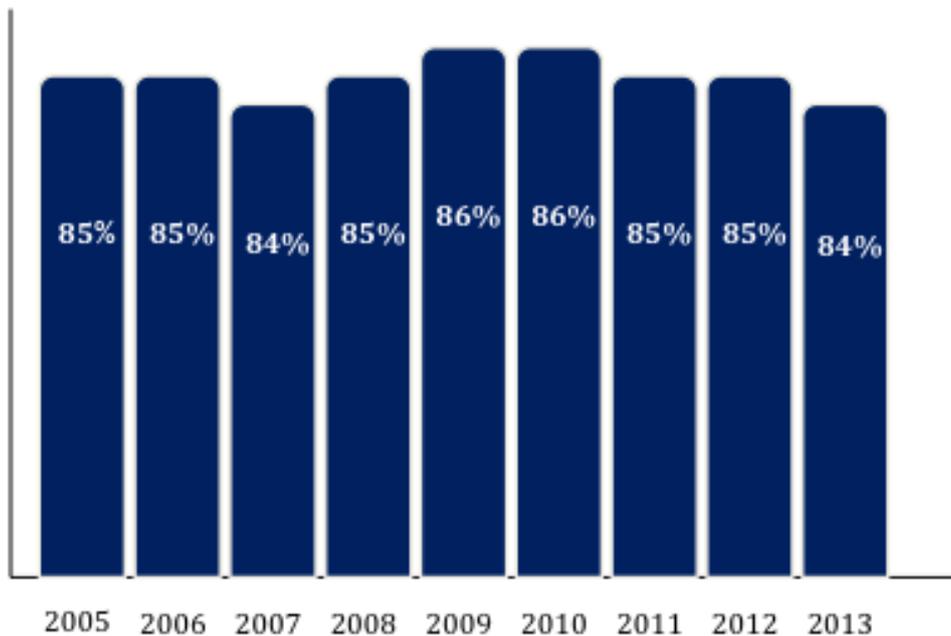
The television market has also been fundamentally changed with fragmentation of audiences and of revenue. In just 10 years the number of channels selling dedicated TV advertising in Ireland has grown from 6 to over 30. The oversupply of space has driven rates down to levels that can only be sustained by large multinational operators.

Number of commercial TV stations: 2001-2013



Amidst all of this change, radio has been remarkably robust in term of listenership. The same proportion of adults listens to radio every day now as they did 10 years ago. FM radio sits firmly within national borders and is not subject to the same influence from UK and multinational media companies as newspapers or television.

Daily listenership: Adults



*Source: JNLR July-June reports

The issue for independent radio amidst all this change is not audience, it is the increasingly difficult problem of how to continue to fund the high cost news and current affairs that it is obliged to broadcast under the Broadcasting Act.

The largest cost in operating a radio station is wages and within this, news and current affairs is the most labour intensive. Programmers, journalists, researchers and producers as well as back up administrative and technical staff command a disproportionate share of every station's budget.

The past 5 years has seen relentless pressure on costs as stations have adjusted to the new realities of a radically changed media market.

A number of youth stations have had to be given derogations from the 20% commitment in order to remain viable. While the BAI is to be commended for acting quickly to support these stations, the longer term consequences of removing this content from youth services will be a less informed and less connected young adult population.

A policy that, through the licence fee, exclusively supports news and current affairs on state owned broadcasters that serve less than 30% of the population while failing to provide any support for broadcasters responsible for providing these services to the remaining 70% is no longer tenable.

Irish people's connection to the political, democratic, economical and social life of our country is largely through our media. If for example we were to get to a stage where our only source of news was Sky News or Fox News then we would have lost our connection to the democratic process in Ireland.

Radio is the cornerstone to retaining our identity and staying connected to what matters. Radio is an indigenous medium that does not transfer in the same manner as television, newspapers or websites, a fact that is proven by the high levels of listenership to Irish radio stations despite the availability of radio stations from all five continents. Radio's key attributes are its local focus, its relevance to the lives of its listeners, its ease of access and it is free to the end user. Local radio in particular in Ireland is unique both in its content, its strong focus on the locality that it broadcasts to and its very high listenership levels.

