

**THE STATE AND FATE OF
COMMUNITY MEDIA:
PROSPECTS FOR ENHANCING MEDIA
DIVERSITY**

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EXECUTIVE SUMMARY

In November 2010, the Minister of Communications at the time, Mr. Roy Padayachie, withdrew the 2009 Draft Public Service Broadcasting Bill (PSB Bill) in favour of an extensive Ministerial Policy review.

This announcement was welcomed by civil society; and in particular organisations like “SOS: Support Public Broadcasting” Coalition (SOS) that had been campaigning for almost two years for such an overhaul. SOS, in its submission to the Department of Communications, pointed out that the proposed Bill would effectively repeal the existing 1999 Broadcasting Act, given the significant changes to the entire broadcasting landscape it proposed. SOS further pointed out that the White Paper on Broadcasting (developed in the late 1990s) was outdated and did not constitute current government policy on broadcasting.

The on-going, deep-seated structural financial and governance problems facing the SABC; the crises in the local television production sector largely caused by the SABC’s financial and other crises; the continuing question of the sustainability of many community broadcasting stations; and the effects on broadcasting of paradigm-shattering technological changes as a result of convergence of media platforms were cited as further reasons why there was “little option other than for the DoC to embark on a thorough, transparent and inclusive broadcasting policy review process’.

The National Community Radio Forum, SOS and a host of progressive civil society organisations also welcomed the review process as an important opportunity to engage with the thinking about community broadcasting that was emerging from the DoC. The proposed PSB Bill had a number of far-reaching implications for community broadcasters as well and a number of civil society organisations made written submissions to the DoC expressing their reservations at some of the Bill’s proposed provisions and the potential threats these posed to the independence and functioning of community broadcasters. Many of the proposals contained in the PSB Bill raised alarm bells around the independence of community broadcasters being potentially comprised as well as being contrary to the core principles of community broadcasting.

One of the more controversial proposals contained in the PSB was the proposal that municipal officials serve as ex-officio members of community radio boards. The proposed Bill also prescribed a charter for community broadcasters that laid out the size, composition and terms for governance structures. It suggested that the primary role of community broadcasters was to provide information about what Government and municipalities are doing, suggesting a more passive, ‘mouth-piece’ role for community radio and diluting the critical role that this sector could play in facilitating and encouraging vigorous and robust debate on development priorities in their local contexts and taking on municipalities and Government for service delivery failures and corruption where necessary.

Another of the proposals contained in the PSB was for the creation of a centralized Public Service Broadcast Fund to fund broadcasting and to be administered by the MDDA with a mandate to finance a wide-ranging set of functions, including the public service division of the SABC (and the new regional channels and international broadcasting services, content development, community broadcasting, signal distribution and a Broadcast and Signal Distribution Museum).

Progressive civil society welcomed the proposed PSB Fund noting that community media is a public good and should therefore be publically funded. However, it also observed that the DoC had not undertaken the necessary research to establish the amount of money required to adequately fund public broadcasting; nor was it clear whether community broadcasting would have to compete with the SABC, commercial producers/broadcasters and Sentech for resources in the Fund. Questions around the how large the Fund should be; how it should be financed and administered (including criteria outlining who would be eligible to apply for funding) and the independence of the Fund from the Executive arm of Government were also identified as gaps.

The NCRF, in its submission to the DoC, noted that in terms of current legislation governing the MDDA, 60% of the Agency’s fund was ring-fenced for community media and was keen to ensure that any policy changes did not lead to reduced funding to the sector. It also indicated its concern at the lack of economic modeling or research on the projected levels of revenue that would be generated by the proposed 1% tax and that in the absence of such data, there

was a real danger that “the PSB Fund will be insufficient to cover the costs of the public broadcaster, let alone all the other contenders for funding in terms of the proposed Bill.”

The need for an economic model for community radio was also surfaced during deliberations at a Right to Know (R2K) Media Diversity Workshop held in 2011. Questions raised here included the importance of knowing how much money was needed to create a fund for community media that could meet the needs of the sector and the need to establish the core running costs of the 100 plus radio stations, community television, small commercial media and the SABC. The point was made that if there is no accurate quantification of the resources needed, the current situation where key institutions were under-resourced and under-capacitated to deliver on their key mandates would continue.

Seventeen years into our democracy and sixteen years after the first community radio stations were licensed; community radio has seen significant growth. Today, there are over 170 licensed community stations covering a range of geographies, religious and cultural interests and the airwaves are filled with a rich mix of languages including (amongst others) Arabic, Greek, Hindi, Hebrew, Chinese, Nama in addition to the eleven official languages. Community radio listenership is in the region of 8 million listeners – a significant audience and significant growth considering that in 2005 listenership was 3 million¹ people. It has also been an important training ground with many people who now work in public or commercial broadcasting having started off in community radio and it is a significant contributor to the economy – even though it remains largely volunteer-driven.

Despite these tremendous achievements, there is widespread agreement that the community broadcasting sector is still fragile in most parts, beset with a range of internal management, governance, skills, and funding challenges and externally facing quite a hostile environment - particularly, a problematic funding model and broader macro-economic policies.

Community broadcasting also remains amongst the most under-researched and misunderstood development sectors in South Africa. While there are encouraging signs of research interest in community radio as evidenced by a number of recent studies by media students; there are still many key information gaps to enable a more nuanced understanding of the sector. The policy review process was therefore also welcomed as an opportunity to start grappling with some of the information and research gaps that exist.

The research

This research study was originally conceptualised to:

- Provide an indication of the core running costs of a station and relevant line items incurred by community radio
- Establish what community radio stations deliver in terms of quality content and community participation for that money
- Produce various benchmarked models for sustainable community media projects in an urban, peri-urban and rural setting including ‘model’ budgets for various scenarios.
- Present a rationale – including historical and global examples - of state support for sustainable independent community media

However, this was quite an ambitious scope for a small study (of about 10 ten days) with a range of complex elements to consider. Some of the elements were also inadequately conceptualised given the resources available – assessing what stations provide in terms of content cannot be determined from looking at programming schedules; it requires content monitoring analysis. The research was therefore re-conceptualised; taking into account what would be useful for the sector as it starts to engage with the review process; as more of a mapping exercise – a ‘picture’ of the community radio sector in 2012.

While there are many dimensions to sustainability (and the argument has been made that historically there has been an over-emphasis on financial sustainability), this report focused its lens more on financial aspects in order to get closer to understanding what could contribute to a thriving, independent, and robust community-broadcasting sector.

¹ Tleane (2005)

The methodology adopted included:

- A literature review (global & historical);
- Semi-structured interviews with key community media stakeholders and community radio stations; and
- A small survey of media projects to establish running cost,

The research report also drew on a series of workshops and meetings held between 2009 and 2011 with a wide range of stakeholders including the NCRF, SOS Campaign and community stations themselves:

- NCRF/AIDC Community Broadcast Reflection Conference, Johannesburg, September 2009;
- Community Media Reference Group hosted by AIDC, Cape Town, April 2011;
- R2K Media Diversity Workshop, Johannesburg, July 2011; and
- SOS Campaign/R2K Community Broadcasting Workshop, Johannesburg, September 2011

One of the planned outputs of the research was the presentation of a draft of the research report to receive feedback from stakeholders before completing the final report. It was hoped that the DoC's planned workshop in March 2012 would provide the platform for this but the workshop was cancelled and there are no indications from the Department when it will be re-scheduled. FXI and AIDC will continue to identify possible opportunities to present this research.

Structure of the report

The first section provides a brief outline of the key new policy initiatives between 2009 and 2012 that has a bearing on community broadcasting.

One of the key outcomes of this research has been to develop a comprehensive and updated list of community radio broken down by type (geographic, community of interest and campus) and by district municipality. Section Two provides a very brief history of community radio in South Africa; graphs showing the distribution of community radio across provinces and district municipality and provides a 'state' of the sector by looking at some of the key issues that have emerged over the past sixteen years around four areas: purpose and impact, ownership, control and participation, organisational and financial sustainability and quality content (using a model called the Community Media Index developed by AIDC and NCRF). The views and experiences across the four dimensions gleaned from the interviews with the selected number of stations that was undertaken are also included here.

Some indication of the costs to set-up and run community radio stations is included.

Section Three looks at funding - with a primary focus on the MDDA - but also looks at some of the other sources of funding and support that is available to community radio in order to show some of the financial resources flowing into the sector. Section Four looks at the way forward and makes a number of recommendations.

Conclusions and Recommendations

"Community broadcasters must not only have resources to stay on-air, they must also have resources to ensure professional journalism; enable the creation of quality content relevant to the needs of their communities and importantly, community media should have access to sufficient resources to produce programming and facilitate participatory processes that ensure meaningful freedom of expression, access to information and community ownership and control of projects".

What emerges most clearly from the research is the need for more in-depth examination of the sector – the sector has grown to a significant size with a great deal of variation in levels of governance and sustainability and impact. But the time has come to ask come hard and difficult questions about the state of community radio - What does it mean that the richest province in the country has the largest number of community stations (beyond just frequency considerations)? What does it mean that in each province, the greatest concentration of community radio stations are in the urban centres? What does it mean when a radio station generates substantial advertising revenue and yet does not seem to have a rootedness in its community? How is this income used? Is it time to migrate some community radio stations to small commercial radio given the levels of revenue they generate and should be we looking at going back to the basics of what it means to be a community station?

The most crucial question that needs to be addressed is the extent to which community radio is a distinct tier of broadcasting; most particularly in terms of real and meaningful community participation, ownership and control, content and programming. Such an assessment must address the central question – to what extent are community radio stations fulfilling their key mandate as the voice of the voiceless? This means a greater analysis of the content that is being produced.

Much emphasis has been placed over the past 17 years of what is happening inside the station – and given the many challenges that still remain in this regard; this work must continue and be strengthened. But the lens now has to shift – to what is happening around the station – how are communities actually participating? To what extent have communities been able to exercise ownership and control over their community stations? This needs to also take into account class, political and power dynamics within communities.

And beyond this, at the core of the assessment must be the extent to which community stations have been able to reach out to a broad cross-section of the community and accommodate diversity of views and a determination of the extent to which communities have been able to exert real and meaningful participation, ownership and control or stations have been ‘captured’ by a small group in a community.

Given the growing anger and frustration amongst South Africans seen in the increasing rise in service delivery protests where the biggest issue is people’s sense of not being heard or having a voice, the question must be asked about the role community radio is playing in providing a platform for discussion, debate and dialogue.

Many of the stations surveyed report having good relationships with municipalities and did not raise any alarms about political interference. But one must recognize that there are many vested interests at station level to maintain the status quo – politically and economically. The limited figures presented in the funding section shows that money is flowing into the sector and some stations are doing very well financially; which also means there are individuals who are also doing well. Politically, there are also vested interests in a weak and fragile sector

More research needs to be undertaken to understand the resource flows into community radio and how it is being used and also to see what impact this has had on content. There is also a serious information gap about community broadcasting, much of which is in the public interest – MDDA’s website seems not be updated very regularly since there are no new decisions documents posted since the 2008-2009 financial year; ICASA’s website provides mostly information about processes and application dates, mainly focusing on the telecommunications and very community radio websites have annual report information. There should be a campaign to ensure public institutions are more proactive about providing information, particularly as these involve public funding.

The research reaffirms the need for a comprehensive overview policy overview given the wide range of changes the DoC has been attempting to effect through various policy amendments and new pieces of legislation. There are a number of key policy issues that have emerged that need to be considered more carefully for both their intended and unintended consequences – for example, the ECA’s changes to the licensing regime and that there seems to be number of pieces of proposed legislation seeking to centralize power in the hands of the Minister of Communications which is very worrying.

A key policy consideration is the licensing requirements for community radio – if a community station is licensed for 70% radio and 30% content at the outset, then how can it ever play the democratizing and transformative role envisaged for this tier of broadcasting? For activists, this points to the need to popularize the principles of community broadcasting and the NCRF Charter.

It is hoped that the research is useful in identifying what gaps exist and serves as a lobbying and advocacy tool for generate support to understand the sector better. It will also hopefully also serve to strengthen of the resolve of the community broadcasting sector, community media activists and broader civil society to ensure that the promised overhaul of the broadcasting policy landscape is implemented by the Department of Communications and is broad ranging in its engagement.

In terms of policy and the much anticipated policy review process it will be crucial to monitor and analyse what the implications are for community broadcasters. What is striking is how little the voice of community radio is heard. While it is not surprising given the current incapacity of the NCRF, the real danger is that many stations are have no idea of

what the proposals are and have not thought the implications for their running and functioning because they are too busy focusing on the day-to-day demands of running a station.

Given the reality that apartheid spatial geography has not been dismantled and the current neo-liberal framework shaping our policies at the moment, the success and sustainability of a station is inextricably tied to the socio-economic conditions of the community it is located in– this entrenches race and class divisions – the implications of this must be taken up at policy level.

Libby Lloyd outlines the following principles for public broadcast funding that are equally applicable to community radio: must be predictive to enable planning; protected from perceptions of political interference, levels of funding must be durable and justifiable, transparent and must be linked to public value.

Other research points to the fact that significant groups are still under-represented or un-represented in the media. These include women, youth and children, the LGBTI community, labour among others. The policy review process will need to look at this more carefully.

The Community Media Index is a useful tool for analysing key elements of community radio and if rolled-out beyond the initial pilot stage could provide invaluable insights into the nuances of community radio and at the same time, provide a worthwhile reflection for the station itself and the community it serves. AIDC and FXI have submitted a proposal to the MDDA for funding the rollout of the Index and are still awaiting a response from the Agency almost a year later. A more thorough examination of the content on community radio needs to be undertaken – this requires a monitoring and assessment of content and programming.

In terms of the MDDA, the study commissioned by OSF-SA looking at key institutions needs to be updated with a specific focus on measuring impact. A key measure of MDDA's ability to meet its mandate will be an assessment to which it contributes to diversity – beyond language – and is able to support projects that are critical of government and government policy. MDDA should also be lobbied to ensure that it prioritises support for programming, news and current affairs to enable stations to develop their news and investigate journalism.

Civil society needs to continue to campaign for, amongst others:

- Popularising the principles of community broadcasting;
- Taking community radio back to the people – mobilising communities to understand their rights over their stations
- Ensuring the independence of community media from all vested interests;
- Minimum quotas for community involvement in content production; and
- Quotas for local content that are clearly defined (particularly in the licensing process itself)

Depending on the outcome of the Ministerial Policy Review process, a new regulatory environment will either be full of opportunity or threats for community media. Creating spaces for dialogue, filling key information and research gaps and tracking and inputting into policy debates will and should remain the focus for the sector for the next year.

