LOCAL RADIO – AN ENDANGERED SPECIES? THE POLISH CASE

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ABSTRACT: A great majority of broadcasters in Poland have local licences. However, it does not mean they play roles typical of local radio. Similarly to other countries the networking process has its negative impact on this sector. Networking leads to unification of the programme and a significant reduction of the local content. What is more, there is no fully recognized third sector which could be a supplement to commercial local broadcasting. In this paper special attention is paid to public and community stations as providers of localness disappearing from the airwaves. The authors, taking into account global trends concerning these two sectors, try to analyse what the chances and the limitations of the development of local radio in Poland within these two sectors are. This analysis is based on official documents, results of public consultations regarding the third sector of broadcasting as well as observations of the functioning of local public radio made by one of the authors working as the Chairman of the Board of the Polish Radio. However, the authors would also like to characterize the current situation of independent local broadcasting in Poland as a whole, specify what the main obstacles in local broadcasting development are, speculate what can be done to improve the situation of this sector.

KEYWORDS: radio, local radio, community radio, and media in Poland
INTRODUCTION

There is a growing tendency around the world of networking local radios and then having them overtaken by big media groups. Such an activity is more profitable than running a single, small local station. However, such a process has a negative impact on the ‘locality’ of broadcasters. Taking advantage of the fact of having a network, such local radios often reduce the local content and broadcast several universal programmes for all members of the network. Also, the local content itself is often standardized and very similar in every station. What is more, such networks are often run by foreign concerns, which are far from the local problems and needs of local communities. It is worth stressing that when we are talking about local radio we should think about locality in the broader context. In many authors’ opinions, it is not only the ‘local content’ that is a factor of locality in the station. What seems to be especially important is also the way this local content is produced. As Hugh Chignell underlined, “Radio localism refers to the degree to which a station is locally sourced and reflects the needs, interests and culture of the local community” (Chignell, 2009: 132). This idea is also supported by Michelle Ndiaye Ntab, who stated that “Local content is material conceptualized, produced and packaged by people using their own instruments (languages, values, beliefs)” (Ndiaye Ntab, 2004). Should we be surprised that the commercial sector is interested in maximizing benefits from its activity? Of course not. This is one of the key features which constitutes a commercial sector - such media are run for profit.

However, local media also have other, non-economic goals to fulfil. As Michelle Ndiaye Ntab underlines, local content is a source of identity and development, and it enables cultures to flourish. More importantly, it “provides the communities with the relevant information necessary for their development” (Ndiaye Ntab, 2004). The relation between the condition of local media and the local democracy was well described by Jerzy Jurecki, the chief editor of one of the bestsellers in the local press market in Poland entitled ‘Tygodnik Podhalański’:

Local press is a foundation of local democracy. The control of local government and public money – these are our...
Local media reflect, to some extent, the condition of democracy. In the societies really active in their communities, local media have a better environment for development; more people are interested in creating such media and there are more consumers interested in local issues. But it also works the other way around. Because of having local media, the community at the local level works better. These are some of the reasons why locally originated and locally sourced media should be protected. What is worth stressing, such media may exist not only within the commercial sector but also the public and community ones which are not so much commercially driven.

THE HISTORY OF LOCAL BROADCASTING

The beginnings of radio are closely related to local broadcasting. KDKA from Pittsburgh in 1920 – often reported as the first radio station in the world - was definitely a local station. It had a 100-watt transmitter and a range of less than 40 miles (Chignell, 2009: 131). The growth of radio networks in the USA and a centralized model of broadcasting in Europe caused a decrease in localness in radio. European broadcasting in the late 70s and early 80s was marked by two contradictory dimensions: on the one hand, the planned development at the European level of cross-border broadcasting using new technologies, and on the other hand, the explosion, sometimes anarchic, sometimes controlled, at the local and regional level of an ‘alternative’ approach to programming (Vittet-Philippe and Crookes, 1986: 1). There were different groups involved in the local radio movement: local communities, minorities, students, volunteers, trade unions, but first of all were the young people who did not accept the state monopoly system. (Vittet-Philippe and Crookes, 1986: 14). They were fighting for a radio close to its audience, dealing with
important problems of the community. Local radio in Europe had to struggle to emerge.