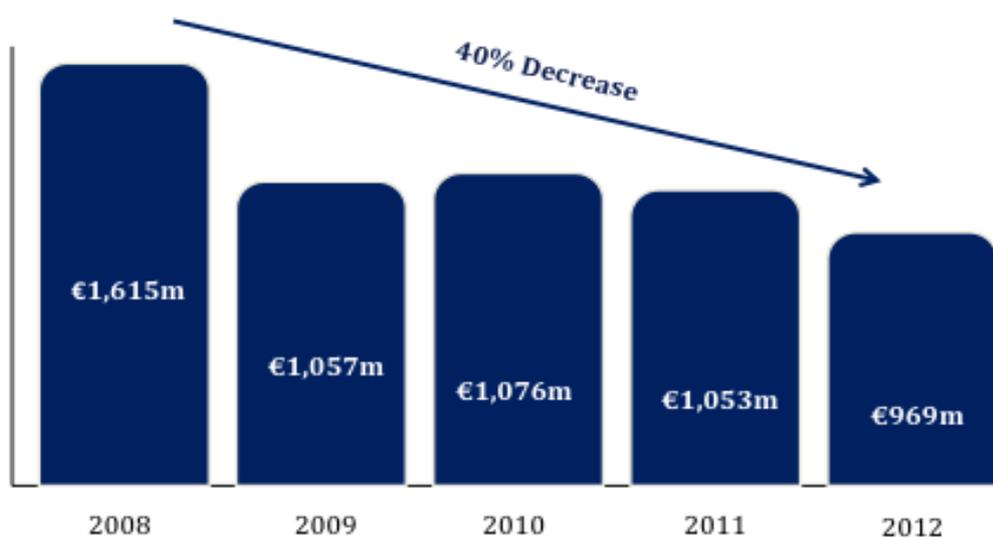
The Advertising Market:

Independent radio in Ireland is currently completely reliant on commercial revenues to fund broadcasting and operational activities. The collapse in advertising spend on radio has directly affected both RTÉ and independent broadcasters. While RTÉ is affected by the decrease in advertising it is largely protected from financial repercussions through the revenues received from the television licence fee.

Independent broadcasters do not have this level of security and despite this must maintain a consistently high standard of programming regardless of the financial position of the broadcaster. Any reduction in broadcasting quality will result in lower audience figures and thereby even lower advertising revenues. Independent broadcasters cannot pass the extra costs of running their businesses to the end user as the consumption of radio is free. The financial losses incurred as a result of the marked decrease in advertising revenues, have been borne by the broadcasters causing concern regarding viability.

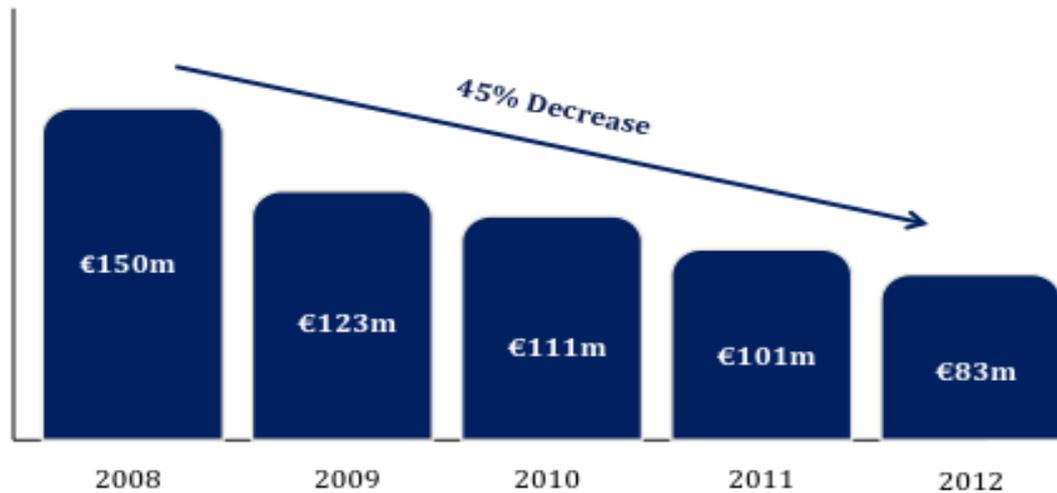
The total Irish advertising market contracted by 40% between 2008 and 2012 with the radio market suffering a drop of 45%.