This policy review process potentially represents a significant overhaul of the policy architecture governing broadcasting in South Africa. Given that the community broadcast sector is amongst the most under-researched and misunderstood development sectors in South Africa, the review comes at a very opportune moment as it provides the community broadcast sector the opportunity to grapple with a number of key challenges – both in terms of the structure, governance and management of stations as well as issues related to policy and the enabling environment.

If a new policy framework is indeed going to be created it must build on the lessons accrued from 17 years of community broadcasting and not on a superficial understanding of the challenges, obstacles and opportunities.

Alternative Information and Development Centre (AIDC) and Freedom of Expression Institute (FXI)

The **Alternative Information Development Centre (AIDC)** was formed 12 years ago in response to the democratic transition in South Africa and the new opportunities and challenges it brought those seeking greater social justice within the democracy. AIDC has been working since 2009 to strengthen the community broadcast sector. AIDC's efforts have

included the development of the Community broadcast Index (a participatory self-assessment tool for media projects) as well as work with the National Community Radio Forum to engage with various policy processes and co-host a Community broadcast Reflection conference in October 2009.

The **Freedom of Expression Institute (FXI)** was established in 1994 to protect and foster the right to freedom of expression and to oppose censorship. Its vision is a society where everyone enjoys freedom of expression and the right to access and disseminate information. It sees the basket of expression rights, including Section 16 of South Africa's Constitution (the right to freedom of expression), Section 17 (the right to protest) and section 32 (the right to access information) as facilitative rights, without which access to most other Constitutional rights is impaired.

FXI was also instrumental in supporting the community-broadcasting sector in its formative days. In the early 2000's FXI set up a unit to provide the community media sector with information to inform lobbying and advocacy activities. The idea of founding a dedicated research unit that was first initiated by the NCRF in 2002 when it recognized of that the sector lacked a dedicated think-tank to advance the interests of the sector in policy and legislative debates.

Financial support from the Open Society Foundation (OSF-SA) made this research possible and is gratefully acknowledged.

(Disclaimer: The researcher worked at the Media Development and Diversity Agency as Project Director from June 2006 – September 2009 and is a member of the Right2Know National Working Group and Media Freedom and Diversity Subcommittee).

INTRODUCTION

1.1 Why a comprehensive, inclusive, transparent review of the broadcasting policy landscape is critical?

An important impetus for this research paper is the much-anticipated Broadcasting Policy Review that the Department of Communications (DoC) announced in 2010. The comprehensive policy review was expected to include a review of the 1998 White Paper on Broadcasting, an environmental scan of the broadcasting legislation and regulations currently in place; and undertake an economic modeling exercise to look at costs and the projected costs of digital migration and was expected to commence in 2011.

The DoC's recognition that a policy overhaul was largely necessitated by the imminent digital migration process but welcomed by civil society on the basis that there have been a plethora of policy changes since 1994 and that there was therefore an urgent need to undertake a comprehensive overhaul of the policy and regulatory framework in order to harmonise policy and take into account new trends and developments.

For over two years, SOS had been calling for urgent action on legislative and policy reform in the broadcasting sector. SOS has consistently pointed out there was "little option other than for the DOC to embark on a thorough, transparent and inclusive broadcasting policy review process" given that the proposed PSB Bill "would bring about significant changes to the entire broadcasting landscape and would repeal the existing Broadcasting Act, 1999 ("the Broadcasting Act")" and in light of the:

- Myriad of deep-seated structural financial and governance problems facing the public service broadcaster, the South African Broadcasting Corporation ("the SABC");
- Ongoing crises in the local television production sector largely occasioned by the financial and other crises at the SABC;
- Ongoing question of the sustainability of most of the country's community broadcasting stations; and
- Effects on broadcasting of paradigm-shattering technological changes brought about through convergence of media platforms

SOS further pointed out that the White Paper on Broadcasting (developed in the late 1990s) was outdated and did not constitute current government policy on broadcasting and that a new White Paper setting out a clear, comprehensive and coherent statement on current government policy on broadcasting was urgently needed and that the "Proposed Bill also clearly envisages significant changes to the entire broadcasting sector: public, commercial and community broadcasters as well as in respect of signal distribution, the role of the regulator etc. However the Bill makes no proposals for necessary consequential amendments to be made to, *inter alia*, the Independent Broadcasting Authority of South Africa Act, 2000 ("the ICASA Act"), or the Media Development and Diversity Agency Act, 2002 ("the MDDA Act"). Without these necessary consequential amendments it is likely that there will be inconsistent and indeed clashing provisions in the various pieces of legislation that regulate broadcasting – clearly not a desirable outcome".

1.2 Current Policy and Regulatory Landscape

The following section gives a brief outline of some key policy and regulatory amendments and initiatives the DoC and ICASA have issued between 2009 and April 2012 that have an impact or bearing on community broadcasting.

1.2.1 The Public Service Broadcasting Bill, 2009

In Notice No. 1409 published in Government Gazette No. 32663, 28 October 2009, the DoC published a "Public Service Broadcasting Bill, the Charter of the Corporation and the Charter of Community Broadcasting Services". Written

comments were initially invited for submission by 7 December 2009 but extended to 15 January 2010 after public outcry at the limited amount of time to make submissions.

Governance and Independence

The DoC has been considering the idea of community radio stations being housed in municipal offices to ensure greater accountability over equipment purchased with public funding since it first mooted this proposal at the 'Community Radio Sustenance in the era of Convergence Conference' held in Durban in March 2007. One of the more controversial proposals contained in the PSB was the suggestion that municipal officials be co-opted to serve as ex-officio members of community radio boards.

The NCRF submission reiterated its view of community broadcasting as independent of all powerful sectors of society – including government and commercial interests – and accountable to the broader community they serve. It applauded measures to ensure and increase government support (at all tiers of government) to community broadcasters and requested that such support be wide-ranging (i.e. not limited to the provision of office space or the presence of municipal officials on boards/councils) and that of central importance, was to ensure that any support was structured in such a way that it did not compromise the independence of community broadcasters. SOS also pointed out such a provision would infringe on community broadcasters' rights to freedom of association.

The NCRF submitted that:

- Government should not be represented on project Boards/Councils as it would 'raise the possibility of political interference; is inappropriate and could potentially impact on the independence of community broadcasters';
- Senior government officials and elected representatives of political parties should be barred from serving on Boards/Councils;
- Stations should be free to choose their locations and not be obligated to broadcast from local government offices;
- Government owned infrastructure should be protected through ownership contracts that clearly stipulates that the equipment and infrastructure is publicly funded and hence not the property of the station.

The NCRF felt that Section 22 and 23 of the PSB Bill and the various provisions of the proposed Community Charter appeared to introduce a 'one-size-fits-all' approach to governing structures for the sector and did not take into account 'community of interest' broadcasters nor that community broadcasters were constituted variously and through a range of non-profit entities (Section 21, Trust, etc.), all of which contain their own provisions and requirements around governance which may conflict with the provisions of the proposed Bill and Charter.

The NCRF submission highlighted:

- Any proposals should rather emphasize common governance principles and processes and enable each community to decide how to structure participation based on its own needs and conditions rather than a mechanistic, one-size-fits-all approach;
- Meaningful community participation in a station's governance is best achieved through a sector-based governance model that enables only civil society and community organisations to nominate and elect board members that represent sectors in that community;
- ICASA's capacity to monitor effectively should be enhanced and strengthened; and
- The NCRF's Charter was already in place so there was no need for the DoC to develop a Charter. Instead, support should be provided to review and upgrade the NCRF Charter into a compulsory sector charter that is endorsed by all sector associations.

A centralized fund

Another of the proposals contained in the PSB was for the creation of a centralized Public Service Broadcast Fund to fund broadcasting and to be administered by the MDDA - with a mandate to finance a wide-ranging set of functions, including the public service division of the SABC (and the new regional channels and international broadcasting services, content development, community broadcasting, signal distribution and a Broadcast and Signal Distribution Museum).

Again, civil society welcomed the proposed PSB Fund noting that community media is a public good and should therefore be publically funded. However, it also observed that the DoC had not undertaken the necessary research to establish the amount of money required to adequately fund public broadcasting; nor was it clear whether community broadcasting would have to compete with the SABC, commercial producers/broadcasters and Sentech for resources in the Fund. Questions around the how large the Fund should be; how it should be financed and administered (including criteria outlining who would be eligible to apply for funding) and the independence of the Fund from the Executive arm of Government were also identified as gaps.

In their submission to the DoC, the National Community Radio Forum (NCRF), while broadly welcoming the intent to ensure greater sustainability for community broadcasters, raised a concern that the expanded mandate of the Media Development and Diversity Agency (MDDA) could lead to a “marginalization of community broadcasting and a reversal of gains already achieved by the sector.” It noted that in terms of current legislation governing the MDDA, 60% of the Agency’s fund was ring-fenced for community media and was keen to ensure that any policy changes did not lead to reduced funding to the sector. The NCRF also indicated its concern at the lack of economic modeling or research on the projected levels of revenue that would be generated by the proposed 1% tax and that in the absence of such data, there was a real danger that “the PSB Fund will be insufficient to cover the costs of the public broadcaster, let alone all the other contenders for funding in terms of the proposed Bill.”

The NCRF’s submission also contained three key recommendations: any funding formula should ring-fence support for community media development; there should be an annual subsidy from the state for stations that comply with regulations and accountability requirements – “on the basis that community broadcasting and information was in the public interest”, and that preferential rates for transmission costs for community broadcasters be introduced as a crucial sustainability intervention. The negative impact of these high rates came through strongly in interviews with community radio stations. For many, this cost, together with staffing, were the biggest areas of expenditure.

On the 26th April 2012, just as this report was being finalised, Sentech announced subsidised signal distribution rates for community broadcasters². This announcement was a landmark victory for community media activists and broadcasters who had been campaigning for this for years and it will make a significant difference to the sustainability of the sector.

Powers of the Minister

The NCRF also indicated that it was against any proposals giving the Minister of Communications powers to issue directives to community media and instead, recommended that ICASA be strengthened to monitor compliance and make the necessary corrective measures when non-compliance occurs; and that the NCRF should also be resourced to ensure that it plays its important monitoring role and assists the capacity of community radio to improve its compliance – a self-regulatory approach.

Finally, a comprehensive policy review

While former Minister of Communications, Minister Roy Padayachie withdrew the PSB Bill in favour of a wide-ranging, inclusive review process in September 2011, Cabinet re-shuffling in October 2011 led to the appointment of a new Communications Minister, Ms. Dina Pule. By early 2012, there had been little significant information or progress in this regard despite Minister Pule’s re-affirmation of the Department’s commitment to such a review.

Then, in April 2012, at a DoC hosted ‘ICT Policy Colloquium’, the DoC announced that there would be a green paper in 2012, followed by a white paper by the end of 2013 as well as its intention to set up a panel for this process.

In the same period, ICASA indicated that it would hold oral hearing on the ‘Issues Paper: A Review of the Broadcasting Regulatory Framework towards a digitally converged environment’ in early May. Both SOS and R2K have been invited to make oral representations. R2K’s submission will be guided by its Summit resolutions:

- To campaign to strengthen ICASA to ensure that it functions and regulates courageously in the interest of the public, and not government and commercial interests;

² Please see www.sentech.co.za for press statement.

- Campaign for the adequate and sustainable funding of community media. Community media should not be overly reliant on market sources of funding;
- Campaign for the adequate funding of the MDDA and to ensure that it is independent, more effective, and that it is more transparent and accountable in its processes, so that it fulfils its mandate of growing and diversifying the media;
- Ensure that community stations are democratically owned and controlled by the community, and to support communities in claiming their ownership and participation in their stations,
- Explore possible anti-trust measures to limit the concentration of media ownership;
- Engage in the policy review process on the far-reaching Public Service Broadcast Bill that is to be conducted by the Department of Communications to ensure that these resolutions and principles are applied and upheld in any legislation.

According to the DoC's 2010-2011 annual report, a second draft of the Public Service Broadcasting Bill was prepared and a separate money bill on the funding of the public broadcaster was also prepared.

1.2.2 Local Content, 2009

In September 2009 the DoC published in its "Local and Digital Content Development Strategy" and a Local Content Summit was held in mid 2010. The strategy was formulated in anticipation of the multichannel environment presented by broadcasting migration to spur content development in South Africa to: further job creation; to discuss key interventions to eradicate factors currently inhibiting growth of the content industry in South Africa (including funding and infrastructure investment) in order to address developmental goals relating to the imbalances of the past, building social cohesion, ensuring competition in the content industry and fostering regional integration.

SOS made the following points in its submission:

The Local Content Strategy proposed the establishment of a plethora of new bodies to support the content production industry - a Digital Content Fund (to be managed by the MDDA and that the Digital Content Fund be part of a proposed broader Public Service Broadcasting Fund); provincial Content Generation Hubs; a Local Content Advisory Body (representing government, industry and related sectors to monitor and implement government's strategy); video rental facilities specialising in local content; and Trusted Digital Repositories to be located specifically in rural areas. Yet, a major gap in the strategy was the lack of specific information related to the establishment and running costs of such bodies - or sustainability issues. There were no details as to the Fund's exact purpose, the composition of the Fund's Board, appointment of the Board, amounts of funding to be provided and for what, and the criteria for accessing funds etc. and no set-up and running costing were provided.

It also pointed that out that there were no details or discussions about how to safeguard the Fund from the influence and interference of powerful vested interests and it was unclear how the Digital Content Fund would fit within the Public Service Broadcasting Fund, because of the lack of clarity about the PSB Fund.

While SOS strongly endorsed the Department's proposal to offer financial support, it felt that the details of this support needed to be discussed; particularly given that the strategy presumed the establishment of a Public Service Broadcasting Fund. While the concept of Content Generation Hubs (CGHs) was seen as positive, it was felt that the Department had not done sufficient research as regards their establishment, geographic location, operations etc. For instance, a big question was how sustainable would they be if located in areas removed from the industry.

While SOS supported the principle of content in local languages as it fulfilled a number of needs including cultural and education needs, it was not sure what the logic was behind the DoC's support for particular kinds of content and not others - the Strategy prioritised government support for the following types of content: animation, wild life, documentaries, games and ring tones. SOS also pointed out the additional problem of not distinguishing between broadcast content and broadband content and not recognizing that different strategies were required to support these very different kinds of content. SOS asked that the DoC clarify why these content choices had been made – for example, why was support for wild life content generation prioritised when it was already a strong sector and why documentaries were prioritised rather than drama.

In terms of the proposed setting up of a Content Regulatory Coordination Board comprising of members representing ICASA, government, relevant sub-sector bodies, cyber lawyers, South African Police Service members and members of the public with expertise in cyber security issues, intellectual property protection and other relevant skills to coordinate regulatory matters, SOS believed that this Board seemed to have worrying powers and to have a specific mandate to censor information and asked that the purpose of this Board and its mandate be re-thought completely.