The situation looked completely different in the USA, where local radio had been present from the very beginning. In the USA, the community radio movement started in the late 60s and found its identity in radical opposition to the values of commercialism and the wasteland of market-dominated radio (Vittet-Philippe and Crookes, 1986: 14). In Europe, ‘free radio’ and local radio in the mid-70s and early 80s sought to establish themselves mainly against politically-controlled or establishment-dominated public service monopolies or commercial/public service duopolies (Vittet-Philippe and Crookes, 1986: 14).

In the late 70s and early 80s, several non-public radio stations were founded. From this time, radio in Europe stopped being a national, centralized, public service or government controlled monopoly. For example, the beginnings of local radio in Britain date back to 1967, when local public radio stations were established, but the true change in the broadcasting landscape of Great Britain was connected with the introduction of commercial local radio in 1973 (Chignell, 2009: 132).

The appearance of radio in Europe had far-reaching consequences. Radio started to be an active element in regional development as a ‘region-building’ tool in traditional cultural terms (regional awareness, cultural and linguistic identity) but also in terms of economy (provision of jobs, sensitization of the public to communication technologies, dynamization of local markets, etc.). Local radio strived to introduce a degree of ‘horizontality’. It strived to multiply opportunities of access (Vittet-Philippe and Crookes, 1986: 11). Vittet-Philippe and Crookes call local radio a ‘prime mover’ of the communication system in the late 70s and early 80s (Vittet-Philippe and Crookes, 1986: 3).

But paradoxically local radio in Europe soon became endangered mainly because of the rapid development of commercial radio and the process of networking. In many countries, no more than 10 years after starting such initiatives, local radio was downgraded to a supporting role or even became endangered by extinction. Local stations started to undergo such processes as professionalization, network-

In Chignell’s opinion, The Broadcasting Act 1990 (UK) and the Telecommunications Act 1996 (USA) had devastating effects on the localism of the radio stations, allowing them to remain ‘local’ in name only (Chignell, 2009: 133). This phenomenon is well described by David Hendy in his book *Radio in the Global Age*:

> Each station, or brand station, will present itself as unique, through its particular arrangements of records, jingles, speech, weather reports and news bulletins, in a set running order that differs from rival stations. But the basic ingredients will remain the same: the same records, the same presenter idioms, the same sources of news, arranged slightly differently but with broadly the same concern for pace and flow and the rhythms of daily life – news on the hour, traffic updates every 20 minutes, and so on. Even the jingles, which inevitably use a different melodic hook and catchphrase, will probably adopt the same production ‘feel’ (…) In this view, interactivity and personal choice in the radio stations we select become rather meaningless concepts, since there is little that is fundamentally different (2000: 65).

The process of disappearance of local content from the airwaves continues and is raised not only by media experts but also journalists from the popular press. In February, 2005, in *Die Zeit*, the study about the condition of radio in Germany, *Rettet das Radio* was published. Its author, Ulrich Stock, reported that depending on the region, in Germany it is possible to find on a radio set about 30 various radio stations, but they mostly broadcast a programme he called Dudelsupe (Stock, 2005). It is also a scheme well-known on Polish air: weather forecast, news about traffic jams and information about awards in radio contests. Beside this, music prevails. Krystyna Lubelska, in her article published in Polityka in 2005 entitled *Usta milczą,*
Media Transformations

gra muzyka, underlined that spoken word programmes are disappearing from Polish air (Lubelska, 2005). As a rule, commercial radio stations dedicate at most 3-4 minutes per hour to ‘the spoken word’.

Facing a global tendency of local commercial radio becoming less and less local (in terms of ownership, content, mission etc.) local public media and the still growing community media sector remain the mainstay of localness.

LOCAL PUBLIC RADIO AROUND THE WORLD

According to analysts of McKinsey (PSB around the world, 1999), in spite of many unfavourable, or even alarmist, predictions formulated a few years ago, many public broadcasters have adapted quite well to the new market situation. One of the most important factors of their success was the reinforcement of the meaning of the public offer of the program of own local stations (regional) – this applies to the largest extent to Great Britain, Germany and Sweden.