Total adspend: 2008 - 2012



*Source: Nielsen Ad Dynamix / IAB

Radio Adspend: 2008 - 2012

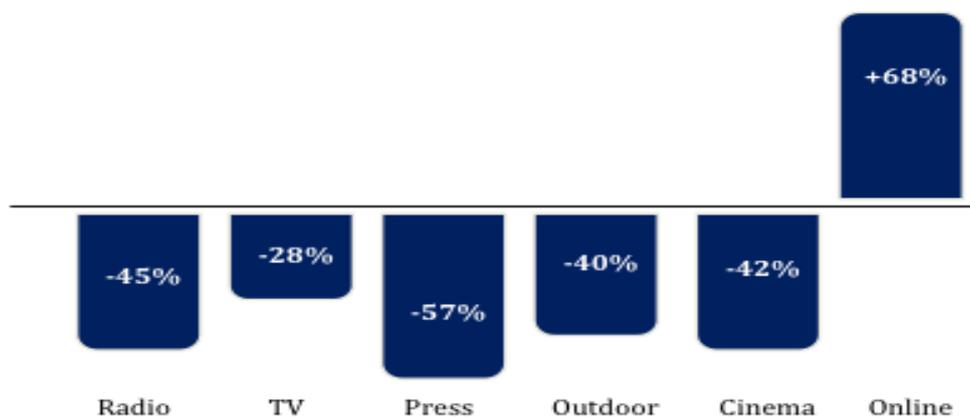


*Source: Nielsen Ad Dynamix / IAB

Depressed economic conditions have clearly been a major factor in this but the rise in commercial popularity of web, mobile and social media channels has accentuated the pressure on traditional media like radio.

These structural changes are permanent and will, if anything, become accentuated in years to come as the digital space becomes more influential. Quite simply, a reliance on the mantra that the recession has only caused a temporary reduction in advertising revenues and everything will soon return to normal, is unsustainable.

Adspend: 2012 versus 2008



*Source: Nielsen Ad Dynamix / IAB

The Television Licence Fee:

Television licences were first introduced in Ireland in 1962 to cover the costs of the establishment and running of what was then Teilifís Éireann, now RTÉ. Given the absence of other broadcasters in Ireland at the time the entire amount of the licence fee collected was allocated to Teilifís Éireann.

The Irish Radio and Television Act 1988 changed the broadcasting landscape in Ireland with the introduction of independent radio and television stations. When introducing the bill in the Dáil, then Minister Ray Burke described it as public service broadcasting in private hands and he proposed 25% of the television licence revenue be allocated to independent broadcasters, a suggestion that was rejected by Government. In its place the Government implemented a cap on the advertising revenue that could be generated by RTÉ but this cap was removed in 1993.

With the growth of independent broadcasters in the 1990s, to include national and local radio stations and an independent television station, and the collective strength of these broadcasters, efforts began again to distribute some of the television licence fee to independent broadcasters. The result of these efforts was the Sound and Vision Fund, announced by then Minister for Communications Dermot Ahern in May 2003. This represented 5% (Broadcasting Act 2009 increased this to 7%) of the revenues collected from the television licence fee being set aside to cover the costs associated with making specific programmes by any broadcaster or programme maker. This set a precedent by which the television license fee could be accessible to broadcasters other than RTÉ for the production of programmes of a public service nature.