The National Film and Video Foundation (NFVF) furthermore raised a number of concerns in its submission to the Department; particularly in terms of the impact of this strategy on its own role. Sadly, the voice of community broadcasters has not yet been heard on this piece of proposed legislation; largely because since 2009 the NCRF has been experiencing severe funding and capacity constraints and is no longer playing a strong coordinating role for the voice of the sector.

1.2.3 ICASA Amendment Bill, 2010

The DoC published the “Independent Communications Authority of South Africa Amendment Bill” (the proposed ICASA Bill) in Notice No. 650 in Government Gazette No. 33324 on 25 June 2010. The deadline for written submissions was set for 25 July 2010.

In its submission, the NCRF acknowledged that compliance and accountability needed to be enhanced and strengthened in the sector; and believed that this should be driven by the principle of self-regulation with the community radio sector setting up its own frameworks, standards and processes. In summary, its submissions were:

- Ownership and Control models impact on the governance and sustainability of licensees.
- The perceived lack of capacity around the monitoring and compliance in ICASA and called for ICASA to be strengthened and better resourced to enable it to monitor function more effectively and meaningfully - including increasing capacity and skills, research skills and provincial offices. It supported the need to strengthen the Complaints and Compliance Committee (CCC) based on best practice in community radio development in South Africa and internationally.
- The lack of compliance the part of radio stations and the perceived lack of proactive regulation by the community broadcasting sector itself.
- It welcomed those amendments aimed at ensuring that ICASA operates more efficiently and for improving turnaround times but noted that it was important for turnaround times to be benchmarked against international and local best practice.
- The NCRF did not believe that the appointment of members of the CCC should be nominated by the Minister as contemplated in Subsection 10(a) of the Proposed Bill as it reduced ICASA’s power and was a threat to its institutional independence. “The CCC must be managed by and accountable to ICASA without any threat of political interference’.
- In respect of Section (10b), it felt that ICASA itself should decide how to manage the work of the CCC based on an assessment of whether such a function is needed on a full-time or part-time basis and moreover, that for accountability and management purposes, the Chairperson should be responsible for overseeing the work of the CCC.
- It felt that Section 14 of the Proposed ICASA Bill gave the CCC the regulatory role that should be played by ICASA by making the CCC responsible for findings and for issuing orders instead of ICASA. The NCRF argued that ICASA should be allowed to retain discretion over whether or not to accept a recommendation from the CCC in order to perform its function as the independent broadcasting regulator acting in the public interest.

1.2.4 Digital Migration, 2011

The DoC drafted a Broadcasting Digital Migration Policy in September 2008 and in August 2011 an amendment was tabled. The amendment included Cabinet’s decision to adopt the DVB-T2 digital standard and also extended the analogue switch off date from November 2011 to December 2013. Further to the Digital Migration Policy, ICASA tabled a number of draft regulations.

ICASA withdrew the Digital Migration Regulations passed in February 2010 and in September 2011 it tabled Draft Digital Terrestrial Television (DTT) Regulations.

Some of the key differences between these regulations and previous regulations are:

- The new regulations specify the new digital standard - DVB-T2. Originally Government adopted DVB-T and also flirted with the idea of adopting a Brazilian/ Japanese standard. The Regulations clarify that DVB-T2 has been formally adopted.
- There is a reduction in the capacity allocated to the SABC, e-TV and MNet on the new digital multiplexes (i.e. Multiplex 1 and 2) but the regulations claim these broadcasters will still have more capacity than they were allocated under the previous standard, DVB-T.
- Community broadcasters will be allocated 10% of multiplex 1 (that is the multiplex dedicated to the SABC). Previously only one community TV broadcaster was included - Trinity Broadcasting Network.
- A percentage of both multiplexes are reserved for future use. (Multiplex 2 includes M-Net and e.TV).

The migration from analogue to Digital Terrestrial Television (DTT) in the main affects television and not radio; so while it impact more on community television, the MDDA argues that digital radio will lead to more licensing opportunities, leading to more radio stations, diverse content, languages, views and opinions.

1.2.5 Electronic Communications Act Amendment, 2011

In November 2011, the DoC tabled an Electronic Communications Act Amendment (which also incorporated the National Broadband legislation document according to the DoC's 2010-2011 annual report). The proposals evoked widespread criticism across industry and civil society and were quickly withdrawn a few weeks later. However, in January 2013 Minister Pule said the Electronic Communications Amendment Bill would be released for public comment in the first quarter of 2012 following consultation with all relevant stakeholders.

The stated purpose is to amend the Electronic Communications Act, 2005, so as to:

- Clarify and strengthen the role, powers and functions of the Minister and the Authority;
- Improve turn-around times for consultative processes;
- Make provision for policy on ownership and control;
- Revise the role of the Minister and the Authority in respect of frequency spectrum management;
- Refine licensing issues; to improve the competition provisions;
- Remove regulatory bottlenecks; and to provide for matters connected therewith.

What it proposed:

- Ensure that ICASA and the USAASA follow policy directions issued by the Minister (currently ICASA and USAASA only need to consider policy directions)
- Change the distinction between individual and class ECS licences to coincide with the distinction between individual and class ECNS licences, namely geography - class licences will be municipal and individual licences will be national or provincial
- Eliminate the need for an invitation from ICASA for individual ECS and ECNS licence applications
- Strengthen ICASA's authority over transfers of control of licences and allow ICASA to regulate for ownership restrictions
- Limit the number of class licences any licensee may hold - to two
- Shorten the registration process for class licences from 60 to 10 days
- Give the Minister control over spectrum planning (now, most of the control over spectrum planning rests with ICASA)
- Remedy drafting defects in the current provisions relating to interconnection, facilities leasing and competition matters
- Set up two additional government committees, one for spectrum and one for broadband

Criticisms leveled against the proposed amendments to the Electronic Communications Act included the fact that it was unconstitutional and a threat to the independence of the industry regulator, claiming they give too much power to the minister and the Department of Communications. "Of major concern is that the ministry wants to have more power over the management of the radio frequency spectrum, a role that might result in a conflict of interest since the

government has shares in companies that are interested in accessing the scarce and lucrative spectrum.”³ The amendments effectively deprived ICASA of its independence, particularly regarding the licensing of the radio frequency spectrum and also ran contrary to the provisions of the ICASA Act, which establishes ICASA as an independent regulatory authority free from political and commercial interference.

The SOS Coalition concurred with this view - "This effectively curtails Icasas ability to regulate independently and that is unconstitutional," said the coalition's lawyer, Justine Limpitlaw and pointed out that there is no sense in tabling this legislation, as it should form part of the broadcasting policy review process.

Industry reaction highlighted the dangers of inefficient spectrum management and political interference. Techcentral⁴ quoted GSM Association's director of market development and spectrum policy, Peter Lyons as saying "it's hard to see how making these changes is a good move. To move spectrum licensing out of the domain of the regulatory body and shift it into the policy-making body could create some problems down the road. Decisions will be more susceptible to outside influence when you take them out of the portfolio of the regulator and move them into more of a ministerial role." This could result in "less efficient" allocation of spectrum to operators that are "not necessarily the most competent" or who don't have the "experience and capacity to make the investment and deploy networks". It could result in spectrum going to "parties who may not have a strong track record, such as Sentech, for example".

Of significance to community broadcasters is the proposed change to the definition of community, which suggests a shift away from the current definition, which includes both a geographic community and a community of interest to only a geographic community:

"(d) by the substitution for the definition of "community of the following definition: "'community' [**Includes a geographically founded community or**] means any group of persons or sector of the public having a specific, ascertainable common interest;"

{e} by the substitution for the definition of "community broadcasting service" of the following definition: "'community broadcasting service' means a broadcasting service which:

- (a) is fully controlled by a non-profit entity and carried on for nonprofit purposes;
- (b) serves a particular geographically defined community;
- (c) encourages members of the community served by it or persons associated with or promoting the interests of such community, to participate in the selection and provision of programmes to be broadcast in the course of such broadcasting service; and
- (d) may be funded by donations, grants, sponsorships or advertising or members

1.3 A shortage of information and research

The South African community radio movement is based on the belief that radio is the most affordable, egalitarian and accessible communication technology available and should be harnessed, at the community level, to carry forward the country's reconstruction and development. The South African community radio movement supports the definition of community broadcasting in the Windhoek Charter on Broadcasting in Africa (2001): "Community broadcasting is broadcasting which is for, by and about the community, and whose ownership and management is representative of the community, which pursues a social development agenda, and which is non-profit".

There are currently over 170 community radio stations broadcasting to almost all urban and peri-urban townships and many rural villages in South Africa. The South African Advertising Research Foundation (SAARF) reported in June 2008 that these stations collectively have 7 200 000 daily listeners. A separate household survey conducted amongst listeners of 15 community radio stations by the Community Agency for Social Enquiry (CASE) found that 95% of respondents listen to their community radio stations daily. In 2011, SAARF reported a reported a listenership of 8,840 million for community radio

³ <http://www.businessday.co.za/articles/Content.aspx?id=158563>

⁴ <http://www.techcentral.co.za/govt-under-fire-over-ec-act-amendments/27359/>

One of the key strengths of community radio is its diversity and geographical spread – community radio stations work with diverse constituencies right across South Africa in urban settings as well as in the rural periphery bringing together different gender, race, age, political, and socio-economic groupings.

Many of these projects are stable and self-sustaining despite the many challenges they face in generating income, quality content and meaningful community participation. Despite these challenges, some community radio stations, through their programming, news, and attention to local language and culture, have established themselves as unique voices in the South African media.

On the other hand, radio stations are beset by a host of challenges including: inadequate funding (as a result of problematic funding model); management, capacity, governance and content.

While there are encouraging signs of research interest in community radio in South Africa over the past couple of years, there is still far too little information about a sector that has grown so significantly. Worryingly, little consolidated data exists on the community broadcasting sector – MDDA has information related to the stations it supports, NCRF has a list of its member stations and various other bodies like The Media Connection, GCIS, etc. also have lists of stations that they interact with. The latest information that could be sourced from ICASA was a 2011 consolidated list of broadcasting licensees; this list is not broken down in any way – not by province or type of licensee and is simply an alphabetical list of all electronic communication licenses issued by ICASA.

In the course of this research, and building on a list of community radio stations initiated by the SOS Coalition, an effort has been made to develop a comprehensive list of stations. The list has been organised by district municipality to provide more insight into how stations are spread across the country.

Encouraging recent initiatives include the Wits Radio Academy at the University of the Witwatersrand, which has started developing a research arm with part of its focus on the challenges and opportunities facing radio and includes a specific focus on community radio. It also hosts an annual 'Johannesburg Radio Days' Conference. Last year's programme looked at a variety of topics including the impact of convergence and programming. Students at a number of universities, some of which have been referenced in this report, have also started researching community radio. More studies that look closely at what is happening at station level and the community it serves are needed – particularly around programming, news and community participation in programming and governance.

COMMUNITY RADIO IN SOUTH AFRICA

2.1 The current broadcasting landscape in South Africa

In summary, the broadcasting landscape in South Africa across the three tiers of broadcasting (public, commercial and community) in 2012 looks like:

Television

- Three Public national free-to-air broadcasting services (SABC)
- One commercial national free-to-air broadcasting service (e-TV)
- One terrestrial subscription broadcasting service (M-Net)
- Six community television stations (TBN, Soweto TV, One KZN (formerly Bay TV), Cape Town TV, Tshwane TV and Rustenburg TV).
- Five satellite based television broadcasting services (Multichoice/DSTV, On Digital Media (Top TV), *Walking for Water* (not operational yet), *Telkom Media* (not operational yet) and *E-sat*. (not operational yet)

Radio

- 18 Public Sound Broadcasting Services (SABC)
- 15 Commercial Free-to-air Sound Broadcasting Services
- 120 Community Sound Broadcasting Services
- In addition there is 1 satellite based commercial sound broadcasting service (formally called WorldSpace/YAZMI), which had permission to continue broadcasting until ICASA has dealt with its application.

Broadcasting Signal Distribution

- 1 Category One Licence – Common Carrier (Sentech)
- 1 Category Two Licence – Commercial (Orbicom)
- Some Community Sound Broadcasters are licensed to self-provide their own signal distribution as Category Three Broadcasting Signal Distribution licences.

2.2 A brief background and history

“the vision of the community radio sector is to advance participatory democracy towards sustainable development on communities. Participatory democracy encourages people to become involved in the decision-making process and to drive development. This means the station plays an active role in creating platforms for debate, discussion and the community is encouraged and empowered to shape their development and express their views freely.” (NCRF Charter)

The South African community radio sector has come a long way since the heady days of the *Jabulani! Freedom of the Airwaves Conference* in 1991. The Conference established the key principles that would guide post-apartheid broadcasting legislation:

- The establishment of an independent body to legislate broadcasting;
- A three-tier broadcasting system comprising commercial, public (not state) and community broadcasting; and
- A definition of community broadcasting based on the principles of community ownership, control and participation.

The major features of community radio are:

- Should be fully controlled by a non-profit entity and carried out for non-profitable purposes
- Serve a particular community
- May be funded by donations, grants, sponsorship or advertising or membership fees, or by any combination of these

These principles found expression in the Independent Broadcasting Authority Act of 1993 (IBA Act) and continues to be entrenched in the Electronics Communication Act (2005).

Both Tleane (2005) and Olarunnisola (2002) provide a good description of the history and background to the community radio sector, and set out how the prevailing political context and pressures influenced way the broadcasting sector, and community radio specifically, evolved. Jansen's study is an important contribution about the impact of neo-liberalism on the sector and how it has shaped its unfolding.

Tleane identifies four major strands for the origins of community broadcasting in South Africa:

- The alternative media movement which openly opposed the apartheid regime and joined forces with the liberation movement
- Stations whose founders wanted to pursue certain interests – religious and political in some cases, like some of the conservative Afrikaans stations
- Stations founded by community 'activists' who wanted to create a platform for community expression
- Entertainment based stations founded by young people with a DJ mentality (or to emulate a commercial station).

In 1994, Bush Radio, and Radio Zibonele in the Western Cape received the first community radio licenses from the Independent Broadcasting Authority (IBA); ICASA's predecessor. Both these stations were established by community activists in Cape Town with Radio Zibonele starting out as a health awareness project in Khayelitsha Township and Bush Radio as a cassette project at the University of Western Cape.

By August 1995, the IBA had licensed 82 community radio stations. Initially these licenses were temporary licences valid for a year (Olorunnisola, 2002). In 1996, the IBA introduced a four-year license for community radio.

Since then, over 170 stations have been licensed reflecting one of the key strengths of community radio: its diversity and geographic spread – community radio stations work with diverse constituencies across South Africa in urban settings as well as in the rural periphery bringing together different gender, race, age, political and socio-economic groupings. However, in March 2012, the DoC said that while over a 133 community radio stations have been licensed in South Africa since 1994 only 100 are still operating.

