UK community radio: policy frames and outcomes

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ABSTRACT

This dissertation concerns the formation of the UK's community radio sector. It examines the policymaking process and focuses on how the issue was perceived from competing viewpoints.

Following decades of campaigning, the *2003 Communications Act* and two subsequent amendments by Order provided for a new tier of community broadcasters (Lewis, 2008). This research examines how and why the Radio Authority's early vision for the sector differed in subtle but important ways from the characteristics of community radio as set out in the Order (Radio Authority, 2000; DCMS, 2004). Unusually for media policy this secondary legislation explicitly positioned community radio in terms of social policy problems. The research addresses two questions: (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 the outcomes?

Data from documents and interviews with 11 people involved with this policy issue are used to address the first question. Arguments put forward during the process were examined to identify five *policy frames,* or ways the community radio issue was perceived. These policy frames were then considered in terms of community radio theory and a four-part model of the characteristics ideally associated with community radio was used to consider the *identity components* emphasised or de-emphasised by each policy frame. The results showed which identity components were fostered and which were suppressed during the policymaking process.

The data from a content analysis of *key commitments* documents[1] from 15 pilot stations and 32 successful second round applicants is then considered. These findings suggest that community radio stations licensed more recently are less likely to emphasise non-mainstream output and may also be less likely to emphasise access to and participation in radio as part of their key commitments applications.

Drawing upon the literature concerned with community media as well as the argumentative turn in policy analysis, this dissertation provides insight into how understandings of the role community radio sector are shaped in the policymaking process. It concludes that without vigilance, community radio stations may have different characteristics than those intended when the legislation was enacted.

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[1] These are similar to the format documents required for commercial radio broadcast license holders

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 media because since when is the media about social gain? – Phil Korbel, Radio Regen[2]

1. INTRODUCTION

In 1999 community radio for the UK once again moved onto the institutional agenda of the Radio Authority[3] (Stoller, 2010a). Attempts to create a sector of non-profit, socially focused community stations had been considered by Government previously. In 1985 the Home Office announced an experiment in 21 locations across the UK but cancelled it when a new Home Secretary took over (Lewis, 2008). Then, in 1988 the Independent Broadcasting Authority (IBA)[4] announced licenses for 20 new Independent Local Radio (ILRs) stations with a clear community remit. However, these either failed or became indistinguishable from commercial radio stations[5] due to economic pressure (Lewis, 1993). This research examines the most recent, successful efforts.

In 2000 the regulator made recommendations to Government to approve a trial of access radio stations[6] (Radio Authority, 2000). The 2003 Communications Act included the power to permanently create a 'third tier' of broadcasters by secondary legislation, and community radio was swiftly introduced with the Community Radio Order of 2004 and the establishment of a Community Radio Fund (DCMS/DTI, 2003; DCMS, 2004).

The early vision for the sector was to 'enable public access to radio in new and imaginative ways', a goal aligned with the ethos of community radio, which is often associated with

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[2] Interview, with Phil Korbel July 2009

[3] The Radio Authority was the regulatory body responsible for licensing independent (non-BBC) radio services in the UK between 1991 to 2003 when these responsibilities passed to Ofcom

[4] The IBA was the regulatory body responsible for licensing independent radio services in the UK until 1991

[5] The UK's commercially driven radio broadcasters also operate on ILR licenses. The term commercial radio is used throughout this paper for reasons of clarity.

[6] *Access radio* was the name suggested by the regulator for the new tier of broadcasters due in part to connotations of 'community radio' historically associated with campaigns from the radical left. Access radio was also a way to distinguish the tier from commercial broadcasters who complained that they too provided a community service. The term 'community radio' was adopted during the 2003 Act debates (interview with Tony Stoller, 2009; Lewis, 2008).

inventiveness and social concerns (Radio Authority, 2000). Indeed, earlier attempts to establish the sector in the UK came from the radical left (Stoller, 2010a). The 2003 legislation continued along the deregulatory path as both the 1990 and 1996 Broadcasting Acts had done (Tunstall, 2004). This trend was marked by its pronounced neo-liberalisation rather than liberalising moves for direct citizens' access to broadcasting (Freedman, 2008). Did the (neo) liberalising context contribute to the form taken by the UK's community radio sector? If, as Freedman (2008) argued, the structure and behaviour of media systems is influenced by the policymaking process, could an examination in community radio policymaking process help explain why UK community radio takes the specific form it does?

This dissertation seeks to provide insight into the competing views in the literature that claim community radio is 'made to exist within overall policy arrangements that are antithetical to its design' (Rennie, 2006: 167). On one hand, the neo-liberal paradigm sees the broadcast spectrum as a commodity with the potential for generating revenue. Here, the right to use broadcast spectrum is seen a property right which also justifies controlling access (Rennie, 2006). These proponents would ask, why allow community radio the right to use broadcasting spectrum? Why not auction it off to the highest bidder? On the other hand, advocates of community radio, might see this type of broadcasting as way of contributing to social equality. For the radical left, this means 'the people' having control over the means of media production and distribution (Stoller, 2010a). In this view, broadcast spectrum is a publicly owned resource where the right to its use should not be the preserve of a powerful few.

This research is inspired by a social constructivist approach to policymaking (Yanow, 1995; Fischer, 2003). Recent investigations adopting this approach have brought insights into how concepts acquire and develop meaning using *policy frames* (see for example Hoffman, 1995). In particular this dissertation employs concept of *framing* policy issues through the use of *argument* to critically assess how the type of community radio sector intended was arrived at and to what extent this meaning of community radio has constrained the sector's development (Majone, 1989). Mukherjee (2000), for example, uses the concept of *policy frames* to examine how the term 'privacy' was defined and re-defined during American policymaking debates related to CallerID technology. In other domains, similar approaches have suggested that the construction of digital technologies during policymaking in 'ambiguous yet structured ways' has limited the *outcomes* (Selwyn and Fitz, 2001; Selwyn, 2007).

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 objectives were agreed; and (3) the type (or identity of) community radio that the policy objectives aimed for compared with actual outcomes.

Through a layered analysis of the above policy and community radio theories, this dissertation examines the arguments put forward during the policymaking process for their potential contribution to policy frames.   Then, through the lens of community radio theory the implications of such frames are considered. Given that the political context influences media policymaking and this can affect the structure and behaviour of media systems (Freedman, 2008), an examination of community radio's formative period is interesting, if only to illuminate certain features of the sector as functions of political compromise rather than as an historic necessity.

2. THEORETICAL OUTLINE

This chapter proceeds in four sections. The first briefly considers two different approaches to analysis of policymaking and then introduces the concept of *frames*. This leads to a short discussion of the implication of meaning as negotiated in the policymaking process on *outcomes*. In the second section, normative theories of community radio are introduced and analysed for their usefulness in considering a wide range of potential forms which community radio can take. The third section examines the particularities of the UK situation which leads to the two research questions addressed in this dissertation. Finally, the conceptual framework is outlined and rationale for research stated.