In Sweden, the development of public regional radio was connected with the programme of decentralization of the country. Only in 1987, however, the public provider of three nationwide channels, Sveriges Radio (SR), decided to start local broadcasting stations, working under the common name of SR4 (Nordstrom, 2010: 89). 24 regions of broadcasting were sectioned in the whole country, and the whole venture, although it was very expensive, turned out to be meeting the audience’s needs connected to the locality of media. During the week, SR4 broadcasts local programmes, while at the weekends – common programmes spread from Stockholm. In Germany, the structure of radio and public television corresponds to the federalist structure of the country. In Great Britain, where there are 44 local public stations, the structure of a local public radio was determined by the cultural and linguistic diversification of Great Britain, as well as the process of decentralization of the BBC itself. Local stations emerged in Great Britain in 1967, 5 years after the Pilkington Committee Report (Husband, Chouhan, 1985: 282). Regardless, there are still regional stations present in Great Britain: Radio Scotland, Radio Wales, Radio Cymru, Radio Ulster, and local stations rendering services of the opt-out type in Scotland, Wales and Ulster.
The rule of maintaining pluralism in the media is the guarantee of the basic rights of a democratic country – freedom of speech and information access. In the accomplishment of this goal, the role of the media is not to be underestimated. In the European grounds, this dependency is underlined by the statements of the European Court of Human Rights, interpreting the art. Ten of the European Convention of Human and Citizens Rights, as well as the series of union documents, among them the recommendation no. R(99)1 of the Committee of Ministers of the European Council, define the term of pluralism in media and pay attention to the resources promoting pluralism in media (Council of Europe Publishing, 2007). Essential, especially here, would be the cultural aspect of pluralism and emphasizing the necessity to present in the media the cultural variety of society, especially on the regional and local level, where it is much easier to break the rules of pluralism.

With the phenomenon of pluralism there are connected two other items, constituting a peculiar opposition. On one side the concentration of the media and on the other, as its opposite – diversity of the media and its contents.

Apart from the proper number of subjects on the market, diversity is most important in order to maintain pluralism. To reach this goal, the role of public and social broadcasters, or environmental ones, is essential. What is crucial for maintaining pluralism on the regional and local markets is the concession politics which supports the protection of regional and local media. These politics also includes the rules concerning the access of national and ethnical minorities to the media and the protection of regional languages.

Hence in France, which does not run any active politics towards minorities, pointing to the rules lying at the basis of the republic, Radio France is obliged to promote regional languages (Kuhn, 1995: 153). In Germany, where the federal constitution guarantees the freedom of speech and protection of the minorities’ rights, in most lands minorities may broadcast their own programmes in the so-called open channels. Representatives of the minorities are members of the Boards of Trustees of public and private broadcasters. In Great Britain, language minorities (Welsh, Irish, Gaelic, Cornish, Asian) have wide access to the electronic media, e.g., the Welsh language in the
public Radio Cymru has 100 hours a week, in Gaelic there are 45 hours a week available on the BBC radio. The Asian Network’s programming is prepared primarily in English, however it also broadcasts in a range of South Asian languages (BBC, 2013).

In Italy, according to the law enacted in 1999 regarding minority languages, there are 12 protected languages and the task of RAI in the contract with the Ministry of Communication is to broadcast programmes in these languages in particular regions of Italy.

In the Czech Republic, a country relatively homogenous in national terms, the Czech Radio has a responsibility to broadcast programmes for minorities and it broadcasts many of them with the participation of minority representatives, most of all in regional broadcasting stations (EU Accession Monitoring Program, 2002: 180).

In Hungary, there exists a developed system of protection of national, ethnical and language minorities. The law about RTV imposes on the public TV a duty to present the culture and language of minorities and a regular broadcast of information programmes for them. It also provides a possibility to sponsor those programs. Magyar Radio is currently producing the programme for 13 minorities (Magyar Radio, 2013).

**THE DEVELOPMENT OF COMMUNITY MEDIA AS AN ANSWER TO THE DISAPPEARANCE OF LOCALNESS FROM AIRWAVES**

To prevent local radio, which is close to local audiences, and local problems from disappearance there was a third radio sector created, additional to the public and commercial. This sector is usually called a ‘community radio sector’. However, there are plenty of different names for this kind of radio as well as different definitions of the term ‘community radio’ itself or, broadly speaking, ‘community media’. Yet, the permanent feature of this sector consists in diversity and variety of forms, sizes and formulas of functioning. It is well summarized by Janey Gordon:

> Just a little research in the area of community radio shows that anybody with any kind of interest in radio knows exactly what community radio is. Ironically, almost everybody disagrees. Very strong views are held about community ra-
there seems to be a general consensus that a community station is a radio station, run primarily by volunteers on a not-for-profit basis, but that seems to be where the agreement ends (2006).