Despite emerging out of and born of the struggles of a rich history of alternative, radical media, the post-apartheid lexicon has favoured 'community media' ascribing a more passive, conduit of government and developmental information role to this medium. It is interesting that it was the legalistic definition of community broadcasting that triumphed rather than a more a progressive and active role definition given our history and the major role the media played in our struggle against apartheid.

Kruger (2011) describes the importance and significance of the growth in community radio as "the project to create and build community broadcasters as an entirely new arena for public discussion, geared specifically for poor and marginalized groups, has to be seen as a deliberate and programmatic attempt to create local public spheres and to balance what was seen as a mainstream media not sufficiently attuned to the new order and its values. The phrase 'voice of the voiceless' is often used to capture this purpose.

He goes on to point out that "Whereas initially grounded on the foundations and ethos laid by the alternative press the unique feature of the community radio sector is that it owes its ultimate birth and initial successes to the corresponding birth of the new political dispensation. Thus, in many ways, it can be said that the sector was compromised from the beginning....the sector in South Africa was *born with the new democratic dispensation* rather than *born within a democratic set-up* as in other countries".

Tleane sees 1996 as marking a turning point for the alternative media movement. By the second round of the official licensing process, a substantial shift had taken place and most of the stations that received licenses were not linked to the alternative media movement and the alternative media movement disintegrated.

Bresnahan (2007) paints a similar picture of 17 years of community radio in Chile "After a mass democratic movement ended the 17 year Pinochet dictatorship in Chile in 1990, social activists saw community radio as an ideal medium for

participatory democracy and for articulating grassroots needs and demands. However, the initial upsurge of grass roots radio activism was squelched by government delay in enacting enabling legislation. The provisions of the law that was eventually approved made the license application process onerous for grass roots organizations. Community radio was also adversely affected by the overall decline in grass roots social activism, which reflected widespread disillusionment with the government's limited reform agenda and deliberate government policies to bring about social demobilization. As a result, although community radio has become well established, with over 300 legal stations plus others operating without a license, it has not fully realized its potential as a social activist and democratic medium."

2.3 The broader context shaping the community broadcasting sector

As Weinberg points out in the R2K Discussion document on Community Media (2011) "in practice challenges in the context have led many community media projects to stray from the vision, values and purpose contained in the NCRF Charter, it remains as relevant today as it was when media projects gathered to adopt it." But in a broader neo-liberal economic policy framework, existing class lines have been redrawn and this sector is caught, like that of public broadcasting, between the market and the state for the bulk of its support. If these tiers of broadcasting, and community broadcasting in particular, are truly to be 'voice of the voiceless', these broader environmental challenges will need to be addressed.

Added to the challenges faced by the sector, the NCRF is experiencing significant organisational challenges and is not in a position to offer leadership and coordination in its current state. As a result, the community broadcast sector remains largely voiceless at a time that may well determine the terrain in which the sector will have to operate in for decades to come.

Weinberg (2011) provides an excellent overview of some of the key trends shaping our terrain and of the complex environment and context in which South Africa's community media operates:

"More than 17 years after the collapse of formal Apartheid, South Africa still faces many challenges of entrenched and structural inequality and poverty. Massive unemployment, an impacting HIV/AIDS epidemic, high levels of rape and other gendered violence, limited agrarian reform leaving Apartheid era land ownership patterns intact, deepening rural poverty, and increased urbanization, under-investment in social services (e.g. education, health, and the criminal justice system), and environmental degradation are but some of the manifestations of Apartheid's legacy and the democratic state's perusal of neo-liberal economic policies.

Despite these considerable obstacles to South Africa's fight against inequality some gains have been made in the last two decades. The introduction of democratic dispensation has seen a transformation of institutions of governance to include all South Africans with an emphasis on participation and consultation. The 1996 Constitution offers South Africans a framework to access basic human rights as well as socio-economic rights. The raft of progressive legislation intended to dismantle apartheid and create greater access to opportunities and forms of participation in governance and the allocation of resources have been undermined by the government's fixation with fiscal austerity and social cohesion. This has posed a challenge to a vast number of South Africans who remain trapped in exploitative gender relations, work relations, or under the rule of undemocratic 'traditional leaders' and conservative economic policies that seek to commodify public and private spaces and limit state expenditure on social services.

The democratic state has demonstrated limited capacity to respond to the demand for socio-economic justice. Attempts to transform and capacitate government have been restricted by fiscal austerity, dependence on apartheid era and private sector technocrats, low moral, and corruption. This has proven particularly true of Local Government who – in many cases – have been given the mandate to deliver key elements of social justice. The past 17 years have witnessed an erosion of the mass based and participatory traditions that the ANC inherited from the United Democratic Front. An electoral system of proportional representation, party lists, and the ANC's mechanism of List and Deployment Committees results in party power being centralized in the hands of a few.

The post-apartheid era has also seen the demobilization of the organized civil society that was central to the collapse of apartheid. Progressive Civil Society Organizations (CSOs) – exemplified by some NGOs, CBOs, COSATU, and the SACC – have struggled to define their role in the post-apartheid dispensation in relation to the state and private sector. A

leadership drain, reduced and constricted donor funding are often cited as reasons for their limited impact. Attempts to promote socio-economic justice through technocratic mechanisms of research, lobbying, and public relations have proved largely ineffectual.

Many organizations seeking a more just social order have prioritized lobbying the state over engaging with those affected by poverty through popular education and mobilization. Programmes that declare an intention to engage the poor tend to underestimate the scale and complexity of required interventions and resort to piecemeal and small-scale (often unsustainable and often unsustainable and symbolic) activities.

Recent years have seen an upsurge of popular ‘service delivery’ protests and widespread frustration and discontent amongst the majority of South Africans – evidenced perhaps best by the popular anger that the President Jacob Zuma was able to exploit in his bid for the Presidency. Sadly, Zuma’s government has inherited the contradictions, limits, temptations, and challenges of its’ predecessor and the extent to which the government can defuse popular anger will be determined by the extent to which it can address their historical demands for socio-economic justice. These trends confirm the historical lesson that social change requires grass roots and wide spread popular mobilization and a robust community media – independent of the state and commercial interests - has an important role to play in this regard.”

R2K is taking up the baton to re-energise the debate about the role of community media beyond a mere conduit of development information – “community media, independent of the state and private sector and accountable to marginalized communities, has the potential to play an important role in deepening democracy and advancing socio-economic rights. It is a critical link in the democratic system, facilitating a dialogue, and enabling social change to emerge from grassroots and reach national and international stakeholders. Community media also provides citizens an avenue to exercise their constitutional rights to freedom of expression and access to information, as well as serving as a conduit to hold elected officials and public servants accountable.” R2K Discussion document on Community Media (2011)

2.4 Painting a picture of the community radio landscape in 2012

South African broadcasting legislation specifies two types of community broadcasting services – those serving a geographic community (and theoretically serving the needs of all residents in the area) and those serving a community of interest (defined by Tacchi as a ‘having a specific, ascertainable common interest – a common interest that makes such a group of persons or sectors of the public an identifiable community. These may be institutional, religious or cultural communities.” A third type of community radio also exists -campus-based stations.

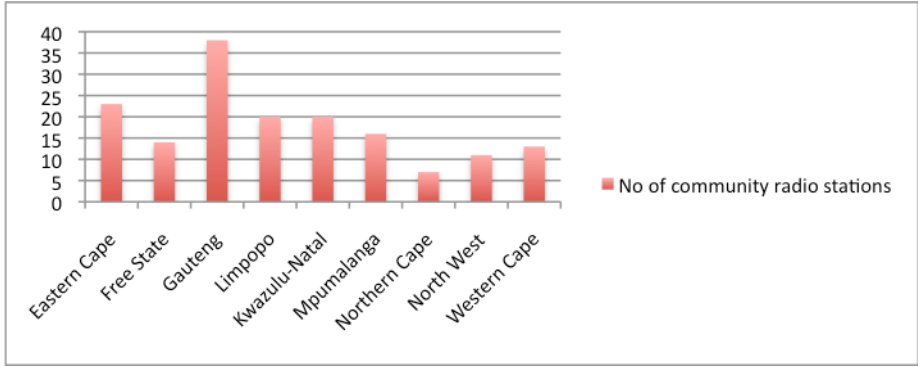
While very little consolidated data exists on the sector and what information is available is insufficient. ICASA does not appear to have a separate list of licensed community stations, let alone a breakdown by province or municipality. There does not appear to be any readily available information on the status of each community station so it is hard to get a sense of whether the stations are broadcasting or not. Based on the cumulative information sourced from ICASA, GCIS, MDDA and NCRF it would appear that there are about 170 that are licensed, though as indicated earlier, it is unclear how many of those are broadcasting. The following section provides a breakdown of station by province and district municipality and also by type (geographic, community of interest or campus).

Table 1: Breakdown of community radio by type and province

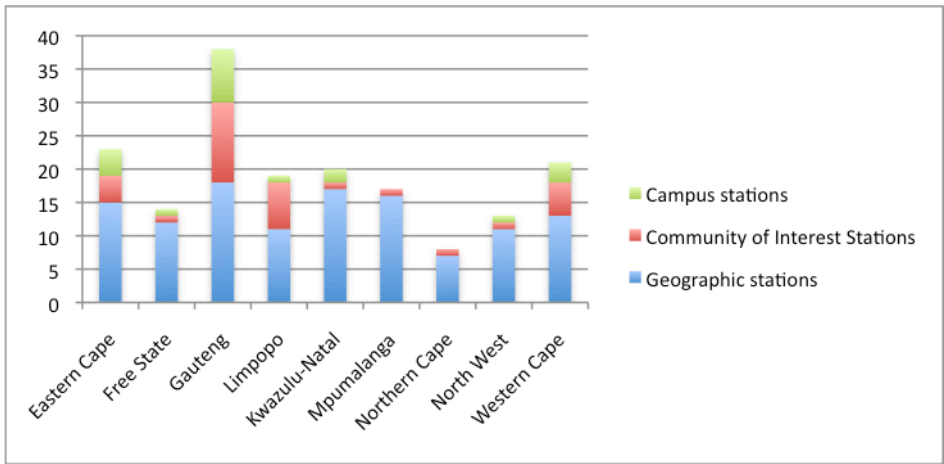
Province	Geographic stations	Community of Interest Stations	Campus stations	TOTAL
Eastern Cape	15	4	4	23
Free State	12	1	1	14
	17	1	2	20
Gauteng	18	12	8	38
Limpopo	11	7	1	19
Mpumalanga	16	1		17
Northern Cape	7	1		8
North West	11	1	1	13

Province	Geographic stations	Community of Interest Stations	Campus stations	TOTAL
Western Cape	13	5	3	21
TOTAL SA	120	33	20	173

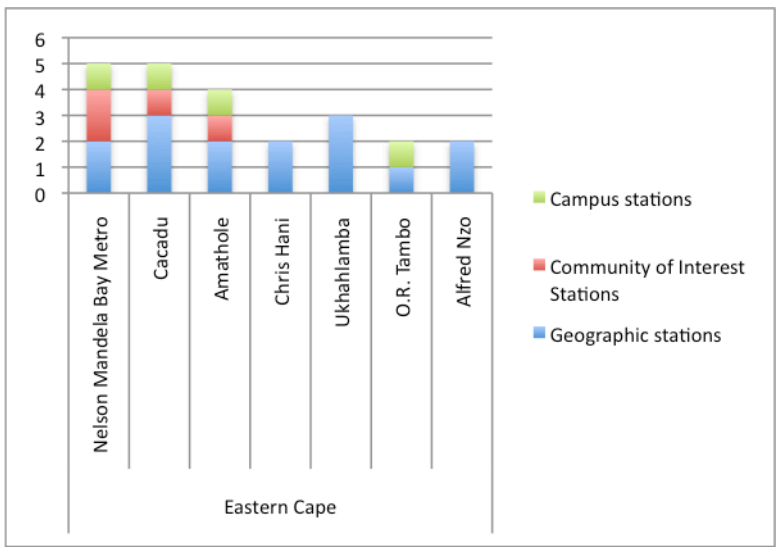
Graph 1: Total number of community radio stations by province



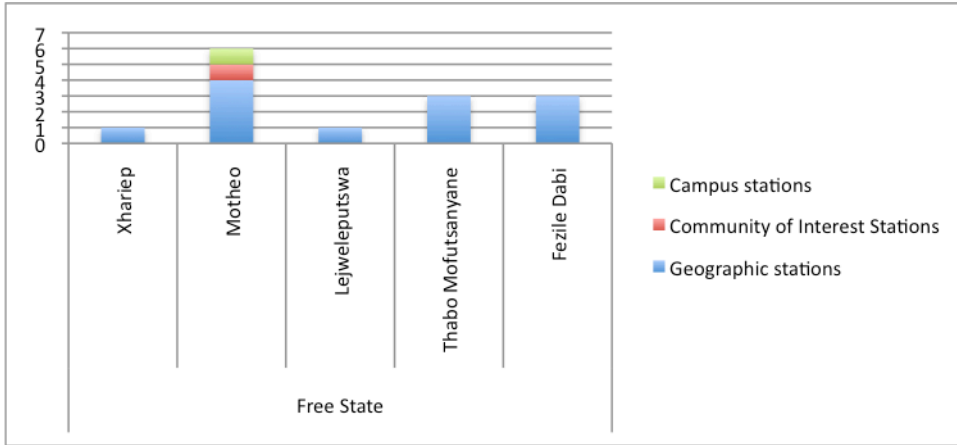
Graph 2: Breakdown of community stations by type and province



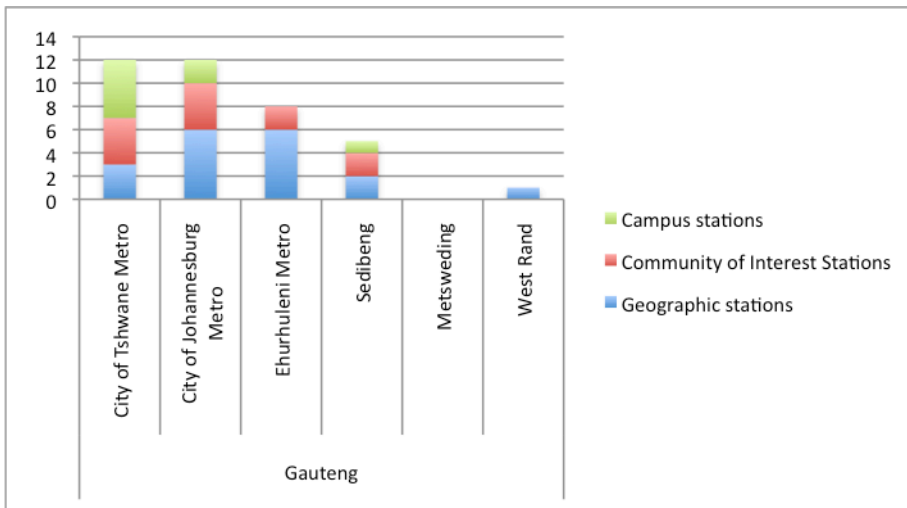
Graph 3: Eastern Cape by district municipality and type