The Sound and Vision scheme specifically excludes news and current affairs programming and has largely failed in the original aim of supporting the core programming activities of independent radio stations. Radio broadcasting by its very nature is predominantly live programming, is extremely flexible in its programme topics and is topical in its focus and its output. None of these characteristics are considered in Sound and Vision and the result is a scheme that is not appropriate to the programming which is produced by every independent radio station for in excess of 18 hours each day, seven days each week, 52 weeks each year. By omitting to take this fast moving and ever changing environment into consideration the Sound and Vision scheme is largely unworkable and unusable by many independent radio stations. The reality of Sound and Vision is a scheme that is too restrictive in its application, too onerous in its execution and that does not work for independent radio broadcasters.

In 2012, 59% of the fund went straight back to state owned broadcasters, 7.25% to community stations, 27.5% to independent TV and just 6.2% directly to independent radio.

In 2011, RTÉ received €184m in licence fee income which represented approximately 50% of its total income. A recent report for the BAI by Crowe Howarth, recommended that RTÉ receive no further increase in licence fee income and, over the coming years, the broadcasters commercial mandate be pegged back to reduce its impact in the wider media market.

IBI supports the objective of limiting RTÉ's commercial reach but it is important to recognise that any revenue shed by RTÉ will likely go to national and not local media and do little to address the core issue of how to fund news and current affairs programming on independent radio stations.

Approximately €30m is currently lost each year in licence fee evasion and collection costs. A new system of collection will radically reduce these losses and result in a significant uplift in the amounts collected, even if the €160 fee is left unchanged.

IBI supports the Government's objective of replacing the TV licence with a new household broadcasting charge but only on the basis that the proceeds are fairly allocated among broadcasters who are legally obliged to produce public service content.

We also believe that the new charge should only be used to support public service broadcasting, whether it is on state owned or independent broadcasters. This effectively excludes RTÉ 2FM which currently receives significant support from the television licence fee. In 2012 alone, the state-owned national pop music channel received €6.7m in licence fee monies to subsidise its continued losses.

The Future – The Public Service Broadcasting Fund

The IBI is calling for revenue from the Government’s new Public Service Broadcasting Charge to be allocated to support public service broadcasting on independent radio stations. Such support would underpin the viability of existing services and allow independent radio stations to expand the range and depth of news and current affairs that is broadcast.

A Positive Vision for the Future

In shaping the future of independent radio in Ireland it is essential that future actions are grounded in a positive vision of what it is that we are seeking to preserve and what it is that we are seeking to develop. Accordingly we are setting out the main elements which we believe an Independent Public Service Broadcasting Fund should seek to nurture and develop.

- **Diversity** - reflecting the local, regional and national characteristics of the country
- Broad based and **accessible** – ensuring that access to broadcast media is not confined to small numbers or a privileged “commentariat” in urban centres
- Reflecting, supporting and developing **Irish culture** in all its facets as it grows and develops.
- Reflecting **local identity** and addressing **local concerns**
- Empowering **democracy** and facilitating **democratic engagement** - providing a forum for debate and discussion on local issues. Encouraging participation and providing an outlet for expression and a place for democratic accountability whether during local, national or European elections or through coverage of the activities of Local Authorities – coverage that simply cannot be replicated on a national basis
- Providing **information and coverage of issues**; events and personalities that will never impact on a national agenda but which are of huge significance to discrete audiences
- An **alternative view** – in tune with the local and defined areas to which radio stations broadcast to and reflecting individual points of view
- **Free to air** – content and involvement that is not dependent on subscriptions or behind pay walls
- Ensuring that **content and culture** is not sacrificed in a race to the bottom and a headlong drive for efficiencies in order to maintain viability in a shrinking market
- Where radio operators are rewarded for investing in **quality programming** that services the public good; provides employment and is based on solid public service broadcasting principles
- **News, sport and information** programming is encouraged and is seen as a key driver of business success rather than an onerous cost that must be minimised at every possible opportunity

Objectives of the Fund

The core objectives of the PSB Fund are:

- i. To ensure that the Irish listening public is served by a vibrant indigenous Irish broadcasting sector;
- ii. To allow independent radio stations to deliver diversity in content, programming and information to its listeners;
- iii. To allow independent radio stations offer high quality and innovative indigenous content to the audience;
- iv. To maintain plurality of content and opinion on the Irish airwaves;
- v. To increase the quality of public service broadcasting provided by independent radio stations to the public at national, regional and local level.