However, undoubtedly there are some definitions which play a primary role, when characterizing what the community media are. In the European context one should include, in the set of these definitions, first of all the one from The Community Radio Charter for Europe adopted on 18 September 1994 in Ljubljana, Slovenia at the first AMARC Pan-European Conference of Community Radio Broadcasters. According to this document, community media stations:

1) promote the right to communicate, assist the free flow of information and opinions, encourage creative expression and contribute to the democratic process and a pluralist society;

2) provide access to training, production and distribution facilities; encourage local creative talent and foster local traditions; and provide programmes for the benefit, entertainment, education and development of their listeners;

3) seek to have their ownership representative of local geographically recognisable communities or of communities of common interest;

4) are editorially independent of government, commercial and religious institutions and political parties in determining their programme policy;

5) provide a right of access to minority and marginalised groups and promote and protect cultural and linguistic diversity;

6) seek to honestly inform their listeners on the basis of information drawn from a diversity of sources and provide a right of reply to any person or organisation subject to serious misrepresentation;

7) are established as organisations which are not run with a view to profit and ensure their independence by being fi-
nanced from a variety of sources;

8) recognize and respect the contribution of volunteers, recognise the right of paid workers to join trade unions and provide satisfactory working conditions for both;

9) operate management, programming and employment practices which oppose discriminations and which are open and accountable to all supporters, staff and volunteers;

10) foster exchange between community radio broadcasters using communications to develop greater understanding in support of peace, tolerance, democracy and development (AMARC, 1994).

It is worth underlining that the importance and role of community was noted by the pan-European institutions – first of all the European Parliament, which in 2008 adopted a resolution of the European “Community Media in Europe” (2008/2011(INI)), preceded by the report prepared by Peter Lewis Promoting Social Cohesion (2008). In the resolution, the community media were defined as:

1) non-profit making and independent, not only from national, but also from local power, engaging primarily in activities of public and civil society interest, serving clearly defined objectives which always include social value and contribute to intercultural dialogue;

2) accountable to the community which they seek to serve, which means that they are to inform the community about their actions and decisions, to justify them, and to be penalised in the event of any misconduct, so that the service remains controlled by the interests of the community and the creation of ‘top-down’ networks is prevented;

3) open to participation in the creation of content by members of the community, who may participate in all aspects of operation and management, although those in charge of editorial content must have professional status (European Parliament, 2008).
The Community Media Forum Europe – an organization founded to strengthen the participation of the “Third Media Sector” in European discussion – estimates on a global scale that community radio outnumbers radio stations in the public and the commercial sectors put together (CMFE, 2012). In plenty of European countries, this sector can be characterized as very vivid, with such leaders as France with as many as 600 community broadcasters and Great Britain with more than 200 such stations. But still in some European countries – mostly in Eastern Europe (and this is also partly the case in Poland), the community based media, if it exists at all, are still regarded as part of the private commercial media sector.

Community radios are mainly small scale, often extremely local, stations. As Donald Browne underlines there is a strong preference for locally produced and oriented materials among community radio stations because they believe that it reinforces a ‘sense of community’. They understand it is important from the listeners’ point of view and make them reliable (Browne, 2012: 161).

The Australian McNair Ingenuity survey showed that local news announcers who sound like ordinary people/like one of us, local news, and local artists as a local voice on the airwaves are very important reasons why people are listening to community radio (2011: 28). They provide local content not necessarily in the form of a local news bulletin. News and information are provided within different programmes, as well as through announcements and local music.

The close relation with the audience is also possible because an open, participatory character and the relatively small scale of such media. Members of the community have a chance to participate in the functioning of the stations in different fields: in programming, management, ownership and funding (Fröhlich, Däschle, Geerts and Jannusch, 2012: 1). Thanks to such a model of operation, the station feels accountable to the community it serves and the other way around - the community often feels responsible for the sustainability of such stations without which the life of the community may be poorer or more complicated.

However, as Guy Starkey suggests, localness in the framework of a community media sector has its obvious limitations. The first one is the small scale of such radios, which are often dedicated to and ac-
cessible by niche audiences. The other feature of this kind of broadcasting is the fact that such stations mostly depend on voluntary work, which may cause the quality of local content broadcast by such stations to be far from a ‘professional standard’ and lead to a lack of credibility and the outflow of listeners (Starkey, 2011: 170).