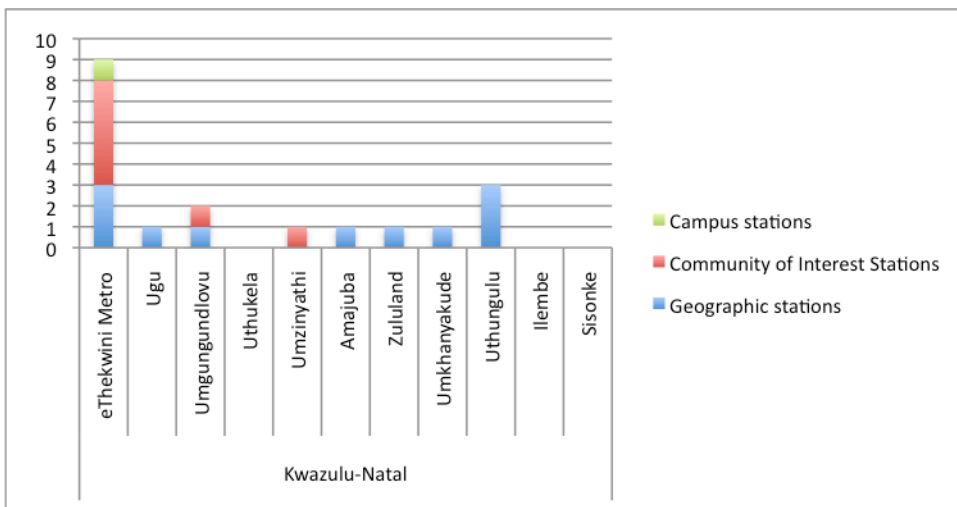
Graph 4: Free State by type and district municipality



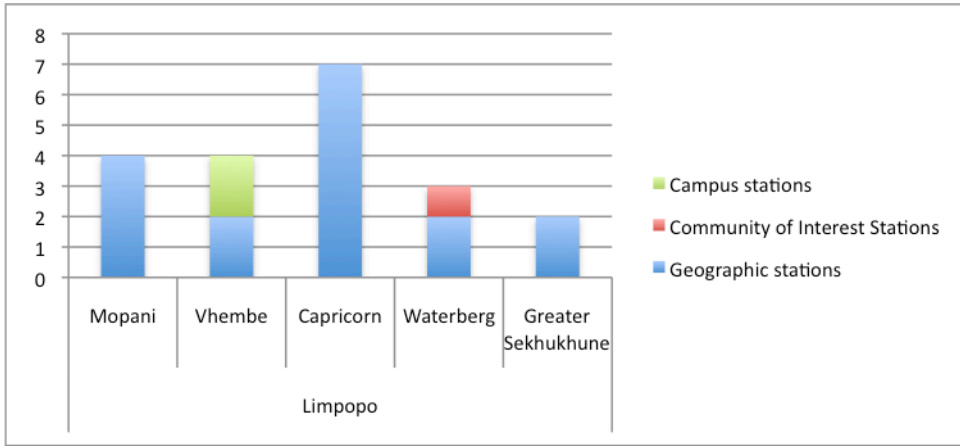
Graph 5: Gauteng by type and district municipality



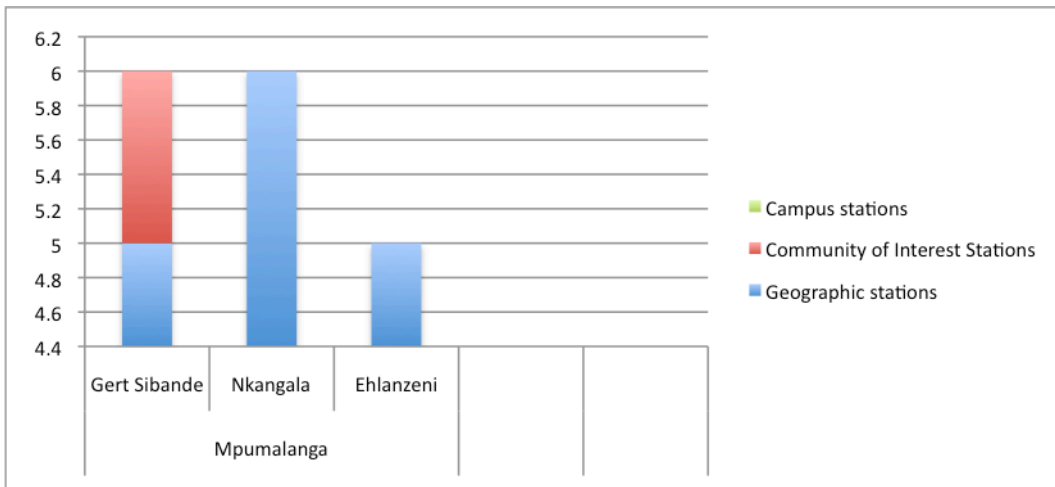
Graph 6: Kwazulu-Natal by type and district municipality



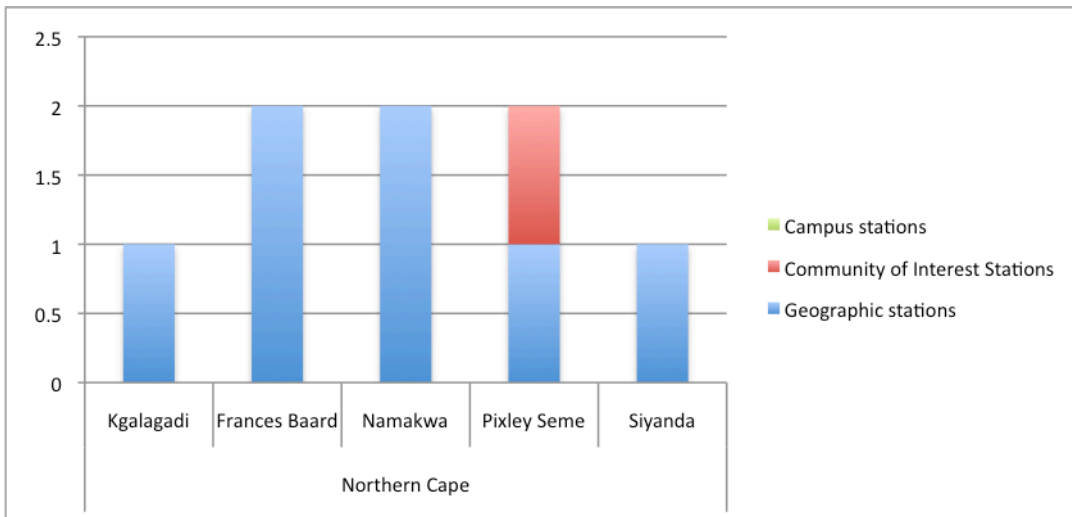
Graph 7: Limpopo by type and district municipality



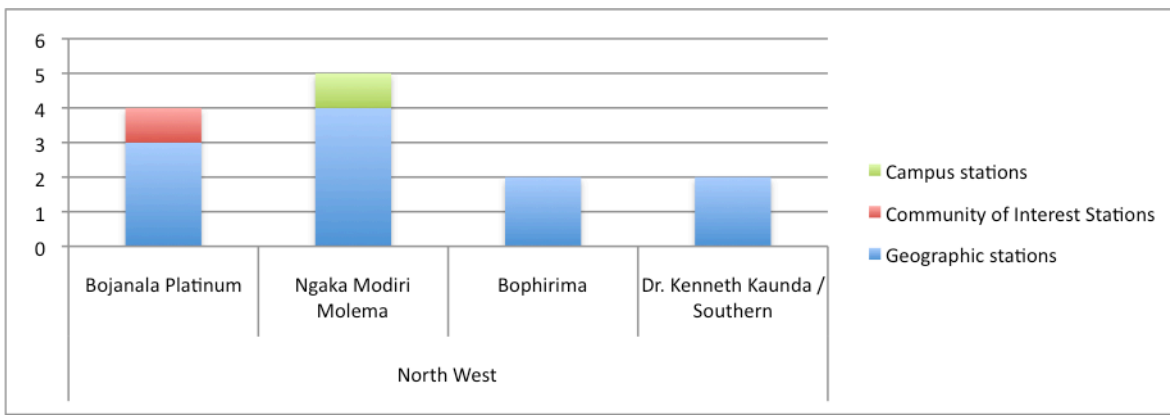
Graph 8: Mpumalanga by type and district municipality



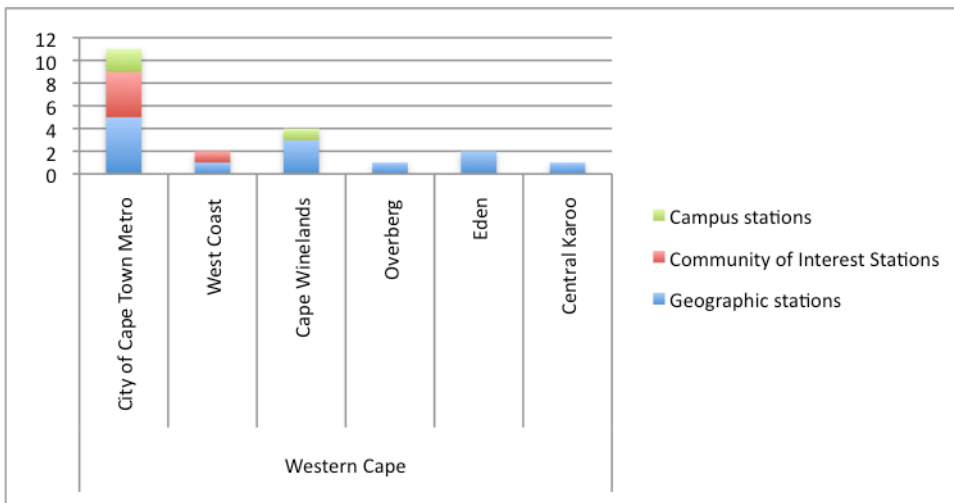
Graph 9: Northern Cape by type and district municipality



Graph 10: North West by type and district municipality



Graph 11: Western Cape by type and district municipality



In 2005, working with the smaller number of community stations licensed at the time, Tleane observed that the bulk of community broadcasters were geographic stations mostly found in black, working class communities and that community of interest stations, by contrast, were largely found in middle class communities – with the exception of a few campus stations. In many ways, the typology of community broadcasting in South Africa reflects the history of the country, with its race and class peculiarities. It also reflects the changing political landscape of the country (Tleane, 2005).

He went on to observe, “Striking is the fact that the urban centres are the most well served in terms of all three tiers of broadcasting. Equally not surprising is the fact that Gauteng and Western Cape also have the highest proportion of community of interest stations. This is not surprising given that these are also the two economic centres of power in South Africa”.

“There is a direct relation between the demographics of the station (black led, working class) and the location (black area reflecting a history of apartheid neglect). Black working class stations are found in townships – often located in buildings that are not of high value or conducive to the nature of work.”

“The post-apartheid establishment has sadly not implemented policies that are robust enough to rollback the contours of apartheid capitalist spatial development. Instead, these are reinforced under the new order. Stations are similarly a mirror of this disappointing development” (Tleane, 2005).

Sadly, this disappointing development remains true even now. The overall examination of the state of the community radio sector in 2012 reveals similar disparities in terms of location; disparities that perpetuate apartheid social engineering.

2.5 Costs of setting up and running a community radio station

The research did not seek to engage with any of the technical specifications related to broadcast equipment but instead to get a general sense of the current costs of equipment that was being supplied to or purchased by community stations. Currently an on-air and production studio costs in the region of R 600,000.00 and a FM transmitter station costs around R 250,000.00. These figures are based on pricing and specifications obtained from B&I Broadcast and Installation Engineering, one of the DoC's partners in the infrastructure rollout programme.

Running costs

The budgets and expenditure of three stations across different geographic settings were examined to see what costs are currently being incurred to run a station.

Station A is located in local in a rural and fairly sparsely populated province. It is in second biggest town (population size and economic) in the province and has been on air for 12 years. It is a thriving, stable station that has been able to establish itself as a success in terms of stable management and financial sustainability.

Station B is located in a rural province but within a town that has large business base (including a number of mining houses). It also attracts a large number of tourists to the area. It has been licensed for four years but work to initiate the station started as early as 1995. It has received a great deal of financial support from the local municipality and is currently finalizing arrangements to be housed by the municipality.

Station C a relatively new station and is located in a small, very rural town in a very rural province with a very small business base and is unlikely to attract huge advertising support. It took about ten years to get its licence and it operated on a special events licence for a while. It has received significant support for its start-up from the local municipality in the form of equipment and infrastructure. While not located in the poorest province in South Africa, it is and most likely will continue to be dependent on donor funding.

Based on the budgets provided, annual costs range between R1 million to R 2 million depending on the scale of operations. Across the board, salaries were the biggest area of expenditure followed by transmission costs.

Of the stations surveyed, only one station had a budget item for governance costs and none made any provision for community participation costs. Two of the stations budgeted for content/research costs as well as newsgathering / research costs and for newspapers and magazines. Of the two, only one budgeted for travel costs to produce news and content.

In terms of operating costs, only one station made provision for SARS costs and copyright costs (SAMRO fees).

2.6 What has emerged over the past 17 years?

2.6.1 Key dimensions of community radio

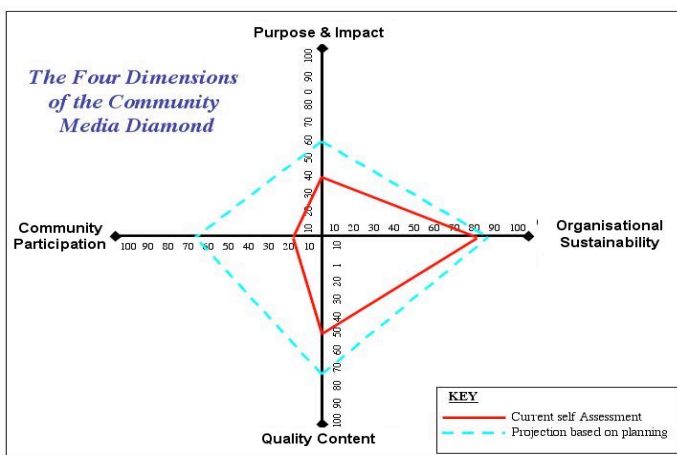
In 2009, AIDC and NCRF developed the Community Media Index (CMI) as a participatory assessment and action-planning tool and piloted it with five Limpopo community radio stations. The purpose of the CMI was to aid community media projects to enhance their reflection, foster greater engagement with their stakeholders and empower projects to 'index' themselves creating benchmarks and goals. It suggests four dimensions of a media project that need to be assessed:

- **Dimension 1 – Purpose and Impact:** This dimension addresses a project's strategic assessment of their environment, the development of a vision and strategic goal, the extent to which this vision informs the project's activities, and the extent to which the project has actualised its vision in the period under review.
- **Dimension 2 – Ownership & Control:** This dimension looks at the degree to which community stakeholders participate at all levels of the project. It reviews the ownership model, participation in management, planning, reporting, reflecting and editorial/programming. This dimension makes an assessment of the extent of the

projects engagement with its Development Eco-System, it looks at stakeholder mapping, partnerships and collaborations.