Policy theory

A political process approach to analysis of policymaking can emphasise explanations of the context of policymaking, sometimes drawing on an idealised pluralist conception of a relatively open process where conflicting parties compete for advancement of their own interests (Parsons, 1995). Freedman's (2008) use of the political process framework incorporates both the pluralist view alongside a more critical neo-liberal perspective. This contrasts to more traditional approaches to policymaking, which see the endeavour as 'purposive', rational or objective and where facts are weighed and decisions taken (Hill, 1997; Parsons, 1995; Yanow, 1995). However, the incorporation of social aspects into the study of policymaking has proved useful. Freedman's (2008) study, for example, examined how conflict in policy debate normalised and marginalised ideas. Furthermore, this consideration of debates during the 2003 Act—a formative time for community radio policy— is useful in providing a contextualisation of community radio policy debate.

Policy arguments are one strategy employed by policy actors to set the agenda (Majone, 1989). Majone's (1989) perspective of the policymaking process is that what begin as general concerns regarding a policy issue - through the process of argumentation - become concrete decisions. Argumentation is defined a process of reciprocal persuasion where parties to a policy discussion adjust their perspectives in order that a compromise can be reached and policy choices made. Of note, 'conditions are seldom so compelling and so unambiguous that they set the policy agenda or dictate the appropriate conceptualisation' (Majone, 1989: 23). Arguments are deployed to persuade the other parties involved in

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, others may be only temporary players. Thus, not all parties to the debate have equal power to frame or re-frame an issue. The concept of re-framing, if successful, brings about a change in the way a policy issue is perceived. Fischer's (2003) work—which is itself 'reframing' the approach to studying policymaking—defines the reframing strategy as changing the underlying issues to order to reach a desired outcome or settle a conflict.

Gramsci's concept of hegemony is also offered here as a way to think about the ideological and political aspects of discourse (Laclau and Mouffe, 1985; Fairclough, 1992). Hegemony entails a 'process of moral, philosophical, and political leadership that a social group attains only with the active consent of other social groups' (Gramsci 1971 in Artz and Yahya 2003: 10). As a process of 'common sense' making, it is not static but constantly renewed and can be altered and resisted. Even though Gramsci's concept is focused primarily on power over society by a defined economic class working with other social forces, it is useful in thinking about how powerful groups can come to define things and then how these definitions come to be seen as common sense (Gramsci, 1971 in Fischer, 2003). In this research the concept of hegemony is useful for understanding how discursive social practices can potentially influence the structure or norms of a group and specifically how terms such as 'social gain' came to be defined in communications legislation.

From policymaking to outcomes

Scholars examining other areas of UK policymaking such as education have theorised that the impact of changing political contexts and the meaning of certain words can impact the policy outcomes. *Policy outcomes* are generally defined as 'the result of implementation of a policy. Outcomes can be either intended or unintended, positive or negative' (Birkland, 2005: 158). Mukerjee builds on cultural theories to argue that during policymaking '[s]ocial constructions of new technologies are "put into words" in specific ways within popular culture…. they are also made known in salient ways in public policy proceedings on new communications technologies' (Mukherjee, 2000: 470-471). Wall's (2000) research into the discourse of regulation in British commercial radio suggests that both the identity and

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.

Community Radio Theory

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. The global reach of the Internet made two-way communication and 'user generated content' valuable offerings and community radio was seen as exciting again! (Coyer, *et al.,* 2007). The idea of community radio has been embraced in various ways since the 1970s (Lewis, 1993). In general two ideals underpin the ethos of community radio. Firstly, following Brecht, community radio is seen as a tool of communication rather than a tool of distribution (Carpentier and Scifo, 2009). Secondly, community radio embraced the ethos of a right to communicate - conceived of as a two-way process (MacBride Commission, 1980: 172; in Carpentier and Scifo, 2009).

Defining community radio

The set of characteristics which makes community radio recognizable can be summed up by AMARC-Europe's broad definition of 'a "non-profit station, currently broadcasting, which offers a service to the community in which it is located, or to which it broadcasts, while promoting the participation of this community in the radio"' (1994: 4, quoted in Bailey *et al.,* 2008: 7). From this broad definition, many different types of stations are considered to be community radio. Therefore, capturing an exact 'identity'[7] for community radio is no easy task.

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[7] Identity is taken in this research to refer to 'the collective aspect of the set of characteristics by which a thing is definitively recognisable or known'.

Theoretical perspectives

Scholarly research on community radio employs a variety of particular theoretical perspectives. Lewis (1993) identifies three broad theoretical approaches by their conceptual underpinnings: pedagogical (building on the work of Freire, 1970), the public sphere (Habermas, 1989) and those that attend to the right to communicate. The choice of theory is crucial because it can lead to certain aspects of this type of media being examined resulting in one particular conception being privileged over others. A recent ethnographic study of college-community station WMUA in Amherst, Massachusetts, illustrates well this problem in more detail. By using Habermas' (1989) concept of the public sphere (with its emphasis on consensus) to examine the 'clash' of interests between community members and students who volunteer at the station, the author highlights, *and* problematises, the internal struggles at the station (Wallace, 2008). This approach therefore places the normative role of community radio as a consensual space. This issue with theory choice can cause problems for policymakers as well because there is great difficulty in creating rules for such an elusive form of media. As Rennie asks, 'on what common ground can policy act?' (2006: 179).

One answer to Rennie's question is to start with the broad goal that community stations themselves often gather round: their democratising potential. This has been the starting point for many of the research endeavours into community radio (Jankowski, 2002). However, this apparent agreement on the democratising potential of community media still presents problems because of underlying conceptual differences in the different models of democracy. For instance, the WMUA research, which relies on Habermas's thinking about the public sphere, positions community radio as a space separate from state where debate takes place and a consensus is reached (Habermas, 1989). In contrast, the theories of Fraser (1990; 2003) and Mouffe (1999) highlight a need for conflict and discussion often in oppositional public spheres (Bailey *et al.,* 2008). In this case, community radios are 'crucial sites for struggles for hegemony' (Kellner, 1992 in Bailey, *et al.,* 2008: 11). The type of democratic theory - specifically the role of the media therein – does affect normative visions of the community radio space. However, there is a connection to be found in that all models can share focus on citizen participation 'in these processes of dialogue, debate and deliberation' (Bailey, *et al.,* 2008: 11).

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, *et al.,* 2008). The model's four parts are complementary but together they aim to capture the 'specificity and diversity' of community radio (Carpentier, *et al.,* 2001).

The four parts to the model have been elaborated elsewhere (see for example Bailey, *et al.,* 2008; Carpentier, *et al.,* 2001). However, a brief overview is presented below to provide an overview of the salient features relevant to this research.

Ties to the community

Community radio is conceptualised here as being located within a particular community and broadcasting to a particular community. These communities are not just ones geographically located or tied by ethnic origin (Carpentier, *et al.,* 2001). Symbolic communities or communities of meaning are also relevant and the broad notion of community also enables the creation of new communities who form through interactions in a community media space. This part of the model puts *access to* and *participation in* and *through* the media at the forefront of community radio's endeavours.