A HISTORY OF LOCAL RADIO IN POLAND

Local broadcasting in Poland dates back to the interwar period when several regional public radio stations were born. In this period, also, the Catholic priest Maksymilian Kolbe had attempted to start a non-public radio station in the monastery in Niepokalanów but WWII broke the work on this project as well as stopping the functioning of the whole network of local public broadcasting. The state controlled Polish Radio Network was quickly rebuilt after WWII. In 1957, there was also only one legal radio station founded which was functioning outside the Public Radio structure – it was Rozgłośnia Harcerska. This station belonged to the state controlled scouting organization. But in general, similar to other countries from the region, Poland had a state monopoly on broadcasting. Except for some pirate radio broadcasts, prepared by the opposition to the government Radio Solidarity, Polish society had to wait till the breakthrough year 1989 for non-public radio stations on the airways in different parts of Poland. After 1989, not only nationwide private broadcasters but also plenty of independent local radio stations were created. Because there was no legal framework for such broadcasting, they broadcast illegally, often jamming each other. They were created mostly as bottom up initiatives by local enthusiasts and activists. The situation changed in 1992, when the Broadcasting Act was passed by the Polish Parliament. This Act officially abolished the state monopoly on broadcasting. Many local radios were given a chance to legalize their activity.

The great majority of broadcasters have local licences in Poland. According to the National Broadcasting Council, there are more than 284 licensed local radio broadcasters and this number is still growing. However, it does not mean they all play roles typical of local radio. Similarly to other countries, the networking process has its negative impact on this sector. According to the National Broadcasting Council (Krajowa Rada Radiofonii i Telewizji), in 1997 there were
140 independent local commercial radio stations on the air while in 2010 - only 53 such broadcasters.

A great majority of local radio stations are members of one of the big radio networks like RMF MAXX, Złote Przeboje, Plus, or Eska. They play a dominant role in the radio market, not only when we are talking about the number of stations but also their incomes. However, when it comes to local independent radio stations, the situation is becoming more and more stable. The number of independent radio stations in Poland has not decreased in the last few years. After several years when these stations reported a loss, most of them have become profitable (National Broadcasting Council Annual Report 2011).

The existing local independent broadcasters are a mainstay of creativity and local content on the Polish airwaves. As the report prepared by the National Broadcasting Council 2012 entitled The Percentage Of Local Content In Licensed Local Radio Stations On The Basis Of Research Conducted In Years 2009-2011 showed, the programmes broadcast by independent local radio stations in Poland are significantly more diverse, with local content broadcast during the whole day with almost no repetitions. Local networked broadcasters, controlled by big media groups, provide localness in a very tricky way: almost half of the local content is repeated and broadcast outside prime time when very few people listen to those stations (such as very early in the morning or at weekends).

The number of independent broadcasters is small and it is close to impossible for a group of local enthusiasts to start a new local radio station, mostly because of significant financial barriers and lack of free frequencies. The answer to the question how to increase the sum of localness and prevent the localness from disappearing may, to some extent, be found in the development of the community broadcaster sector and the protection of local public broadcasters.

LOCAL PUBLIC BROADCASTING IN POLAND

One can ask the question: If, in Polish conditions, the regional public radio broadcasting is currently, and can be in the future, an effective means of maintaining pluralism and cultural diversity of the society, then how should it be organized for these goals to be achieved.
The situation of Regional Broadcasting Stations of the Polish Radio should be considered in the context of the general situation of the whole system of public radio broadcasting.

The new legal situation in which public radio broadcasting found itself after the enactment of the Law about RTV of 29 December 1992, meaning obtaining the full financial, organisational and program independence by the Polish Radio and Regional Broadcasting Stations, made maintaining the integrity of the public radio broadcasting a foreground issue. In Poland, there are 17 regional broadcasting stations, creating the companies of the State Treasury, which broadcast 17 round-the-clock programmes in the areas of their operation, while 5 companies broadcast urban programmes in Wroclaw, Zielona Gora and Gorzow, in Koszalin and Poznan.

Regional public radio stations broadcast a lot of 'spoken word' programmes - an average of 41% of the annual programme. More than half of the 'spoken word' comprises local content. 11 of 17 regional stations broadcast special programmes for national and ethnic minorities as well as people using regional languages (National Broadcasting Council, 2013).