How will it operate?

Administration

It is envisaged that the scheme would be administered by the BAI. The Authority has a high level of established expertise gained from many years of monitoring the level of news and current affairs content on stations as well as administering the Sound and Vision scheme. It is important that the fund is administered at arms length and free from political pressure. In this respect, here is a high level of confidence that the BAI is the optimum home for the fund.

Transparency

A clear and precise definition of the programme commitments would be required in addition to the metrics for fulfilling these commitments. Detailed guidelines for the content to be supported, the level of support available, eligible costs and auditing requirements would be clearly set out prior to application. This would enable independent radio stations to ensure that the monies received were not in excess of the cost of providing the public service programming.

Qualifying organisations

Independent professional radio broadcasters with a statutory and contractual obligation to broadcast a minimum percentage of speech programming including news and current affairs, whose listenership is subject to independent measurement by JNLR and who operate under a long term licence awarded by the broadcasting regulator.

Content to be supported

Relevant speech programming including news and current affairs and talk programmes up to a maximum of 20% of broadcast output. Stations with derogation from the 20% level would qualify up to the derogation limit.

Content would include news, sport and information bulletins, current affairs and relevant talk programmes, local and national sports commentary and analysis, Irish language and cultural programmes. These programmes would be produced and broadcast in the context of complying with a Statement of Annual Performance Commitments by radio stations participating in the scheme. (See appendix 1)

Level of support

Qualifying broadcasters would receive up to 75% of the cost of producing and broadcasting qualifying content. Support sought cannot exceed 30% of total operation budget of participating stations and will be capped at a maximum of €400,000/annum for local and regional stations and €1m/annum for national stations. These figures would be indexed to the Public Service Broadcasting Charge. Funding would be provided quarterly in advance.

Eligible costs

These costs would include staffing and overheads including transmission on a pro rata basis. (See appendix 2).

Process for Application

Stations would apply by submitting a three year budget for the full range of operations with a detailed breakdown of the resources committed to news and current affairs including relevant talk programming.

This would be submitted in June each year with the objective of agreeing the level of support to be provided by the end of September. Support would be provided on a multiannual (3 year) basis subject to an annual review. The review would examine whether programming commitments were met in terms of quantity and quality and assess whether funding was correctly spent.

Audit

Before the end of March of the following year an independent audit of operating costs including news and current affairs costs would be submitted to the BAI. This would be carried out by the radio station's auditors as part of the radio station's annual audit.

An audit of compliance with Performance Commitments would be carried out by the BAI as part of its normal monitoring and performance review.

Job creation

The scheme would underpin the sustainability of current activity and allow participating stations to improve the quality of current content production. It would also mean that additional staff could be recruited to increase the quantity of coverage of Councils, Courts and community events.

The scheme would encourage job creation in terms of additional news and sport reporters, researchers and producers. Support of 100% of the cost of employing additional staff would qualify for the first 2 years of employment subject to a maximum grant of €28,000 per job per annum. It is estimated that the scheme would result in approximately 100 new jobs in the first 2 years.

Ensuring the scheme improves quality

The BAI would include content development in its annual work programme and would advise and mentor radio stations in developing and improving programme quality.

Cost of scheme

Working from the Department of Communications, Energy and Natural Resources own figures, it is anticipated that the new Public Service Broadcasting Charge will result in an uplift in the region of €30 million in revenues collected resulting in a total of €230 million. The IBI suggests

that 7% of the total be allocated to independent radio stations under a scheme to assist in the production of public service content and programming.

If all qualifying Independent radio stations participate, it is estimated that the scheme would cost approximately €13-14m/annum.

Is the proposed fund allowable under EU law?

IBI has taken extensive legal advice as well as discussing the scheme with key officials in Brussels. The advice we have received is the scheme can either be exempted from being defined as state aid under the Altmark principles or alternately, defined as state aid but exempted under Article 107(3)(c). We are happy to provide the details of this advice on request.

The full implementation of this new fund will mark a new beginning in local, regional and national independent broadcasting. It will release stations from some of the commercial pressure that is driving decision making and allow the sector to pursue a broader agenda that will benefit the local and national economy.