Community radio as an alternative to the mainstream

In this part of the model, UK community radio would be conceived of as an alternative to BBC/commercial radio. This part introduces a distinction between mainstream/commercial broadcasters and community radio. The distinction offers up the latter as a complement to existing provision, but the distinction is also often conceived of in negative or confrontational terms (Carpentier, *et al.,* 2001). 'Alternative' in this part of the model can include content provision, organisational structure and several other ways that community radio can identify itself as alternative (see Bailey, *et al.,* 2008 for an overview). Participation in alternative media is often the source of the 'alternative' in this definition as 'audiences' themselves decide for themselves the best way of running their station.

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 community radio. It draws on Deleuze and Guattari's (1987) theory of the rhizome, which conceptualises community radio as a 'crossroads' where civil society groups, the state and the market can interact. The advantage of the rhizome as a metaphor for the role of community radio in society, is that it avoids the problem of 'tenure systems', whereby community media outlets become not a place for expanded thought and exposure to the 'other' but rather a space of 'preaching to the converted' (Downing, 2003).

A coherent identity underlying these four-parts is underpinned by political identity theory (Laclau and Mouffe, 1985), which stresses the inherent antagonism in social interactions and their role in constituting identities (Bailey *et al.,* 2008). Political identity theory does not conceive of identities as fully formed, instead they are viewed as fluid and always subject to change. Social antagonisms – or opposition to (an)other's position – therefore do not take place between actors with stable identities. Instead confrontations are constitutive of identity as the "other" becomes a negative point of identification.

By situating this community radio in these four complementary theoretical frameworks, the diversity of community radio can be considered and their potential to democratise the media illustrated. This model has been adopted by, among others, (Bailey, *et al.,* 2008). This research adopts the four-part model to analyse the specific identity components emphasised (or de-emphasised) in the policymaking process.

Access and participation

In addition to providing a platform for ordinary citizens as part of the right to communicate, the democratising potential of community broadcasters emerges from the day-to-day practice of negotiating competing interests. Access refers to 'the availability of opportunities to choose relevant programmes and have a means of feedback' whereas participation 'can thus been seen as a process in which the individual members (of a community) have a certain degree of power to influence or determine the outcome of that process' (Bailey, *et al.*, 2008: 13). Participation can be conceptualised in two ways: Firstly there is participation *in* the media, both in terms of content and in terms of participation in the structure of the station. Secondly, there is participation *through* the media, for example in both public debate and self-representation in public spaces (Bailey, *et al.*, 2008). Through the difficulties that come with negotiating the competing interests of groups, community media organisations 'become over the years very knowledgeable in the actual organisation of democracy' (Carpentier and Scifo, 2009). Thus, democratising potential of community media is arguably contingent on the level of access and participation such media provide ordinary citizens.

Access is also an issue policymakers contend with, but in terms of media policy and regulation, access also has multiple meanings as well as different objectives depending who the access is for. For example, access for citizens or for consumers are considered different objectives (Tambini, 2006). Moreover, these concepts and their relation to theories of community media are further complicated by the rise of the Internet as a communications medium. This lead some scholars to argue that lack of access would become less problematic. In the 1980s and 90s, an increasing number of media outlets along with the decreased distinctions between telecoms and broadcasting spurred arguments about the liberalisation of broadcasting policy (van Cuilenburg and McQuail, 2003). This 'era of technological convergence' arguably ushered in a new phase of communications policy based on the logic of the market where access is seen as less of a problem (van Cuilenburg and McQuail, 2003).

But even considering the increased access afforded by the Internet, certain inequalities of access may remain. Tambini (2006) suggests that different types of access are necessary components in developing citizenship competencies and media literacy. This argument, rather than positioning broadcasting intervention as problematic in a digital age, contends that some intervention in broadcasting may continue to be necessary in order to correct for

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.

UK access radio?

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. CONCEPTUAL FRAMEWORK

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 participation. Key concepts in community radio theory (Bailey, *et al.,* 2008), these notions have also played an increasingly important role in media policymaking discussions (Freedman, 2008). The variety of ways the concept of access can be employed in media policy (Tambini, 2006) provided a basis for examination of where this placed community radio in terms of its role in the broader media system as discussed by respondents.

Whilst parts of this conceptual framework are drawn from various disciplines, each concept in this framework draws on the idea of Foucault and Habermas as well as Wittgenstein. Following Parsons classifications of analytical frameworks (1995), the approach above arguably can be located in the political/policy process framework offering explanations of the political context of policymaking, specifically the 'policy discourse approaches' and it explains the process in terms of language, communication (Parsons, 1995) and the role of communication in replicating structure and setting a framework for agency.

The goal of this research is to analyse the policymaking process in the UK for community radio. It will attempt to, examine which identity components were stressed for the sector; use the concepts of frames to explore how choices during policy discussion can be obscured by lines of argumentation; and it will look at how conclusions reached amounted to claims about the way things ought to be (Majone, 1989). It will see if and how the range of identity components available to UK community radio narrowed during the policymaking process. It will pay particular attention to the discussion of policy objectives around the discussions of the Community Radio Order. In particular, it will examine changes in these frames, as well as how these changes contributed to the policy's stated objectives. Finally, it examines selected outcomes from the policy to determine if they match the intention of the Order's authors and how this compares with the ethos of community radio. This dissertation may provide insight on policymaking for future community media related affairs.

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4. RESEARCH QUESTIONS AND RESEARCH DESIGN

RQ1: In what ways, if at all, was the identity of community radio framed during the policymaking process?

RQ2: In what ways, if at all, are the stated intentions of community radio policy reflected in the outcomes?

The two research questions called for a four-stage approach using three methods. To answer the first research question, documents created during the policymaking process were examined to construct an historical 'map' of the issue as well as to identify who was involved. Interviews were used to gain further insight into the arguments that supported different ways of positioning the community radio issue. Next data from both the documents and interviews were examined and the arguments made were identified so they could be grouped into frames based on how community radio was positioned. This followed a methodological approach taken by Hoffman (1995).

To answer the second question, data from the interviews and documents on the intended outcomes of the community radio policy were measured using content analysis. Key commitments documents were used to determine what kinds of stations were currently broadcasting in this tier of radio. These issues were used as a measure of the outcomes as they represent information presented to Ofcom with the intention of fulfilling the objectives the Order was intended to achieve. The focus of this content analysis was on access/participation and particular categories under the social gain heading. These were issues identified from results from the investigation of the first question.

Support for chosen approach

Generating data from documents is well suited to investigating phenomenon that is temporally distant (Johnson and Joslyn, 1991) such as the community radio policy process. The strengths of document analysis are cost, ease of accessibility and the length of time that the information covers. Possible weaknesses of this approach include getting access to the data, acquiring an accurate description of record keeping practices and having confidence in the data collection process. These are less of a concern when looking at government

records that tend to be well archived (Johnson and Joslyn, 1991). However, documents do not contain complete information – and the type of information they do contain is related to their intended purpose and the accuracy, honesty and ability of the person who prepared them (Scott, 1990; Nord, 2003).

It is possible that gathering data only from documents would not reveal the meaning behind the story. Therefore, in-depth interviews with those involved were employed as a complementary method of data collection. In-depth interviews are suited to research problems that requires a descriptive and explanatory rather than a predictive approach (Hakim, 2000; Deacon, *et al.*,, 2007). This method has an advantage over surveys as they enables the interviewer to examine meaning (Hakim, 2000; Deacon *et al.*, 2007).