Currently, although in a form far from a desired condition, Polish Radio is cooperating with Regional Broadcasting Stations in the programme sphere; however, the development of this cooperation is counteracted by local ambitions, institutional and personal interests. The valid law on radio and television broadcasting does not contain any duties, consisting of the cooperation of the companies of public radio or rules creating relations of dependency between particular companies.

What is more, the law brought about a phenomenon unpredicted by the legislation: Polish Radio SA and Regional Broadcasting Stations found themselves in the situation of rivals on the market, if we accept the term of a rival, introduced by the amendment to the Law on the Counteraction to Monopolist Practices of 24 February 1990 (Parliament of the Republic of Poland, 1990). The rivalry takes place in three dimensions: on the radio market for the listener, on the radio commercials and in the efforts for the participation in the licence incomes.
Here also the valid Law on Radio and Television Broadcasting (Parliament of the Republic of Poland, 1992) neither contains norms of rivalry between the companies on the radio market and commercial market, nor does it specify the character of the resolution on the division of licence fee incomes.

This merely indicates the dysfunctionality of the existing system of public radio broadcasting. If we add the necessity to maintain the excessively expanded authority bodies within companies, as well as creating, in particular, the companies’ investment and disintegrated technological platforms inadequate to the needs, established by the “Law on Radio and Television Broadcasting” of 1992, the system of public radio broadcasting should be evaluated as very expensive, not using, as it happens in the private sector, possibilities which are created by consolidation, effect of synergy and economy of scale.

Any new locations of the previous Regional Broadcasting Stations cannot, however, mean the loss of the values which were brought by the Regional Broadcasting Stations working for 20 years in the new organisational shape, promoting regionalism and locality as the peculiar type of social capital of regional broadcasting stations.

The fundamental question today, in reference to regional radio, is in what way the system of regional public broadcasters should be built in the decentralised country, and how to make them become the real media for promoting and developing the local and regional identity.

If we move this concept to the area of contemporary media, aspiring to the creation of a technological and program network within one organisation which would be cheaper and more effective in management, the experiences of the German ARD can be an inspiration. Although it was created in the federalist political system which favoured diversity of the media, when it was brought to life as a network, it meant to consist of state-independent self-government regional stations. Public RTV stations were created by decisions of lands, because the issues of the media belonged to their competence. At the same time, ARD, as the Community of Public Radio and Television Institutions, was created based on decisions of the national broadcasting stations about mutual co-operation, which was to decrease the costs of operation, preparation of programmes and their broadcast.
COMMUNITY BROADCASTING IN POLAND

Unfortunately, in Poland there is no fully recognized non-commercial sector which could be a real supplement to commercial local broadcasting. Admittedly, in 2001 a new category of broadcast media was introduced - 'social broadcaster'. However, this regulation provided an opportunity of development in the third sector only in theory. In practice, only religious radio stations happened to be beneficiaries of these regulations. In 2012, there were only eight social broadcasters and all of them were related to the Church. Despite a legal opportunity to join this sector no other entity is interested in doing so. The main reason is the fact that such stations are totally excluded from the advertising market. There are also no other sources of financial support for such initiatives indicated by the law. It occurred that the exemption from the licence fee is not a sufficiently important impulse to make the appearance of more broadcasters within this legal framework possible. Many broadcasters with a noticeable non-commercial trait decided to exist within the commercial sector. These are stations like: student, local government, NGOs and religious radio stations, without the ‘social broadcaster’ status. However, they fulfil at least some of the community media goals.

The fact that the regulation concerning ‘social broadcasters’ does not really support development of this sector of the media was noticed by the regulator which, in 2012, announced public consultations on broadcasting related issues, including a ‘social broadcaster’ status. It declared it was interested in changing the situation and creating a better environment for community broadcasting and filling a gap between the public and commercial sector. This general idea was also supported by the Ministry of Culture and National Heritage in the letter which was sent by Minister Bogdan Zdrojewski as a reply to the public consultations. The National Broadcasting Council suggested that, to achieve this goal, the necessary changes include: expanding the number of entities which are allowed to apply for such a status; reducing fees for such broadcasters; access to advertising with some limitations; concrete programme restrictions and non-profit nature of such initiatives. All these issues became a subject of discussion during public consultations (National Broadcasting Council, 2012a).
The call for social feedback received a significant response – 503 letters were sent by political parties, local broadcasters, social broadcasters, NGOs, individuals and one academic, however 477 responses had the same content. What is interesting is that these public consultations about the third sector of broadcasting coincided with a similar discussion in the Czech Republic. The Council for Radio and Television Broadcasting, the Czech regulatory body in the broadcasting field, opened a public debate on Community Media by commissioning a report indicating some pathways for introducing a non-commercial media sector in the Czech Republic, where now only two broadcasting sectors are recognized: public and commercial (RRTV, 2012).