- **Dimension 3 – Organisational & Financial Sustainability:** This dimension assesses the strength and functionality of an organisation’s systems including governance and decision taking, human resource development, financial management, and critically, the ability of the project to develop and grow different income streams.
- **Dimension 4 – Quality Content:** This dimension assesses the extent to which the project’s editorial/programming meets the information and expression needs of its community. It will assess the editorial/programming in terms of the representation of women and marginal groups in the community, bias towards institutions holding political, social, or economic power, the application of media ethics, accuracy and fairness in reporting, the spread of stories and sources, quality of presentation, and the extent to which the programming upholds and advances the values contained in South African Bill of Rights.

Diagram 1: The four dimensions of the Community Media Index



The next section looks at some of the key issues that have emerged in each of these dimensions to paint a picture of the state of community radio. It also provides some of the views and experiences gleaned from the interviews with stations across the four dimensions. It also includes views related to independence and relationships with government and any perspectives on key issues to be taken up during the policy review process.

2.6.2 Purpose and Impact of community radio

Participants at the SOS/R2K workshop saw the following roles for community radio:

- A mechanism for empowerment;
- Through encouraging dialogue and debate, a tool for changing people’s mindsets and deepening democracy;
- A conduit for information and engagement between role-players (particularly government and communities);
- A platform to ‘tell the truth’ – i.e. a vehicle for transformation and justice;
- A powerful tool for creating access to knowledge and resources and supporting community development – i.e. making positive differences in communities;
- An education, information and entertainment role;
- A role in creating cohesion in society and highlighting heritage and histories of communities – community broadcasters as reflections of communities and provide a ‘pulse’ of the community;
- Provide a space to share experiences and give profile and voice to local and untold stories (particularly those of the less empowered), heroes, musicians, poets, etc.

A key challenge Ismail Veriawa identified was how the station saw itself and whether it saw itself as a driver for social change. Many stations are started with great ambitions but soon the ‘jukebox syndrome comes in’ and stations start cloning commercial stations. He believes it is important to trace where the history of the community radio movement in South Africa and how to ‘translate Jabulani into our lives now’ - stations need to “be 100% committed to social

upliftment'. He points to the huge inequalities and challenges in education in the country at the moment and asks how many stations are currently developing programming to assist in filling this gap.

2.6.3 Ownership and control

"It is your radio station; you must be involved in its running, and you must be able to tell your community station what kind of programming you would like it to broadcast; and to make it truly a community station you ought to be able to communicate with it" This quote from a community activist who attended a Right to Know (R2K) Media Diversity Workshop in July 2011 encapsulates the essence of community broadcasting – a rootedness in the community it serves with community ownership.

Community Media was born out of the struggle for a democratic society expressed in the vision outlined in the Freedom Charter with its first clause: "The People Shall Govern!". This clause refers to four interrelated dimensions of popular democracy: electoral democracy, administrative democracy, constitutional democracy, and participatory democracy. Participatory democracy requires strong institutions outside the state directly controlled by organised communities – institutions that can articulate community perspectives, facilitate democratic processes within the community, and enable the community to engage the state. (Weinberg, 2011)

The emphasis on 'community ownership and control' as a defining criteria for community media in major policy documents (including the Broadcast Act and MDDA Act) bears testimony to the role that South African's envisage this media playing in giving a voice to sections of the population that have been socially and economically marginalized. To enable 'community ownership and control' media projects are – by law – registered as non-profit Section 21 Companies or Trusts and are obliged by their ICASA license agreements to conduct an election of their Boards at a public Annual General Meeting (details of the AGM must be announced on air).

While these conditions are necessary to ensure community ownership and control, alone they are inadequate. In the current socio-economic context the model tends to attract opportunists who imagine that participating in the governance of a station could lead to self-advancement. The community radio sector is littered with anecdotes of people who arrive at AGMs with a bus full of people to secure their election to the Board or a group of friends registering a Trust and secure a radio license in the name of a community. The model has also often led to a high turn over of Board members, resulting in the loss of institutional memory, and generating tensions between Boards and station staff (Weinberg, 2011).

In 2011, R2K received complaints from communities around Theta FM (Orange Farm) and Zibonele indicating that AGMs are not been held. In the case of Zibonele, the report received that the board members were pre-selected and presented to the AGM.

Radio Riverside's primary form of community participation is via listeners clubs; for example, the station has a database of about 500 people (students, people living with HIV/AIDS, organisations, etc.) who form a HIV/AIDS listener club. The station sends them an SMS to remind them to listen in and the feedback the listeners club provides offers useful insights into perceptions and levels of awareness on the issue. The demographics of the listeners clubs vary but the station has a deliberate strategy of encouraging diversity (age, educational levels, socio-economic). Riverside has its offices separate from its studios and chooses to maintain its offices in Upington town so that it is access "people can walk in and out" (Pusoyabone interview, 2012).

The station also hosts a 'Forum' meeting made up of community structures in the area. Member organisations nominate a representative to attend the station's Bi-Annual General Meeting. Any community structure, with the exception of political parties (in accordance with ICASA's regulations) can be a member of the Forum – church groups, NGOs, youth organisations, etc.

Radio Ikwezi hosts an annual Listener Club Christmas party, which brings together between 600-700 people.

Radio Islam enhances its community involvement through community outreach (including communities within a 60Km radius of the station) including an ambulance service for anyone in the greater Johannesburg area and has recently introduced a counseling service.

Ismail Veriawa of Radio Islam believes there is great inconsistency in defining 'community' in the sector and that there many who are involved in governance who are only interested in 'feathering their own nests'. He points to Radio 702, which is a commercial station that has redefined community – through the creation of '702land' and contrasts this to the many 'glorified' community stations that primarily have a commercial interest and are not really rooted in their community.

2.6.4 Organisational and financial sustainability

Despite radio's advantages of being one of the cheapest and accessible mass communications technologies, small stations still struggle to survive. In Southern Africa and elsewhere, many community radio stations operate in situations of dire poverty despite having been set up confident that local needs would ensure community support in the form of volunteering, in-kind support and donations (Simmering & Fairbairn, 2007).

In South Africa, while establishing community media projects conceptualised within the Reconstruction and Development Programme (RDP) paradigm of development they were soon left to fend for themselves as GEAR and an ever-encroaching neo-liberalism took hold. As a result, many media projects take their financial sustainability as their primary strategic impetus. This strategic orientation places projects at the whim of the local and national market place and at risk of political influence.

Jansen (2009) contends "that it is the current neo-liberal political economy that has entrenched a consistent shift by community radio in South Africa away from its principled basis of community ownership and control and communication for development".

A key challenge for the sustainability of community stations in the current regulatory and economic policy environment is that they are dependent on the discretion of advertisers, the limited resources available to the MDDA and Government advertising.

Poor communities faced with high unemployment and lack of access to infrastructure view the sector as providers of income and resources such as gaining access to telephones, fax machines, photocopiers, the Internet, training opportunities and above all, paid work rather than as initiatives needing community support. For example, "the early experiences of community radio projects in South Africa, where volunteers rebelled, staged sit-ins and strikes, stole equipment and CDs, or simply abandoned stations when they realised there was insufficient income to pay salaries, are testimony to this" (Simmering & Fairbairn, 2007)

"Like many other aspects, or facets, of the community radio sector its financial state and ability to remain sustainable is very much shaped by the race and class complexities that make up the country. The sector is therefore a mirror image of the broader society. The overall picture that emerges is that stations that serve richer sections of the society are much better-off compared to those that serve working class communities." (Tleane, 2005)

Most stations are primarily dependent on advertising for their income but are located in communities that have limited consumer power and thus do not represent attractive or lucrative markets to private sector advertisers. Advertising agencies, responsible for the ad-spend of large corporations, perceive community media projects as ineffective vehicles for advertising due to their large number, small footprints, and at times poor administration. The public sector (while the largest contributor to advertising and programme sponsorship) and civil society either fail to realize the importance of communication to their programmes or choose to spend their communication resources in traditional forms of mass media. Inefficient and inadequate financial and administrative systems within community radio stations are also cited as a problem by advertisers.

The dependence on the whims of individuals controlling advertising budgets (both private and government) severely impacts on the editorial independence of media projects as they are loathe to offend those with money and are prepared to broadcast/ publish almost any content that comes with sponsorship. Because of the general under-funding of media projects, they lack the funds to secure and retain the necessary skills and other resources to produce quality programming and facilitate community participation.

The sector is caught between two contrasting perspectives characterised by **open access**; which fulfills the basic functions of community radio and **audience- building**; which refers to the size, character and financial resources needed for community radio sustainability. To qualify for funding, stations need to remain small and have a dynamic relationship with their communities, but to wean themselves from their seed funding, the stations need to expand their broadcast “footprints” and increase their potential advertising revenue” (Teer-Tomaselli & De Villiers, 1998 in Muswede, 2009).

For most of the stations interviewed, the biggest cost drivers were transmission costs and salaries.

Brenda Leonard from Bush Radio sees advertising as the big obstacle to sustainability in the sector and believes ‘the whole industry needs to be changed’ (interview, 2012). Community radio has to fight very hard to make headway with advertisers. She cited the experience of the station recently where they had to wait for a long time for the media buyer to finalise the arrangements despite the client having made the decision to advertise with the station quite quickly.

Some agencies are slow in making payments to stations and this has a huge impact on plans and cash flow. While Leonard thought the proposed advertising centralized system being mooted by the MDDA and GCIS was a good idea; the key challenge she foresaw was that stations would need to be in good standing with SARS, ICASA, etc. and that MDDA should therefore need to look at how it assisted stations to become compliant. The advantage of such a system is that it will allow for monitoring the advertising revenue flowing to community radio.

Some of the strategies Bush Radio is exploring to enhance its financial sustainability is to look at PayPal (though it has its drawbacks), sms donations (though most service providers retain 60% of the income generated) and to host fundraising events like a comedy show. Voice of the Cape hosts a four-day community carnival and about 200 000 people come through the gates.

Bush Radio is an advocate for an annual, standardised grant to be given to community radio stations. Rural stations should get a bigger amount per grant in recognition of the fact that they have less access to advertising possibilities.

The socio-economic conditions of the community surrounding the radio station are a significant variable in a station’s sustainability. Radio Tyberberg was able to raise R 2 million in a week during a fundraising drive. For Radio Islam, donations from the community – which has a significant portion of its members who are quite affluent) has led to the purchase and development of a state-of-the-art building and studio facilities. Bush Radio was able to raise R 100 000 in a recent pledge drive. Leonard believes that communities of interest stations, particularly religious stations, are generally more financially sustainable because there is a big emphasis within the religion that encourages people to give.

Radio Ikwezi is in a very unique and fortunate position of not having to pay rent (and electricity) – the premises it operates from belong to the mission and the station was able to negotiate a lease for a very nominal rate as long as it could prove that it could be financially sustainable. It also pools its Internet usage and costs with two organisations (a school and a local business) in the area. The bulk of its revenue comes from advertising – but it does not sell generic spots; instead it sells programme sponsorship and sells mostly to the big seed companies in the area. It has also received some donor support: OSF-SA provided support for election coverage and the station has received funding from MDDA’s programme production fund to produce programming. While the community currently contributes very little direct financial support to the station, Rice believes they would rally around the station should the need ever arise.

Radio Riverside has about 70% of its income being generated from Government (the station broadcasts all the budget speeches between February and March) and because it has its own Outside Broadcast Unit (OBU), it is able to make syndicated programmes for other stations in the province. It also gets some donor funds: MDDA, the Commonwealth of Learning, UNESCO and the AIDS Foundation of South Africa in the recent past. Radio Riverside gives local businesses or ‘spazas’ a lower rate to advertise on the station.

Its main costs drivers are salaries and SAMRO and telecommunications costs. It undertakes its own transmission because it is cheaper – the station purchased a 500W transmitter twelve years ago and has experienced no problems with it until now. If it had to deal with Sentech, a transmitter with the same output power would cost R 36,000 a month. Pusoyabone believes that self-provisioning in the sector would be a valuable contributor to sustainability and that

support should be directed towards providing for the initial infrastructure. The station shares its mast with the municipality and they are hosted for free on towers owned by the South African National Defence Force (SANDF).

Radio Islam gets about 95% of its income from advertising and there are some months when it does not have enough advertising space to cope with the demand. Veriawa also believes that compliance is crucial for sustainability – record-keeping is important – and compliance is also important for growth so one can measure progress and impact and ‘feel good about what has been achieved’.

Radio Phalaborwa’s biggest costs are salaries and maintenance of studio facilities. It also did not go the Sentech route because it was more expensive and instead received funding from local businesses in the area to purchase studio equipment and a transmitter. It is reliant on advertising agencies like Serongwane, Motswako Media, Media Connection and the NCRF and the GCIS for its revenue. Most local businesses do not see the value of advertising and only about 0.1% of local businesses advertise on the station. It has also received funding from the Foundation for Human Rights to run a campaign on gender-based violence.

Radio NFM is located in an area where there are increasing levels of unemployment due to the closing down of mines in the area. Most of its funding is from the MDDA and its biggest expense is signal distribution. It has done programmes for Government through GCIS (State of the Nation address and budget votes) but has experienced delays in receiving payment for these.

2.6.5 Quality Content

“Despite their challenges, some community media projects have through their programming, news and attention to local language and culture, established themselves as a unique voice in the South African media” (R2K Media Diversity Workshop, 2011).

Media projects have also managed to build and sustain news departments producing numerous daily bulletins – in the case of radio - and reporting local, national, and international events for their audiences. However, the above factors result in weak programming and editorial content. Many community radio stations – broadcasting for many hours a day – resort to music (often America pop) and news bulletins are read off the front pages of the commercial print media. There is also a dependence of the Government Information and Communication Service (GCIS) who provide ready packed news and other content” (Weinberg, 2011).

While stations are required in terms of their license conditions to dedicate a percentage of their programming to national and international developments, there is very little original programming of this type that can creatively link national/ international developments to local impacts or implications. Content sharing is limited with few media projects exchanging content amongst themselves or forming sustainable partnerships with CSOs. Generally, analytical and journalism skills are weak. Few editorial staff have receive formal training in journalism and there is little or no investigative reporting.