Content analysis and coding allowed a directive approach to investigate whether the specific stated policy objectives were reflected by licencees considered as a whole (Krippendorff, 2004). The directive nature of content analysis was well suited to the 'big picture' that this research question called for (Deacon *et al.*, 2007). Large amount of data gathered by Ofcom's standardized was summarised into short descriptions. These are what Bauer refers to as 'knowledge maps' (Bauer, 2007). Furthermore, as content analysis is more concerned with directed summary rather than meaning, it provided a complement to the in-depth interviews in addressing the second research question.

Documents created during the policy process: particular methods & procedures

Sampling

The main sources of documents assessed for this research included position papers, parliamentary speeches, sub-committees note, ministerial speeches, white papers and consultation documents (Johnson and Joslyn, 1991). In order to trace all the documents relating to the community radio policy process I used the websites of the Houses of Parliament, Radio Authority archive, and Ofcom. Where information was unavailable I contacted the parties and asked for the required documents.

Even though the government documents were not going to be analysed quantitatively, it was still necessary to extract and record data from the documents in a systematic fashion (Scott, 1990). For this reason key questions were asked about each of the documents during analysis and data summarized in a table with conflicting points noted and investigated.

Challenges posed by government issued documents were addressed by Scott's criteria for assessment of quality: authenticity, credibility, representativeness, and meaning (Scott, 2006).

Data informing other methods

From the documents a list of institutions and actors involved with community radio policy issues was compiled to inform the sampling of interviewees. Next, an historical 'map' of the process was constructed. This map identified certain junctures where identity components were emphasised and de-emphasised. These informed the organisation of the interview topic guide.

Data analysis

As it was not necessary to derive any numerical measures a thematic rather than content analysis was appropriate (Johnson and Joslyn, 1991). Thematic analysis involves reading across the interview data to find 'repeated patterns of meaning' (Braun and Clarke, 2006: 86). Themes in the data were identified using a theoretical approach advised in the literature (Braun and Clarke, 2006). Potential lines of argumentation were firstly identified. Then each was considered for how it positioned community radio in the debate and which characteristics were emphasised. Next each of these sets of codes were grouped into unique ways of 'seeing' the community radio issue. Each of these groups of codes formed a theme or *frame*. Next each text extract was read in the context of the document to consider if the frame was applicable. Finally the entire data set was read again to ensure the data comprising each frame was contributing to that frame and not to one of the others. This approach followed the step-by-step guide advised in Braun and Clarke (2007). The same steps were also applied to the interview data.

In-depth interviews: particular methods & procedures

The purpose of the interviews was to explore the respondents' understanding of community radio policy objectives in UK, to see which identity aspects they emphasised during the process; why, and to explore the frames through which these identity components were perceived as advantageous using an examination of meaning.

The concrete questions addressed through collection and analysis of elite interview data were:

- Which identity components were emphasised and de-emphasised in the policy process?
- Why were those components emphasised (as opposed to other ones), how were they emphasised and by whom?
- What compromises were reached to put community radio into practice through policy measures?
- What was the means of accomplishing those objectives?
- Are the identity components emphasised in the policy measures reflected in the outcomes?

Sampling

A mix of policy actors representing a range of institutions and perspectives was of paramount concern in selecting respondents, and these were identified from the document analysis. Pilot interviews with two regulators with whom an introduction was already procured provided a starting point to identifying advocates in the informal stages of negotiation. The first group was then able to facilitate contact with other actors making further recommendations on my behalf. This 'snowball' sampling strategy – where one respondent leads to recommending another – is invaluable for elite interviews but does not provide a representative sample (Deacon *et al.,* 2007). However, this 'snowballing' is recommended by Yanow in Fischer (2003) for interpretive frame analysis. Actors on different sides of the policymaking process were approached to avoid an unbalanced perspective, although it proved difficult to secure interviews with people who were opposed to the introduction of community radio although an interview was secured with a commercial radio advocate who currently works on such issues.

Design of research tools: the topic guide

A set of standard questions was posed to each of the respondents (although phrased differently in the pilot interviews). In addition, there were a couple of additional questions specific to each respondent. One interviewee could only spare a limited amount of time and only the specific questions were posed in this instance.

The interview built on a thorough examination of documents, a consideration of the identity components emphasised, and potential themes they may contain. Additionally during the

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 more feedback and thus be more accurate (Shuy, 2003). However, there is conflicting evidence on the superiority of face-to-face interviews as respondent may speak with more candour over the phone (Jackle, *et al.*, 2006). The interviewees along with the times and locations of the interview are listed in Table 1 below:

Table 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 to minimise the latter the interviews were recorded on a digital recorder and later transcribed for accuracy. All respondents were informed that the research interest was community radio policy and each one was told why I was specifically interested in speaking with them during the initial contact phase. Additionally consent forms were given to all respondents prior to the interview. The consent form stated an overview of the research, the option for the respondent to request to remain anonymous and the offer for the respondent to review a copy of their transcript and receive a copy of the final research.

Following a period of reflection where codes and ideas were noted, a thematic analysis commenced. The procedure followed the same steps as for the documents.

Content Analysis and Coding: particular methods & procedures

Sampling

Since the literature already contains many examples of in-depth case study work on community radio, this research opted for the breadth that content analysis could provide. Forty-six community radio stations' 'key commitments' documents were coded for the levels of participation and access they proposed to offer the communities they were serving. All documents were downloaded from Ofcom's website where they are publicly available[9]. These

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[8] Lawrie Hallet and Susan Williams were interviewed as part of a pilot-study in the framework of a methods assignment

[9] See URL: http://www.ofcom.org.uk/static/radiolicensing/Community/community-main.html

documents were coded for type of community served and the reason that the community was underserved. All the access pilot stations were selected for coding, along with all the second round licensees currently broadcasting in order to compare between the 'ideal' mix laid out by the Radio Authority and the formats licensees since Jan 2007.

Design of research tools: coding schedule

Following the early research a pilot coding schedule was tested. This showed the need to split up certain variables into a series of more detailed questions in to obtain sufficient information. For example, categories for why they groups were underserved it became necessary to separate the type of groups and reason for being underserved on the coding schedule. However, these results were recombined as the final variable:

1. Representation (minority groups w/no mainstream representation)
2. Local news (broad geographic community and with mainstream music)
3. Arts/culture (provision of alternative content)
4. Access to broadcasting (emphasis on access for being underserved.)

Pearson's chi-squared test to determine if there were dependencies between a number of variables and when a station was licensed.

Analysis & Inter-coder reliability

Potential sources of unreliability were assessed with inter-coder reliability measures - 'the coding agreement between independent coders' (Allen *et al.,* 1997: 93). Two independent coders were trained for one hour and each coded 20% of the sample weighted between the pilot and second round stations (n = 10). The percentage agreement for each code was calculated (see appendix 4). The overall intercoder-reliability (r = agree / (agree + disagree) was above 80% for all variables. Reliability higher than 80% is considered indicative of a well-defined coding frame that stands the test of replication (Krippendorff, 2004). The figures used in the analysis were the researcher's in the case of disagreement, although all points of disagreement were reconsidered and discussed.

Ideal strategy?