The Polish consultations showed how much the general concept of community broadcasting is misunderstood in the Polish society and how often it is confused with only religious broadcasting. 477 identical letters, which were sent to this part of the public consultations, raised the problem of the presence of Telewizja Trwam – a non-commercial, religious, nationwide TV station on the digital multiplex, which had little in common with the main subject of the consultations. What is more, the authors of this letter postulated including not only community, but also religious education content, as a necessary element of this kind of broadcasting. In some responses, a striking opposition between social broadcasters and local broadcasters was created, for example in the one sent by Polska Izba Komunikacji Elektronicznej and supported by the participants of the First Forum of the Local TV Broadcasters, which took place in Jachranka from 21-22 May 2012, and in the letter written by a journalist from the local TV station Gostynin.

The authors of those letters suggested that many local broadcasters were small, not profitable, serve local communities and bring them a social gain. They suggested that they might find themselves in a very bad situation, when more support would be offered to the ‘social broadcasting’ sector whereas in the authors’ opinion, such stations were perfect candidates to join this sector and take advantage of this fact.

The consultations also showed that for some people in Poland, locality in broadcasting is an important and - in the perception of people
taking part in these consultations - endangered issue. Marcin Stelmaszyński, who plans to open a local station, explains in his letter the reasons why he decided to take part in these consultations:

I would like to support locality. Unfortunately, today in the existing legal reality it is impossible. I hope that it is possible to work out such a model of social broadcasting which will keep the big commercial radio stations away from taking advantage of this regulation (2012).

However, putting small scale local broadcasting into the framework of the ‘social broadcaster’ status may prove, in Poland, somehow difficult. It must to be said that some of the existing social broadcasters have strong transmitters and wide coverage. One of them, Radio Maryja, is a nation-wide broadcaster. It will be difficult to change the broadcasting rules for present broadcasters. That is why the postulate to create another category for community broadcasting is worth taking into consideration. In some letters, one can find a suggestion that there is an urgent need to introduce special regulations for ‘local broadcasting’ itself.

It is also worth mentioning that the World Association of Community Radio Broadcasters (AMARC) answered the public consultations about the ‘social broadcaster’ status in Poland. They sent very interesting recommendations based on some ‘best practices’ and regulatory models already existing in Europe and recommendations formulated in documents about community media broadcasting prepared by the European Parliament, the Council of Europe and UNESCO.

The summary of these consultations, prepared by Krajowa Rada Radiofonii i Telewizji, suggested that the most important postulates for the development of community broadcasting were identified as: the need to broaden the catalogue of entities entitled to apply for such a status, exemptions from fees for the licence and for the frequency, reliefs for copyright fees, special programme requirements, including those aimed at local community needs, limitations in advertising, as well as a requirement for participation of the society in the functioning of those stations and the transparent character of their activity (National Broadcasting Council, 2012b).
However, one of important elements is missing in this summary. Apart from some exemptions from fees there is no other public support mentioned. No suggestions included in letters sent by AMARC and academics and supported by NGOs involved in broadcasting, like splitting public service broadcasting licence fees, splitting private broadcasters’ advertising revenue or creating a public fund, were taken into account. It is important, because in most countries with an established community radio sector such support is provided.

As underlined by Henry Loeser, recognition is the natural first step in the ultimate establishment of a vibrant community media sector (Loeser, 2012). A good example showing how important the legal framework is for community media development is Great Britain, where special regulations concerning community broadcasting were implemented in 2004 by Community Radio Order. In 2009 the British regulator in the broadcasting market Office of Communications (OFCOM) reported that the number of community broadcasters exceeded 130 (OFCOM, 2009). In 2011 there were 231 such stations (OFCOM, 2011). Now, Great Britain is one of the European leaders when it comes to community broadcasting. It is worth stressing that public consultations announced by the regulator in Poland concerning the third sector of broadcasting, and some recommendations prepared as the result of this consultation, may be treated as a step in the right direction. However, the implementation of even a few of them is questionable, since the regulator in Poland does not have legislative initiative.