In keeping with both the European Commission's Sustainable Development Strategy, initiatives outlined under EU2020 and the Irish Government's recently launched Medium Term Economic Strategy 2020, independent radio stations will commit to targeting the following areas.

- **Innovation**
 - Radio stations moving to online platforms and investing in new ideas such as RadioPlayer in order to allow more people to access their radio station of choice regardless of where they are or the type of device they have;
 - Providing increased means of connecting with the audience through social media, outside broadcasts, online broadcasting etc;
 - Recognising the need to talk to people using the communications methods that people themselves are using e.g. snapchat, whatsapp, Instagram.

- **Youth**
 - Need to ensure that young people are informed on news and current affairs within their own area, nationally and internationally;
 - Requirement to increase the level of youth employment which in radio begins at an early stage with work placement for Transition Year students (16 years old). It can also be seen in media and broadcasting courses designed and operated between radio stations and third level institutions.

- **Digital Agenda**
 - Independent radio has a proven track record in investing in and keeping pace with developments in digital media. The sector can and should be a leader within local communities creating new means of communicating and connecting people.

- **New Skills and Jobs**
 - There are already several training centres based in local radio stations including Ocean FM, Radio Kerry, Shannonside/Northern Sound, WLR FM and Clare FM training people from local communities and community groups in broadcasting and social media as well as bringing fulltime students in to the area for accredited courses in Radio Broadcasting;
 - In addition this also provides other broadcasters and indeed the wider media with employees who are fully trained and ready to begin employment.

- **Platform for Social Inclusion**
 - Providing a link to people in rural and isolated areas, people who are living alone, those who are not in a position to mix with their own communities. Independent radio, through its focus on local news and information programmes provides a connection to these people letting them know what is happening in their area, entertaining them and providing company.

Appendix 1:

Draft Annual Statement of performance Commitments:

Strategic objectives:

1. Excellence in broadcasting: Fulfill our public service 20% news and current affairs obligation and strive for the highest standards of journalistic accountability and ethics on and off air.
2. Produce high quality distinctly Irish content that provides diversity and is an alternative to that produced by State owned broadcasters.
3. Manage the finances of Public Service content production in an open and transparent manner so that the service is organised to deliver the best value for money to the Irish public.

Performance Commitment	Metric
Broadcast news and current affairs including talk programming with an emphasis, where appropriate, on a local or regional perspective	Minimum of 20% news and current affairs content as measured in annual performance review equating to 1,752 hours minimum per annum
Coverage of key local, regional and national political discourse	National, local and European election coverage and debates Reports and discussion on County and City Council meetings
Maintain commitment to Irish language and culture	A wide range of: <ul style="list-style-type: none">• Bilingual and Irish language programming, minimum of 52 hours broadcast time;• Programming focused on local and national cultural activities including drama. Minimum of 104 hours broadcast time
Links with education	Establish direct links with second and third level institutions focusing on work experience and media literacy courses.
Increase engagement with local and national sports	Direct links with sports clubs across the main codes and also minority sports. At least 200 hours of indepth coverage. Live coverage of GAA Club and County games. Live commentary (where appropriate) of League of Ireland soccer
Reflect the daily lives and concerns of people living in the franchise area.	Weekly features on health, rural issues including farming (where appropriate), social and consumer issues.
Coverage of religious, community and cultural activities including minority cultures.	For example broadcast coverage of weekly mass/service, live music, coverage of festivals etc

Appendix 2:

Eligible costs:

- Wage costs of staff involved in management and production and broadcast of eligible content pro rata to their involvement. (Eg 100% of the cost of news reporters would qualify but only 20% of the cost of technical support staff).
- Acquisition of national news service – 100%
- Transmission costs (pro rata)
- Rent and rates (pro rata)
- Technical support and maintenance (pro rata)
- Light/heat/insurance/postage/stationery/general costs etc (pro rata)
- Motor/travel (pro rata)
- Phone/mobile/broadband (pro rata)
- Legal and professional (pro rata)
- Training (pro rata)