Given unlimited time, a detailed breakdown of the 'key commitments' document, analysis of the full number of stations broadcasting, and a thorough discursive analysis (DA) approach to the interview data would have been ideal.

5. RESULTS AND INTERPRETATION

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.

Policy Frames and Identity Components

Five frames were identified from the data and each is analysed in detail below. Quotes are used to illustrate the analysis reported. Each quote is representative of the theme (frame), or sub-theme (argument), it is quoted under. Sub themes are discussed when they conflict or when they raise interesting issues such as potential reasons for the on-going funding disputes between the community radio sector and Government (Buckley, 2009).

Frame 1: 're-inventing radio'

'Radio solutions to radio problems'[11]

Intro to frame: positioning/problem/uniqueness
This frame positioned community radio as an exciting new development - a way for people to decide what they--and their communities--wanted from a radio station and the means to provide it. The common element to these arguments was that community radio was positioned as a solution to radio problems. There were lots of arguments addressing the sub-problems that this frame addressed which made it persuasive. These were:
- Commercial stations had moved away from localness
- Access / the right to communicate
- Two-way communication / rise of the Internet
- Radio had become too safe / lack of creativity
- PSB monopoly: CR a way to have plurality of PSB providers?

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[10] Details of community radio stations' license approval date and broadcasting status were obtained from http://ofcom.org.uk. These were current May 2009.
[11] Tony Stoller speech to IPPR

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 – a key concept in community radio theory was seen as central: 'we chose the term "Access Radio" because it emphasised the broadening of access to the right to broadcast at a time when ownership consolidation was continuing'[13]. At this early stage (in accordance with the ethos of this type of radio) access was seen as a key objective of the new tier of radio.

The idea that civil society organisations had something to contribute in this form of media is the origin of social gain and a central idea in this frame. Social gain was, according to Tony Stoller, a term 'borrowed' from the regeneration literature, which Government was keen on at the time. The phrase served at least two purposes. Firstly as a way to distinguish community radio from other broadcast offerings and secondly as an offering for use of broadcast spectrum, '[t]his was the deal: 'Give us a spectrum and we will give you things that will make your society better.' And social gain was the short hand.'[14] In this frame then the use of 'social gain' is seen as a means to an end, that of getting community radio approved, but it also demonstrates that community radio was seen to play a role working with civil society and third sector organisations.

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[12] Interview with Richard Hooper, July 2009

[13] Interview with Tony Stoller, July 2009

[14] Interview with Tony Stoller, July 2009

Finally of note is the set arguments based on the premise that radio had become too 'safe': 'the common impulse that the pilot access stations gathered round was an impulse to broaden--consciously or not--the meaning and identity of radio in Great Britain'[15]. This argument prioritised the identity of the new sector as 'a tad dangerous' providing a (much needed) challenge to the existing broadcasters – including the BBC[16]. This highlighted the 'alternative' potential of the new sector but it also opens up an area of challenge or - sphere of conflict (Fischer, 2003).

Frame 2: 'threat'

'Competition for audience is competition for revenue'

Intro to frame: positioning/problem/uniqueness

The argument contributing to this frame was generally comprised of the following claims:

- what is the point in having community radio? No one will listen.
- there is no problem to address with community radio because, if there were, the demand would be taken care of by the market.

The literature suggests two main reasons for the failure of these arguments to prevent the inception of UK community radio. Firstly, they contained internal contradictions and secondly the term 'evidence of demand' was perceived differently by arguments in the first frame.

One contradiction was that the arguments driving the liberalisation of spectrum was the idea that convergence makes it harder to justify intervention in broadcasting on the basis of plurality because content is available elsewhere. Commercial radio operators used this as an opportunity to consolidate (Freedman, 2008) and in doing so they moved away from local content provision. However, the government still considered certain things as non-substitutable goods – goods where the Internet could not provide in the same way as local radio could – especially with regards to provision of information on local services and news (Murroni *et al.*, 1988).

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[15] Interview with Edmund Baxter, July 2009
[16] Interview with Tony Stoller, July 2009

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 arguments were being made that because of media fragmentation, revenue-driven broadcasting could not-sustain small scale local radio. These arguments were being used to justify consolidation by commercial broadcasters. Though they did not contradict with their first claim, they contradicted the Governments belief that there were some things – like local news that should be provided for outside the market. The literature suggests that in order to be taken seriously, arguments need to be persuasive (Majone, 1989) and these contradictions detract from the effectiveness of this frame.   Therefore this frame may actually have helped accelerate the opening for local *community* radio instead.

Frame 3: 'threat-incorporate'

'[C]ommunity stations and smaller scale commercial stations do have quite a similar output and if they are going to be put together in an ultra local tier there is obviously some similarities in their output.'[18]

Intro to frame: positioning/problem/uniqueness
In this frame community radio's very presence posed a threat to commercial radio's identity – not just their profit making abilities. At the crux of both the 'threat frame' and the 'threat-incorporate frame' is the core belief that market efficiency best fulfils public interest in broadcasting. 'Threat-incorporate' is different because it stops maintaining that media *has* to be about audience maximisation but still maintaining that it *ought* to be. These arguments link two main claims: (1) community radio and commercial radio are similar in sound the only difference is purpose and (2) commercial radio is already fulfilling demand and can fulfil all demand through market mechanism.   This leads to a further claim that, because commercial radio can fulfil all demands, and, because community radio and commercial radio are similar, any further intervention is not to do with media.   While this doesn't totally remove the position of community radio as a threat to commercial radio, it does

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[17] Phil Riley, Chief Executive, Chrysalis Radio at Access Radio Seminar, February 2001
[18] Interview with Alice Dickerson, August 2009

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] - the wider media policymaking context was using the language of (neo)liberalism.   The literature suggests that the difference between the institutional norms and the wider political environment placed structural limitations on the actors themselves as well as the discourses used in the process of policy argumentation and persuasion (Majone, 1989).   To put it plainly, to communicate effectively you must first 'speak the language'.

In this frame the language is centred around 'social gain' however three distinct arguments emerged that contribute to this frame.   The arguments each come from very different places and see social gain quite differently, but they all contribute to a position for community radio

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[19] Interview with Tony Stoller, July 2009

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

There was clearly some strategic positioning of community radio in this frame in order to 'sell it' to the relevant people. 'that was pretty pragmatic; we knew there wouldn't be much money around. We were told by Government at the time, [by what was then the Department of the Environment/Department of communities and local government] that we could get at the regeneration funds'[20]. While this frame did positioned community radio having a legitimate claim on public funds for communication purposes, here the focus was on other sources of government money.

Argument 3: marginalized

Of particular interest is the presence of commercial radio voices whose arguments were for the support of community radio but *against* the Radio Authorities claims: "the radio regulator believes that it always knows best and nannies independent radio from the cradle of creativity to the graveyard of the bland"[21].