The shortage of skills in the sector and the recruitment of skilled people from the sector to more lucrative commercial and public broadcast media impacts negatively on the management and sustainability of projects. There is limited comparative information about various training service providers and about the skill needs of media projects. The absence of comprehensive or systematic needs assessments results in capacity building services being delivered in a piecemeal and ad-hoc basis. Many media projects battle to access and maintain information and communication technologies (ICTs) necessary for effective and enhanced publishing and broadcasting.

The dependence on advertising and government for their income compels community stations to adopt commercial operating models where advertisers and sponsors have an inappropriate influence in programming and stations cannot produce the quality of programming that would serve the developmental needs of their communities or facilitate meaningful community participation that community media requires (Weinberg, 2011).

Jansen (2009), in a study of several community radios around the country found that “a lack of development, deepening and widening poverty in townships and the departure and decline of the radical intelligentsia has caused community radio stations in South Africa to be a sterile imitation of what they ought to be – distinguished only by their size, scope,

locality and formal adherence to broadcast licensing requirements.” Jansen found that the pre-occupation with generating commercial revenue, and dependence on advertising from either commercial or state sources, were not only impacting on the orientation and style of programming, but also deprioritising drawing in the actual community into programme content and direct participation.

Some of the findings that emerged from a study looking at news in community radio undertaken by Kruger (2011) include:

- Only half of the stations studied had a news department of any kind and “It is striking that the geographic community stations ignore international stories completely; not a single international story showed up on our sample. While community stations should focus primarily on local news, ignoring the rest of the world entirely seems surprising.”
- “News on community stations is overwhelmingly lifted from newspapers and websites. In a few cases, the station entered into a formal arrangement for the use of the material: Tuks FM buys the Sapa service, for instance, and a news service called News Pod includes audio clips in return for airtime. But in most cases, material is simply plagiarized.”
- In looking at staff, facilities and resources – the key organisational features that influence the production of news it is clear that organisational challenges are a key factor hampering stations’ ability to fulfill their mandate.
- Most telling is this comment from the former news editor at Alex FM that pointing out that presenters were paid better than news staff were and “Generally, members of news teams were referred to as newsreaders rather than journalists or reporting, and it was clear that reading was their main task.
- Transport is a key challenge – “station-owned transport is rare, and money has to be scrapped together to pay for public transport. Thetha FM news editor, Simon Nwanba said he sometimes used his own money to pay reporters taxi fare.
- “Language places additional demands in terms of time for translation and affect staffing patterns. Kruger also points out that mainstream commercial radio is not strong on news with the exception of 702 and its sister station, Capetalk 567.
- “The most important observation from this research is that the news function at many community stations has atrophied to a simple matter of finding items of news websites, editing them somewhat and reading them on air. Too often, actual reporting does not form part of the picture.”

Radio Riverside reported that 70% of its news was local news; 15% provincial news and the remaining 15% covering national and international news sourced from the Internet. The news team consists of eight people who cover government, health, social development and the local municipality. Crime stories (including the courts and SAPS), emergencies and provincial stories are also covered. Community members come to the station to report service delivery issues and the station provides community announcements. Many of the journalists have provincial networks so are able to cover provincial issues as well. One of the stories the station is currently pursuing is that of a patient at the local hospital who had his wrong leg amputated.

Bush Radio sources most of its national and international news from a new agency (News Flash) and the community contributes stories or leads via phone or sms. Many NGOs and CBOs in the area also release press statements. The station is also finalizing plans to train stringers in different areas of the community who will file a story once a week enabling the station to cover stories from a broader range of the community.

Radio Ikwezi’s programming focuses mainly on agriculture, health, religion and small business. It produces radio dramas in-house. It has two vehicles, which are mainly used to collect news stories around the community. The station is seen as part of the community and is inundated with invitations to 21st birthday parties and matric farewell parties. It believes it is well situated for content and programme development because there are a number of NGOs, hospitals and government departments (like the Department of Agriculture) close by. Listeners also come to the station to report

events and incidents and sometimes reporters go out using a bicycle rather than the station car, which has its logo, to investigate. Rice sees community radio's inability to afford investigative journalists as big challenge for investigative news.

Radio Islam sees itself as the voice of the community and therefore tries to send a reporter out to cover events in the immediate area. It also accesses stories of relevance from international sources like Al-Jazeera and always ensures that it credits its sources.

Radio Phalaborwa hosts an annual Programme Summit where stakeholders and the community decide what issues the station should address. It has a telephone 'hotline' number where listeners can submit news leads. The most serious challenge it faces in gathering news stories is the lack of transport – the station has a 100km radius broadcast footprint and no station car. It has close relations with the local municipality, hospitals and community centres in the area and it goes to local events. The station produces its own radio dramas, features and educational programmes.

Radio NFM plays an important role in keeping the Nama language alive in the area and it has a strong religious component (Christian) to its programming. It sources national and international news through a news agency (News Flash) and has built up contacts in the area. Members of listeners clubs also provide news leads.

2.7 Future policy directions

Bush Radio would like to see the whole environment in which community radio operates assessed and changes made where needed – this should include the licensing process, SAMRO (also a huge financial burden for many stations; in the case of Bush Radio, 70% of the music it plays is local music) and measuring the functioning and effectiveness of ICASA, the DoC and MDDA.

The station has also experienced frustrations with MDDA where documents were requested for an application that was submitted three years ago. Stations were often pressurized to submit documents and then experienced long delays in getting any responses or progress on the application. Reporting requirements were also onerous – for a small station with only two or three full-time staff managing all the various reporting and monitoring requirements can be very challenging.

The recent visit to Bush Radio by the Portfolio Committee and the MDDA was welcomed by the station as it provided an opportunity to raise key policy issues with legislators and legislators got first-hand experience of the conditions and context within which community radio operates in. The contribution by the DoC towards a portion of the station's signal distribution costs was also highly valued.

Leonard's view was that the licensing process should also pick up on ownership and control issues and to evaluate whether these are 'window-dressing' and ICASA should be more vigilant in assessing applications. For example, a station was recently licensed as a community of interest station and is registered as a family trust, with the trustees based in Johannesburg and Cape Town.

Perceptions around favouritism within MDDA and ICASA also need to be addressed.

Pusoyabone believes it is important for community radio to feel safe in terms of transmission costs; equipment and basic running costs and that support to the sector should be in the form of a grant (annual or monthly).

2.8 Challenges

Radio Riverside's biggest challenge is the number of computers available – it currently has eight people using two computers – and that its office space is too small. The fact that its offices and studios are not located in the same place results in high transport and has management challenges (the Programme Manager is located in one office and the presenters are elsewhere). Also, arranging community meetings was identified as a challenge.

Peter Rice sees funding broadly as the main dilemma for community radio and believes that the danger is most community stations will become more commercial in orientation to keep afloat.

Radio NFM finds it challenging having to compete with stations that have been operating for a much longer in the province and feels that it is sometimes 'crowded out' by older stations. The fact that it is quite far from Kimberley (the economic hub of the province) was also cited as a challenge.

Radio Phalaborwa sees government support for content development as important as is the need to promote more diversity in the media. And, all tiers of Government, from national to local, must be committed to supporting community stations.

2.9 The influence of politics and relationships with Government

Brenda Leonard believes that community stations being housed in municipal buildings may not necessarily pose a huge threat to the independence of community media as often the interface is with officials. Many crèches and NGOs in the Western Cape receive such assistance and Radio Zibonele receives subsidised housing for their premises from the municipality.

In her experience, the biggest political pressure is experienced during elections; for example, the Democratic Alliance (DA) has complained about having to debate with small political parties. The DA's media arm is very organised and they have readily available press releases and sound bites, which makes it easier to get their news out. The other big pressure is for free airtime – national government and local officials apply pressure on the station for free airtime.

Radio Riverside hosts a bi-weekly 'From the Boardroom of the Municipality' programme that addresses issues of service delivery – water, electricity, IDPs and promotes the services of the municipality. In addition, the municipality pays for other promotional programmes on municipal services.

Peter Rice of Radio Ikwezi reported on a good relationship with their local municipality. A regular feature is 'Mayor's Day' where the Mayors from four different municipalities come to the station and run an open line. Initially, mayors were afraid as they were unsure what to expect; however the station put in a great deal of hard work in working with them and now they are happy to come regularly and the community has the benefit of getting answer about basic issues. It has been so successful that the mayors' offices budget for the programme is planned for and paid six months in advance.

Sello Lepedi of Radio Phalaborwa believes that municipalities are sometimes afraid of community radio because of fears that they will be criticized for non-delivery. Once they see the benefits of using the station to promote the services of the municipality and to listen to people's view, they become more relaxed.

FUNDING COMMUNITY RADIO

The only real way to support public media is through a public funding model – one that recognizes this form of media cannot and should not be caught in the midst of the tug-of-war of both the vagaries of the market and potential for political pressure. South Africa is a leader, on the continent and compared to many other part of the world, in terms of support for community media.

A key concern around funding is independence: “regardless of who owns them, community media should be independent of government, donors, advertisers and other institutions. This does not mean that they do not have relationships with these institutions, or that they cannot receive funding from them. But this relationship must be transparent and cannot compromise the station’s independence. When money is involved, there is always the potential for independence to be compromised. Therefore, funding relationships need to be governed by clear and transparent agreements that protect the non-partisan nature of service broadcasters provide to their communities. These agreements should operate within the boundaries defined by the law, and the constitution or guiding principles of the station” (Girard 2007 in Lush and Urgiotti, 2012)

There are increasingly questions to be raised in South Africa about how public institutions in South Africa view their mandate and how the ruling party’s cadreship development strategy impacts on the independence (perceived or otherwise) and funding on these institutions. This is no less true of institutions in the community media sector.

This section looks at some of the financial support flowing to community radio and pays some attention to the MDDA as the biggest source of support; particularly financial.

3.1 MDDA

3.1.1 History and Background

MDDA was established to create an enabling environment for media development and diversity that is conducive to public discourse and which reflects the needs and aspirations of all South Africans. Regulations also spelt out how the funding should be split:

- 60% for community media
- 25% for small commercial media
- 5% for research and training
- 10% unallocated/other

MDDA commenced operations under the directorship of Libby Lloyd and and a small staff of 7. Its budget was substantially less than what was identified in the initial needs analysis, which was R500m over five years or R100m a year. The negotiations between government and industry resulted in an industry contribution of a meager R10m a year from industry (broadcast and print) and R7m.

The establishment of the Media Development and Diversity Agency (MDDA) in 2005 has created has created a conduit to facilitate access to state and private sector resources for media projects. However the MDDA was born within the frame of neo-liberal state policy and the Agency remains woefully under funded (unable to fund core running costs of media projects). The composition of its Board - representatives of the private media sector and government - and increasing moves to position itself as state owned entity raise crucial questions about its independence and autonomy. While the MDDA remains a path-breaking initiative for a developing country with limited resources, the key challenge is whether the compromises necessitated by the partnership will allow it to pursue the developmental objectives it has set for itself.(Pillay, 2003).

Pillay went on to pose the questions: “Do partnerships involving the corporate world in developmental projects inevitably mean compromising the social goals of the project, or can genuine win– win partnerships be formed between

governments, the corporate sector, and civil society? These questions are central to the evolving partnership between various arms of the South African government, a range of commercial media companies, and the community media sector, to promote an often neglected developmental objective: the media needs of poor and marginalized communities, in the interests of media diversity, access to information, and freedom of expression.

There are a number of proposals to expand the mandate and resources of the MDDA. For example, the PSB proposes that MDDA fund all tiers of broadcasting and the envisaged role it would play contained in the Local Content strategy. In addition, the ANC’s 2012 Media Policy that will be adopted in Mangaung at its national elective Conference presents another role for the MDDA – a merger between USAASA (a very weak and fragile state owned entity that has seen the similar turbulence as the SABC in terms of high staff turnover, allegations of fraud, mismanagement, etc.).

Eight years since the MDDA was first established, these are the questions that need to move to the forefront of the research agenda before we can talk about what additional roles and responsibilities should be taken on.

3.1.2 It’s resources

The Electronic Communication Act 36 of 2005 brought “alignment between broadcasting and telecommunications” (MDDA, 2008) and shifted the funding parameters of the MDDA. In its 2010/2011 annual report, the Agency reported that it has grown from “a R 10m operation in 2003/4 to a R44m entity”. Until the ECA kicked in, Government was the biggest contributor to the MDDA and still remains a significant source of funding for the Agency.

In terms of the Act, all licensees have to pay a percentage of their annual turnover to the Universal Service and Access Fund (USAF); with ICASA determining the percentage. The Act also provides for broadcasters’ contributions to the MDDA to be offset against this prescribed annual contribution to the USAF. Since this took effect in the 2009-2010 financial year, Capricorn FM, Kaya FM, YFM, Eastcoast Radio, Heart FM, Igagasi FM, OFM, Algoa FM have all started contributing to the MDDA. However, the implications of this levy for community broadcasters are problematic and the sector is starting to tackle it with ICASA and the DoC.

Table: Income and Expenditure trends

Income and Expenditure trends						
01 April 2003 to 31 March 2012						
Year	Government	Print Media	Broadcast Media	DoC	Other Income	Total Income
2003/04	10 000 000	-	-	-	-	10 000 000
2004/05	7 000 000	4 800 000	5 100 000	-	216 000	17 116 000
2005/06	7 000 000	4 800 000	5 300 000	-	53 000	17 153 000
2006/07	9 120 000	4 800 000	5 300 000	-	567 000	19 787 000
2007/08	11 991 000	4 800 000	5 300 000	-	1 177 000	23 268 000
2008/09	14 558 000	4 800 000	5 300 000	20 000 000	1 167 000	45 825 000
2009/10	16 592 000	4 800 000	17 862 000	-	794 000	40 048 000
2010/11	17 265 000	4 800 000	19 665 000	-	414 000	42 144 000
2011/12 (budget)	19 115 000	4 800 000	13 306 687	-	6 702 604	43 924 291

(Source: MDDA Annual report, 2010/2011)

Table: Value of applications received from MDDA versus amount approved

Year	Value of applications – community radio	Amount approved
April 2006 – March 2007	R 12 846 739.00	R 7 756 138.00
April 2007 – March 2008	R 27 283 322.00	R 12 314 632.00
April 2008 – March 2009		
April 2009 – March 2010	R 10 618 891.00	R 9 086 665.00
April 2010 – March 2011		
April 2011 – January 2012	R 37 137 743.00	R 24 674 278.00

(Source: MDDA Project Tracking System reports from Project Administrator)

Kate Skinner (2007) outlines the constraints facing the Agency in meeting its mandate - its limited mandate and ambit as a result of the compromises reached during negotiations to get up the Agency) and its small budget and funding base, which have served to limit ‘its capacity to impact on media diversity in South Africa.’