CONCLUSION

When analysing the situation of local broadcasting in Poland it is worth highlighting some key factors which characterize the local radio landscape in Poland. First of all, it must be said that the radio market as a whole is dominated by big media groups. It is also the case in local broadcasting. Independent local commercial radio stations have survived mostly in smaller towns, which are not such attractive markets for big media concerns.

However, there are some positive signals observed in independent local commercial broadcasting. The situation of this kind of station is more and more stable. The number of such stations is not falling and more and more of them are becoming profitable. It may be treated as
a part of a more complex phenomenon. Within Polish society there is a growing interest in local issues. Despite a decrease in the national press readership, local and sub-local titles are still popular and some of them even increased the number of issues sold (Janke, 2012).

For public radio the coming years will be critical, as now the very expensive transition to new technology must be financed. It involves incurring costs (in the case of radio, lasting longer than for television), simulcasting (simultaneous broadcasting in analogue and digital technology), and also paying the costs of testing new technologies of transmissions, costs of promoting new platforms, etc. It is known that these costs will not be incurred by the commercial sector of radio. All these costs are worth incurring, as it is almost certain that the public radio will be the main beneficiary of radio digitalization.

In this situation, many public radio broadcasters in Europe are looking for new sources of financing the costs of digitalization, being created both ‘on the side’ of the programme and ‘on the side’ of transmission. The example of new possibilities of obtaining resources to finance digitalization may be a paid service of the radio on demand in reference to using the archive collections, starting online shopping, and paid sub-castings including specialist contents outside the routine programme, or using the possibilities which are created by public and legal partnerships.

Of course, in the crisis observed in Poland concerning financing, it is necessary to create for the public radio broadcasters more legal possibilities of financing other than only the licence fee sources of financing. To the greatest extent, this concerns the Regional Broadcasting Stations of Polish Radio, as they are 85–90% supported from the licence fee. In this sphere, a fundamental question in reference to the regional public radio is how to provide a proper relation between the scale and costs of its operations and the financing possibilities.

Development of the third sector of broadcasting is gaining more and more recognition. It is proved not only by public consultations concerning ‘social broadcasting’ status but also by a reference to the community media as an important element in the fulfilment of the main goals defined in The Strategy of the Development of the Social Capital in Poland (Ministry of Culture and Social Heritage, 2012). Some very promising recommendations on how to change the reg-
ulations concerning the local and community sector were also included in the information about the main problems of radio and television prepared by the National Broadcasting Council (2013). However, despite these positive signs, it is worth stressing that there is a long way to go from including these recommendations in the documents to implementing them.

It seems that local radio in the commercial, community and public form may be endangered without support. As Guy Starkey rightly noted:

> While radio’s future may well be bright, preserving and stimulating localness may ultimately depend entirely on the will of legislators and regulators to keep it alive, wherever in the world it may be found. Distinctiveness may cost disproportionate amounts of money, and the preservation of heritage – both cultural and radiophonic – may require effort and expenditure as well as political will. The big prize remains the expression and stimulation of cultural difference, yet it may just slip from our hands. Regulation of both ownership and content, as well as provision of support funding, may be essential to stem the tide of local radio going global (2011).

As far as the problem of the local broadcast media preservation is concerned, there are some documents of note. In 2005 the National Broadcasting Council drew up a special document *The Strategy of the National Broadcasting Council for the benefit of the local character and the pluralism in the programme offered*. There were some key suggestions formulated as to how to prevent the local content and independent local broadcasters themselves from disappearing.

In this document, there were also possible ways of supporting local broadcasters specified, like defining features and requirements local programmes must meet, directing local advertisements mainly to local broadcasters, defining rules connected with creating and functioning of radio networks, including their programme and advertisement activity, reliefs in licence fees, frequency fees, copyrights, preferences in the selection of frequencies for local broadcasters. However, most of these postulates have not been put into practice.
As for now, local radio in Poland has to struggle to survive. It is worth stressing that some needed changes in the legislation of local broadcasting may and should be supported by the society. The more active and visible local broadcasters and local communities, the brighter future of local radio will be. Without a bottom up movement for locally routed, small scale radio, the idea of a local, powerful media in Poland, serving the development of democracy, may never be fulfilled.

REFERENCES


Local radio - an endangered species? The polish case