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

The four-part model is not discussed for this frame because within it community radio as positioned by this frame did not obscure or emphasise any identity. In fact, around the meaning of social gain community radio could be almost anything to everyone. While this may have been a pragmatic decision, Fairclough's (1992, in Fischer, 2003) work on the adoption of economic language in non-economic commodity producing domains suggests that this is a tactic which can appear to smooth the way between conflicting meanings. For

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[20] Interview with Tony Stoller, July 2009

[21] Ralph Bernard, Chief Executive, GWR Group at Access Radio Seminar, February 2001

example, he examines how the concept of 'skills' has been used to mediate the tension between the student learning to broaden their horizons and learn about the world in which they live has been joined by the vision of the student as a jobseeker. This says Fairclough narrows the aims of education and creates the situation where 'skills' become seen as the essence of education conflating the different positions on the role and aims of education (Fairclough, 1992 in Fischer, 2003, p. 91). Arguably social gain performs a similar role in community radio allowing one group to see it as the benefit to be provided through radio and another as a way to 'tie down' some deliverables.

Frame 5: 'delivering social gain'

'Since when is the media about social gain?'[22]

Intro to frame: positioning/problem/uniqueness
In the 'delivering social gain frame' community radio is positioned as a community resource rather than a radio station in its own right. This might sounds strange considering that it <u>is</u> a communications medium, but as the arguments contributing to the 'delivering social gain frame' are analysed and discussed below it should become clear that de-prioritising this, community radio is positioned quite differently.

Starting out as a phrase (strategically) selected to promote the new sector to government and to distinguish community radio from other media offerings, there were contestations about how 'social gain' was to be defined in the Order, '[t]hat was a long painful process I remember - conceptually I don't think in any broadcasting legislation will you find any definition of social gain anywhere else'[23].

The contestations over the meaning of social gain left the definition resting on measurable quantities, and for some the problem became social (and unrelated to existing media practices). 'I think from a government's perspective we've always seen it more as a social inclusion tool than we have a as a broadcasting tool'.[24] This arguably contributed to a

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[22] Interview with Phil Korbel, July 2009

[23] Interview with John Mottram, July 2009

[24] Interview with John Mottam, July 2009

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:*
>
> *a) the provision of sound broadcasting services to individuals who are otherwise underserved by such services*
>
> *b) the facilitation of discussion and expression of opinion*
>
> *c) the provision (whether by means of programmes included in the service or otherwise) of education or training to individuals not employed by the person providing the service*
>
> *d) the better understanding of the particular community and the strengthening of links within it [25]*

The legal definition became more instrumental – or focused on community radio as a tool to deliver these benefits - rather than intrinsic – arising from the medium of communications itself. The difference, whilst subtle, is an important one.

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

By positioning community radio as a delivery mechanism for 'social gain' some of the hoped-for social gain to be had through broadcasting was lost. For example, by reducing community radio to an 'ordinary' civil society organisation, rather than civil society media, the benefits of self-expression were de-emphasised in favour of measurable 'deliverables' such as education and the provision of broadcasting to the excluded (Bailey, *et al.*, 2008). The implications of this re-positioning is a threat to community radio's ability to make valid claims on public funds for communication, as well as to potential sources of revenue such as regeneration funds[26].

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[25] From The 2004 Community Radio Order

[26] Interview with civil servant, July 2009

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.,* 2008).

Conclusion: re-framing the problem

In this way the position of community radio in 'delivering social gain' is similar to 'radio with a social purpose' except that, in the former, the ambiguous meaning of the term 'social gain', serve an important political functions by providing a vague term that everyone could gather around. 'Seeking to satisfy different interest groups at the same time, government policies often comprise a sequence of ambiguous claims and actions that contain logical inconsistencies' (Fischer, 2003; 62). In this way ambiguity *helps* reach political compromise by bringing together disagreeing groups by hiding problematic implications.

> **RQ1: In what ways, if at all, was the identity of community radio framed during the policymaking process?**

From a broad starting point, the frame through which community radio was positioned narrowed during the policymaking process and conflicting frames, arguably, lead to a political compromise where community radio role was re-framed as delivering social gain.

Stated Intentions and Policy Outcomes

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

Results and Discussion of the Content Analysis

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
- Station output
- Reason why community is underserved

Specific opportunities for anyone to make radio?

While the Chi-square test indicates evidence that the chance to make radio at a community station is associated with its licensing status ($P<0.05$), this test cannot be considered reliable as the sample size in one cell of the cross-tab does not satisfy the conditions to assume a chi-squared distribution.   Looking at the cross-tab (Table 2) the difference in proportions where someone is named as being able to produce a radio programme is 28.8% higher in pilot station than second round stations.

Table 2: Stated opportunities for participation in radio programme making

V8 MakingRadio * V1 RoundApproved Crosstabulation

			RoundApproved		
			Access Pilot Station	Second Round Station	Total
MakingRadio	No–one named	Count	1	11	12
		% within RoundApproved	6.7%	35.5%	26.1%
	Station vols / members / anyone	Count	14	20	34
		% within RoundApproved	93.3%	64.5%	73.9%
Total		Count	15	31	46
		% within RoundApproved	100.0%	100.0%	100.0%

While this result reflects only what was stated on the key commitments and therefore is not a reflection of what the stations are doing in practice it does suggest that the view of 'access and participation' taken by those approving licences is different from how it is perceived in community radio theory where ideally interaction

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.

Table 3: Comparison of stated intentions for participation in station management

V7 ParticipationMgmt * V1 RoundApproved Crosstabulation

			Access Pilot Station	Second Round Station	Total
ParticipationMgmt	None/selected by board	Count	4	12	16
		% within RoundApproved	26.7%	38.7%	34.8%
	Open-door / all make decisions	Count	3	8	11
		% within RoundApproved	20.0%	25.8%	23.9%
	Some vols/membs (invited)	Count	5	4	9
		% within RoundApproved	33.3%	12.9%	19.6%
	Any vols/membs (via election)	Count	3	7	10
		% within RoundApproved	20.0%	22.6%	21.7%
Total		Count	15	31	46
		% within RoundApproved	100.0%	100.0%	100.0%

Table 4: Comparison of planned music output

V5 MusicOutputMain * V1 RoundApproved Crosstabulation

			Access Pilot Station	Second Round Station	Total
MusicOutputMain	Mainstream (predom) / Mainstream (spec)	Count	6	24	30
		% within RoundApproved	40.0%	77.4%	65.2%
	All Niche (predom) / at least some niche (spec)	Count	9	7	16
		% within RoundApproved	60.0%	22.6%	34.8%
Total		Count	15	31	46
		% within RoundApproved	100.0%	100.0%	100.0%

Table 5: Comparison of ways applicants' will serve an underserved community

V6 Underserved * V1 LicensingRound Crosstabulation

			Access Pilot Station	Second Round Station	Total
Underserved	Non-English Language	Count	5	3	8
		% within LicensingRound	33.3%	9.7%	17.4%
	Local news/traffic/weather	Count	1	15	16
		% within LicensingRound	6.7%	48.4%	34.8%
	Arts / culture	Count	1	2	3
		% within LicensingRound	6.7%	6.5%	6.5%
	Religious / military / age specific	Count	4	5	9
		% within LicensingRound	26.7%	16.1%	19.6%
	Disadvantaged	Count	3	3	6
		% within LicensingRound	20.0%	9.7%	13.0%
	Access	Count	1	3	4
		% within LicensingRound	6.7%	9.7%	8.7%
Total		Count	15	31	46
		% within LicensingRound	100.0%	100.0%	100.0%

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.