Skinner also outlines the constraints that were identified or emerged through her research on the MDDA:

- The definition of community media is contested;
- The original definitions of ‘diversity’ and ‘development’ have been pared down;
- The MDDA’s mandate has been constrained to focus primarily on the small media sector;
- There is no seat reserved for community media by law
- MDDA has no regulatory powers and no power to make binding recommendations;
- Funding from the public and private sector has been limited;
- Statutory levies are not place (This is now in place with the coming into effect of the ECA).

Year	Value of applications – community radio	Amount approved
April 2006 – March 2007	R 12 846 739.00	R 7 756 138.00
April 2007 – March 2008	R 27 283 322.00	R 12 314 632.00
April 2009 – March 2010	R 10 618 891.00	R 9 086 665.00
April 2011 – January 2012	R 37 137 743.00	R 24 674 278.00

(Source: MDDA Project Tracking System reports)

3.1.3 MDDA’s performance

In its 2011/2010 Annual Report, it reported that it had:

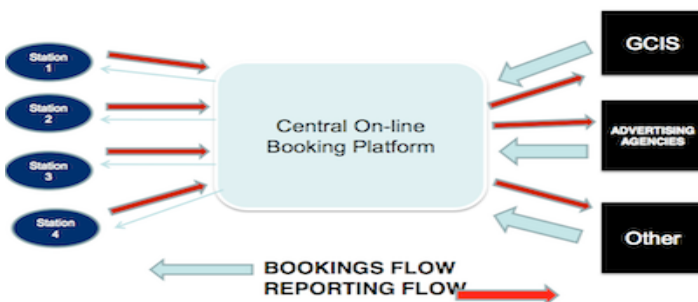
- Cumulatively, funded just over 343 projects;⁵
- Awarded grants amounting to around R128.8m;
- Trained 473 people working in community and small media projects from April 2010 to March 2011; and
- Ensured some form of media access for communities in every district municipality and that an enabling environment for media growth and development is created all over South Africa.

The Agency has consistently achieved unqualified audits, a notable achievement given the current state of similar institutions.

3.2 Advertising

In early 2012, the MDDA and GCIS announced the development and implementation of an online booking system for community and small media that would ensure that GCIS adspend would reach these sectors.

Diagram: MDDA’s online advertising platform⁶



⁵ includes print, research and training and other projects.

⁶ This diagrammatic representation of how the online platform will work was sourced from <http://themediainline.co.za/2012/02/mdda-gets-green-light-for-community-media-ad-project/>

This came on the back of oversight visits to community media initiatives in Eastern Cape, Kwa-Zulu Natal, Free State, Western Cape and Northern Cape by the Portfolio Committee on Communications (PCC) where one of the main complaints raised was the difficulty community radio experienced in terms of advertising revenue.

MDDA has also been investigating how much advertising and sponsorship revenue has been received by the community sector through GCIS and private sector agencies like The Media Connection, ABC Ulwazi, Agile Media, Motswako Media and Serongwanyane, etc. because “these figures are an important measure of the tradable value of the sector by revenue and an essential indicator of the sector’s trading partners” (2011). Some of the figures from the Agency’s 2010/2011 and 2008/2009 annual reports provide the following payments to the community radio sector:

	2007	2008	2009	2010	2011
Media Connection	10 554 546	12 358 928	17 920 288	17 735 416	18 041 602
Agile Media			Slightly over 500 000 00	Just under 5000 000	Slightly over 200 000
ABC Ulwazi					1 496 500
Serongwanyane Technologies	1 455 460	948 730	453 130		
Motswako Media	1 733 925	3 885 671	1 418 244		
Motswako Media	7 533 838	6 817 494			

The MDDA 2008/2009 Annual Report records that community radio received more than R 117m as advertising revenue in the period from 2004-2009 and that this amount is based on the information from three companies.

An article by Trish Guildford in a recent edition⁷ of The Media Magazine, “Does community radio get the support it deserves” provides some information on levels of Ad spend

Station	2010 Ad spend	2011 Ad spend
Bush FM	R790 899	R1 168 958
Jozi FM	R5 196 445	R22 274 071
North West FM	R3 128 092	R21 134 001
Pulpit FM	R1 299 299	R15 030 832
Tygerberg FM	R879 104	R1 919 495
VOC FM	R432 610	R1 006 150

Source: AdDynamix

Guildford argues that community radio stations are getting their fair share of advertising support based on RAMS figures and the Ad spend figures above and suggests that the question to be asked is why more advertisers don’t use community radio stations. Some of the reasons she puts forward is that there are that it is easier to work with regional stations (6 as opposed to many community stations); that there needs to be better awareness (‘hearing, seeing and knowing’) of community radio stations and that professionalism, honesty and accountability are key (the importance of scheduling, access to logs and tracking systems to confirm that the commercials have been broadcast). Inefficient and inadequate systems and administration at community radio stations are often cited as a significant obstacle.

3.3 Other sources of funding and support

3.3.1 The Department of Communications

This research report has not quantified DoC support to the community broadcast sector, but it has been a sizeable contribution over the years. DoC support has consisted of three components: subsidizing the signal distribution costs of community radio, the provision of infrastructure and content production costs (administered by the MDDA since 2008).

⁷ April 2012

However, DoC support has been fraught with problems – long delays in the rollout of infrastructure have been a source of frustration for a long time. At the SOS/R2K workshop, a station based in the Free State reported that the DoC refused to give them equipment unless they moved into the offices of the municipality.

During the interviews, a respondent felt that the DOC was doing very little currently to bolster the sector and that the process of acquiring support from the Department was ‘tiring’. Another respondent said that the Department was very hard to access for ordinary people – ‘you cannot contact anyone at the Department unless you have a business card’.

One respondent expressed a view that the Department was providing ‘equipment that is overpriced’ and another felt that the Department was providing equipment that was ‘too sophisticated’ and described it as ‘providing Porsche engines to VW drivers’. An example was cited a situation where the DoC provided a radio station in Gauteng with production studios worth around R 2.4 million and half the equipment was stolen with a few months.”

In some cases, some of the equipment provided is apparently obsolete after two years and in other cases there were software compatibility problems. Once again, this is an area warranting more research and analysis.

3.3.2 Government Communication and Information System (GCIS)

This list does not give a breakdown of many stations were involved or the amount paid to each station but it does provide some indication of which national departments have been spending an allocation of their budget on reaching community radio and their listeners.

Table: Government Communication and Information System (GCIS) advertising on community radio

Client name	Total amount
GCIS SONA Programmes	R 3 114 698.99
Marketing outsourced programmes	R 2 197 321.32
NC Premier’s office	R 72 747.51
KZN Premier’s office	R 932 287.00
Mpumalanga Premier’s office	R 53 209.86
WC Local Government	R 44 500.00
Environmental Affairs	R 164 341.13
Arts & Culture	R 188 960.20
Rural Development	R 451 000.00
NYDA	R 198 840.00
Science & Technology	R 267 107.00
Economic Development	R 23 764.00
Water Affairs	R 195 953.00
State Security	R 152 840.00
Stats SA	R 426 520.00
SANAC	R 224 610.00
Department of Labour	R 165 709.00
Social Development	R 240 000.00
Justice Department	R 190 000.00
GRAND TOTAL	R 9 138 700.21 ⁸

(Source: MDDA Annual Report, 2010/2011)

3.3.3 NGOs

⁸ NB: This amount is down by R 748.585.00 compared to last year’s figures; this could be attributed to the fact that GCIS radio has been engaging the Community Radio Stations directly. The amount spent by the departments is reduced considerably because there has been very little fee to service providers.

A number of NGOs and development agencies develop content (often in partnership with stations) and also sometimes pay stations a small fee to broadcast. Again, there has been no real monitoring and quantification of this contribution to the community radio sector.

3.4 More research

While not exhaustive, the figures show that much more research needs to be undertaken to understand what resources are flowing to community radio and more importantly, how it is being used.

FINDING A VOICE – WHAT IS THE WAY FORWARD?

“Community broadcasters must not only have resources to stay on-air, they must also have resources to: ensure professional journalism; enable the creation of quality content relevant to the needs of their communities and importantly, community media should have access to sufficient resources to produce programming and facilitate participatory processes that ensure meaningful freedom of expression, access to information and community ownership and control of projects”.

What emerges most clearly from the research is the need for more in-depth examination of the sector – the sector has grown to a significant size with a great deal of variation in levels of governance and sustainability and impact. But the time has come to ask come hard and difficult questions about the state of community radio - What does it mean that the richest province in the country has the largest number of community stations (beyond just frequency considerations)? What does it mean that in each province, the greatest concentration of community radio stations are in the urban centres? What does it mean when a radio station generates substantial advertising revenue and yet does not seem to have a rootedness in its community? How is this income used? Is it time to migrate some community radio stations to small commercial radio given the levels of revenue they generate and should be we looking at going back to the basics of what it means to be a community station?

The most crucial question that needs to be addressed is the extent to which community radio is a distinct tier of broadcasting; most particularly in terms of real and meaningful community participation, ownership and control, content and programming. Such an assessment must address the central question – to what extent are community radio stations fulfilling their key mandate as the voice of the voiceless? This means a greater analysis of the content that is being produced.

Much emphasis has been placed over the past 17 years of what is happening inside the station – and given the many challenges that still remain in this regard; this work must continue and be strengthened. But the lens now has to shift – to what is happening around the station – how are communities actually participating? To what extent have communities been able to exercise ownership and control over their community stations? This needs to also take into account class, political and power dynamics within communities.

And beyond this, at the core of the assessment must be the extent to which community stations have been able to reach out to a broad cross-section of the community and accommodate diversity of views and a determination of the extent to which communities have been able to exert real and meaningful participation, ownership and control or stations have been ‘captured’ by a small group in a community.

Given the growing anger and frustration amongst South Africans seen in the increasing rise in service delivery protests where the biggest issue is people’s sense of not being heard or having a voice, the question must be asked about the role community radio is playing in providing a platform for discussion, debate and dialogue.

Many of the stations surveyed report having good relationships with municipalities and did not raise any alarms about political interference. But one must recognize that there are many vested interests at station level to maintain the status quo – politically and economically. The limited figures presented in the funding section shows that money is flowing into the sector and some stations are doing very well financially; which also means there are individuals who are also doing well. Politically, there are also vested interests in a weak and fragile sector

More research needs to be undertaken to understand the resource flows into community radio and how it is being used and also to see what impact this has had on content. There is also a serious information gap about community broadcasting, much of which is in the public interest – MDDA’s website seems not be updated very regularly since there are no new decisions documents posted since the 2008-2009 financial year; ICASA’s website provides mostly information about processes and application dates, mainly focusing on the telecommunications and very community radio websites have annual report information. There should a campaign to ensure public institutions are more proactive about providing information, particularly as these involve public funding.

The research reaffirms the need for a comprehensive overview policy overview given the wide range of changes the DoC has been attempting to effect through various policy amendments and new pieces of legislation. There are a number of key policy issues that have emerged that need to be considered more carefully for both their intended and unintended consequences – for example, the ECA’s changes to the licensing regime and that there seems to be a worrying trend in proposed legislation seeking to centralize power in the Minister.

It is hoped that the research is useful in identifying what gaps exist and serves as a lobbying and advocacy tool for generate support to understand the sector better. It will also hopefully also serve to strengthen of the resolve of the community broadcasting sector, community media activists and broader civil society to ensure that the promised overhaul of the broadcasting policy landscape is implemented by the Department of Communications and is broad ranging in its engagement.

In terms of policy and the much anticipated policy review process it is crucial to monitor and analyse what the implications are for community broadcasters. What is striking is how little the voice of community radio is heard. While is not surprising given the current incapacity of the NCRF, the real danger is that many stations are have no idea of what the proposals are and have not thought the implications for their running and functioning because they are too busy focusing on the day-to-day demands of running a station.

Given the realities of location and the fact that apartheid spatial geography as not been dismantled and the current neo-liberal framework shaping our policies at the moment, the success and sustainability of a station is inextricably tied to the environment it is located in – this entrenches race and class divisions – the implications of this must be taken up at policy level.

Libby Lloyd outlines the following principles for public broadcast funding that are equally applicable to community radio: must be predictive to enable planning; protected from perceptions of political interference, levels of funding must be durable and justifiable, transparent and linked to public value.

Other research points to the fact that significant groups are still under-represented or un-represented in the media. These include women, youth and children, the LGBTI community, labour among others. The policy review process will need to look at this more carefully.

The Community Media Index is a useful tool for analysing key elements of community radio and if rolled-out beyond the initial pilot stage could provide invaluable insights into the nuances of community radio and at the same time, provide a worthwhile reflection for the station itself and the community it serves. AIDC and FXI have submitted a proposal to the MDDA for funding the rollout of the Index. A more thorough examination of the content and programming on community radio needs to be undertaken.

In terms of the MDDA, the study commissioned by OSF-SA looking at key institutions needs to be updated with a specific focus on measuring impact. A key measure of MDDA’s ability to meet its mandate will be an assessment to which it contributes to diversity – beyond language – and is able to support projects that are critical of government and government policy. MDDA should also be lobbied to ensure that it prioritises funding for programming, news and current affairs to enable stations to develop their news and investigative journalism.

Civil society needs to continue to campaign for, amongst others:

- Popularising the principles of community broadcasting;
- Taking community radio back to the people – mobilising communities to understand their rights over their stations
- Ensuring the independence of community media from all vested interests;
- Minimum quotas for community involvement in content production; and
- Quotas for local content that are clearly defined (particularly in the licensing process itself)

Depending on the outcome of the Ministerial Policy Review process, a new regulatory environment will either be full of opportunity or threats for community media. Creating spaces for dialogue, filling key information and research gaps and tracking and inputting into policy debates will and should remain the focus for the sector for the next year.

The review process potentially represents a significant overhaul of the policy architecture governing broadcasting in South Africa. Given that the community broadcast sector is amongst the most under-researched and misunderstood development sectors in South Africa, this policy review process comes at a very opportune moment as it provides the community broadcast sector the opportunity to grapple with a number of key challenges – both in terms of the structure, governance and management of stations as well as issues related to policy and the enabling environment

If a new policy framework is indeed going to be created it must build on the lessons accrued from 17 years of community broadcasting and not on a superficial understanding of the challenges, obstacles and opportunities.

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INTERVIEWS

Person	Organisation
Brenda Leonard	Bush Radio
Brunhild Strauss	Namaqualand FM
Ismail Veriava	Radio Islam
Dr. Last Moyo	Wits Media Studies
Libby Lloyd	Consultant and former IBA councillor
Lumko Mtimde	MDDA
Nkopane Maphiri	MDDA
Peter Rice	Khwezi Radio
Russel Jones and Jan Lynzaad	B&I Broadcast and Installation Engineering
Sello Lepedi	Radio Phalaborwa
Thabang Pusoyabone	Radio Riverside