> **RQ2: In what ways, if at all, are the stated intentions of community radio policy reflected in the outcomes?**

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. CONCLUSION

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 which the sector could form a coherent identity. This result complicated the sector's claim to funding. Moreover the explicit social-rather than media-purpose moved the new sector away from some of the ideals set out in community radio theory, in particular the realisation of community radio as an alternative (in content and/or organisational structure) to state and market broadcasters which suppressed chances the sector could receive money for public service content. The implication of de-emphasising this component is that now commercial radio interests can emphasise similarities between small commercial and community stations, which could threaten the long terms survival of a distinctive 'third tier'.

An examination of arguments put forward during the process revealed five distinct policy frames. In 2000 the dominant frame was 're-inventing radio' which comprised several complementary arguments. However, the research also evidenced other frames at this stage, notably, the 'threat' of community radio to commercial radio operators. When advancing positions to Government, the arguments put forward emphasised particular identity components for the new sector. These were that community radio would be complementary rather than competitive with commercial stations and that community radio would be focused on achieving social policy objectives. By 2004 the community radio issue had been strategically re-framed with the benefit of community radio being only tentatively related to its function as a communications medium. This frame, referred to here as 'delivering social gain', partially incorporated the concerns of competing viewpoints to the policy debate. It guided policy implementation, though it did not resolve underlying differences such as those currently exemplified by the ongoing funding dispute.

The lens of community radio theory was employed to critically consider the implications of the 'delivering social gain' frame. The four-part model suggests there is no <u>one</u> ideal form for a community radio sector to take - stations should able to adopt a variety of forms within broad constraints within the ethos of community radio. Interviewees responses suggest that 'let a thousand flowers bloom' was indeed the intention, but in practice certain types of community radio stations are less likely to come into being, for example, stations wishing to create interpretive communities and stations wishing to take alternative organisational structures or provide alternative content.

The eventual licensing criteria applied by Ofcom is guided by the 2004 Order, and it includes the rather ambiguously worded social gain criteria. This ambiguity allows a certain amount of flexibility when dealing with stations not clearly meeting the criteria. On one hand, this has enabled groups wishing to operate within in the spirit of community radio but not clearly meeting the criteria to get licences. On the other hand this flexibility has also had an unintended consequence: the approval of commercial stations 'by the back door'.

To investigate the sector as a whole, employing content analysis and coding proved valuable. The comparison of pilot stations and second round licensees suggest that the most recent community radio stations are less likely to emphasise access to and participation in radio and when considered as a whole provide less diversity of output than did the pilot stations. This suggests that further insights might be gained from analysing the whole

community radio sector rather than focussing on non-representative case studies. After all, it was the breadth of the content analysis that showed 48.4% of stations licensed since January 2007 relied predominantly on local news, travel and weather as their community radio offering. This suggests that these more recently licensed community radio stations might be similar to local commercial radio stations. Arguably then the 'delivering social gain' frame steered the policy away from the ideal of participatory radio with objectives that failed to create a wholly distinctive third tier of radio. This implies a need for vigilance to ensure the sector develops as intended.

Further research

A comparative investigation of failed applications against successful ones may reveal further insights into the effectiveness of the tools used to licence and regulate community radio stations to the ideals set out by community radio theory.

The limited scope of this dissertation did not investigate the influence of policymaking and governance at the EU level. An investigation at the supranational level could provide further insight into the particularities of the UK sector and allow for comparison with community radio in other European countries.

REFERENCES

Allen, J. Livingstone, S. and Reiner, R. (1997). The Changing Generic Location of Crime in Fims: A Content Analysis of Film Synopses, 1945-1991. *Journal of Communication* 47(4): 89-100.

Artz, L. and Yahya, R. (2003). *The Globalization of Corporate Media Hegemony*. Albany: State University of New York Press.

Bailey, O. G., Cammaerts, B. and Carpentier, N. (2008). *Understanding Alternative Media.* Maidenhead: Open University Press/McGraw-Hill.

Barlow, W. (1988). Community Radio in the US: the struggle for a democratic medium. *Media, Culture & Society* 10(81): 81-105.

Bauer, M. and Gaskell, G. (2007). *Qualitative Researching With Text, Image and Sound: A Practical Handbook.* London: Sage.

Birkland, T. A. (2005). *An Introduction to the Policy Process: Theories, Concepts, and Models of Public Policy Making.* London: M. E. Sharpe.

Braun, V. and Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology* 3: 77-101.

Buckley, S. (2009). Community Radio in Funding Crisis. *The Guardian,* August 24.

Cammaerts, B. and Carpentier, N. (Eds.). (2007). *Reclaiming the Media: Communication Rights and Democratic Media Roles.* Bristol, UK: Intellect.

Carpentier, N. and Scifo, S. (2009). Introduction: Community media's long march. *Telematics and Informatics* 27(2): 115-18.

Carpentier, N., Lie, R. and Servaes, J. (2001). Community media - Muting the democratic media discourse? *Social theory and discourse* (pp. 1-24). Brighton: Centre for Critical Studies in Communication and Culture: The international Social Theory Consortium.

Carragee, K. and Roefs, W. (2004) The Neglect of Power in Recent Framing Research. *The Journal of Communication* 54(2): 214-233.

Coyer, K., Dowmunt, T., and Fountain, A. (2007). *The Alternative Media Handbook.* London: Routledge.

Daviter, F. (2007). Policy Framing in the European Union. *Journal of European Public Policy* 14(4): 654-65.

Deleuze, G. and Guattari, F. (1987) *A Thousand Plateaus. Capitalism and Schizophrenia*, Minneapolis. MN: University of Minnesota Press.

DCMS (Department of Culture Media and Sport) (2004). *The Community Radio Order 2004.* London: TSO. See URL: http://www.opsi.gov.uk/si/si2004/20041944.htm (Last accessed 20 April 2010)

DCMS/DTI (Department of Culture Media and Sport/Department for Trade and Industry) (2003). *The Communications Act.* London: TSO. See URL: http://www.opsi.gov.uk/ACTS/acts2003/ukpga_20030021_en_1 (Last accessed 20 April 2010)

Deacon, D., Pickering, M., Golding, P. and Murdock, G. (2007). *Researching Communications: A Practical Guide to Methods in Media and Cultural Analysis.* London: Hodder Arnold.

Downing, J. D. (2003). Audiences and readers of alternative media: the absent lure of the virtually unknown. *Media, Culture & Society* 25(3): 625-45.

Entman, R. (1993) Framing: Towards clarification of a fractured paradigm, *Journal of Communication* 43: 51-58.

Everitt, A. (2003a). *New Voices: An Evaluation of 15 Access Radio Projects.* London: Radio Authority.

Everitt, A. (2003b). *New Voices: an update on the Access Radio Projects.* London: Radio Authority.

Fischer, F. (2007). Deliberative Policy Analysis as Practical Reason: Integrating Empirical and Normative Arguments. In F. Fischer, G. J. Miller, and S. M. Sidney (Eds.) *Handbook of Public Policy Analysis: Theory, Politics, and Methods* (pp. 223-236). London: CRC Press.

Fischer, F. (2003). *Reframing Public Policy.* Oxford: Oxford University Press.

Fraser, N. (1992). Rethinking the Public Sphere: a contribution to the critique of actually existing democracy. In C. Calhoun (Ed.), *Habermas and the Public Sphere* (pp. 109-42). Boston: MIT Press.

Fraser, N. (2003). Transnationalizing the public sphere. . *Paper presented at the Conference on Identities, affiliations and allegiances, .* 3-4 October: Yale University, Department Of Political Science.

Freedman, D. (2008). *The Politics of Media Policy.* Cambridge: Polity.

Freire, P. (1970). *Pedagogy of the Oppressed.* London: Penguin Books.

Gamson, W. (1992) *Talking Politics*. New York: Cambridge University Press.

Gaskell, G. (2000). Individual and group interviewing. In M. W. Bauer, and G. Gaskell (Eds.) *Qualitative researching: with text, image and sound. A Practical Handbook* (pp. 38-56). London: Sage Publications.

Gaskell, G., and Bauer, M. W. (2000). Towards Public Accountability: beyond sampling, reliability and validity. In M. W. Bauer (Ed.) *Qualitative researching: with text, image and sound. A Practical Handbook* (pp. 336-50). London: Sage Publications.

Giddens, A. (1984). *The Constitution of Society.* Cambridge: Polity.

Gramsci, A. (1971 [1988]) (translated by Quentin Hoare and Jeoffrey Nowell-Smith) Selections from the Prison Notebooks. In David Forgacs (Ed.) *A Gramsci Reader*, London: Lawrence and Wishart.

Gusfield, J. R. (1981). Social Movements and Social Change: Perspectives of Linearity and Fluidity. In L. Kriesberg (Ed.) *Research in Social Movements, Conflict and Change* (pp. 317-39). Greenwich, CT: JAI Press.

Habermas, J. (1989 [1962]). *The Structural Transformation of the Public Sphere.* Cambridge: Polity.

Hajer, M. A. (2005). Setting the Stage: A Dramaturgy of Policy Deliberation. *Administration and Society* 36: 614-47.

Hakim, C. (2000). *Research Design.* London: Allen and Unwin.

Hill, M. (1997). *The Policy Process: A Reader.* Upper Saddle River, New Jersey, USA: Prentice Hall.

Hoffman, J. (1995). Implicit theories in policy discourse: An inquiry into the interpretations of reality in German technology policy. *Policy Sciences* 28: 127-48.

Jackle, A., Roberts, C. and Lynn, P. (2006). Telephone versus Face-to-Face Interviewing: Mode Effects on Data Quality and Likely Causes. Report on Phase II of the ESS-Gallup Mixed Mode Methodology Project, *ISER Working Paper*, 2006-41, Institute for Social and Economic Research.

Jankowski, N. W. and Prehn, O. (Eds.) (2002). *Community Media in the Information Age.* Cresskill, New Jersey, USA: Hampton Press, Inc.

Johnson, J. B. and Joslyn, R. A. (1991). Document Analysis: Using the Written Record. In J. B. Johnson, and R. A. Joslyn, *Political Science Research Methods* (pp. 205-236). Washington, D.C., USA: CQ Press.

Krippendorff, K. (2004). *Content Analysis: An Introduction to its Methodology*. London: Sage.

Kvale, S. (1996). *InterViews: An Introduction to Qualitative Research Interviewing.* London: Sage Publications.

Laclau, E. and Mouffe, C. (1985). *Hegemony and Socialist Strategy: Towards a Radical Democratic Politics.* London: Verso.

Lewis, P. (2008). Finding and Funding Voices: the London experience. *Information, Society and Justice* 2(1): 5-20.

Lewis, P. M. (2006). Community Media: Giving "a Voice to the Voiceless". In P. M. Lewis, and S. Jones (Eds.) *From the Margins to the Cutting Edge: Community Media and Empowerment* (pp. 13-39). Cresskill, NJ, USA: Hampton Press Inc.

Lewis, P. M. (2002). Radio Theory and Community Radio. In N. W. Jankowski (Ed.), *Community Media in the Information Age* (pp. 47-61). Cresskill, New Jersey, USA: Hampton Press, Inc.

Lewis, P. (1993). Alternative Media: Linking Global and Local. *(No. 107)* . (P. Lewis, Ed.) Paris: UNESCO.

Lilleker, D. G. (2006). *Key Concepts in Political Communication.* London: Sage.

Livingstone, S., Lunt, P., and Miller, L. (2007). Citizens and consumers: discursive debates during and after the Communications Act 2003. *Media, Culture & Society* 29(4): 613-38.

Majone, G. (1989). *Evidence, Argument, & Persuasion in the Policy Process.* London: Yale University Press.

Mouffe, C. (1999). Deliberative Democracy or Agnositic Pluralism? *Social Research* 66(3): 746-58.

Mukherjee, R. (2000). "Now You See It, Now You Don't": Naming Privacy, Framing Policy. *Critical Studies in Media Communications* 17(4): 469-42.

Murroni, C., Irvine, N. and King, R. (1998). Tuning into the public interest in radio. *Cultural Trends* 8(30): 35-67.

Nord, D. P. (2003). The Practice of Historical Research. In G. H. Stempel III, D. H. Weaver, and G. C. Wilhoit (Eds.), *Mass Communication Research and Theory* (pp. 362-385). London: AB Longman.

Ofcom (2009). *Community Radio: Annual Report on the Sector.* See URL: http://www.ofcom.org.uk/radio/ifi/rbl/commun_radio/cr_annualrpt/ (Last accessed 20 April 2010)

Ofcom (2004). *Licensing Community Radio .* See URL: http://www.ofcom.org.uk/radio/ifi/rbl/commun_radio/prsandl/l_cr_state/ (Last accessed 20 April 2010)

Parsons, W (1995). *Public Policy.* Cheltenham: Edward Elgar.

Radio Authority (2000). *Radio Regulation for the 21st Century.* See URL: www.ofcom.org.uk/static/archive/rau/publications-archive/adobe-pdf/comminications-bill/Radio%2520Regulation%2520for%252021st%2520Century.pdf+Radio+Regulation+for+the+21st+Century&cd=1&hl=en&ct=clnk&gl=uk&client=firefox-a (Last accessed 20 April 2010)

Radio Authority (2001). *Access Radio Seminar: report from the seminar debating ideas about a possible new third tier of radio services in response to the Communications White Paper.* See URL: www.ofcom.org.uk/static/archive/rau/publications-archive/adobe-pdf/comminications-bill/AccessRadioSeminar.pdf+"access+radio+seminar"&hl=en&gl=uk (Last accessed 20 April 2010)

Rennie, E. (2006). *Community Media: a global introduction.* Oxford: Rowman and Littlefield Publishers.

Schattschneider, E. E. (1957). Intensity, Visibility, Direction and Scope. *The American Political Science Review* 51(4): 933-42.

Scifo, S. (2008). Contemporary Tensions in UK Community Radio Practices. *ECREA 2008 Conference Paper.* Barcelona, Spain.

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-Interpretive Methods in Policy Research. In *Handbook of Public Policy Analysis: Theory, Politics, and Methods* (pp. 405-15). London: CRC Press.