In 2016, in an article published in the 3CMedia journal, Australia, I set out to provide a snapshot of community radio in Wales, approximately ten years into its existence, highlighting issues particularly pertaining to the sector in Wales. I used the article to outline a number of localised factors that specifically affect the Welsh community radio sector and continue to be of relevance at the time of writing. I alluded to the lack of space on the FM spectrum, a limited number of stations servicing mid-Wales, transmission difficulties caused by the mountainous terrain of Wales and the absence of devolved legislative powers for broadcasting (Ibid). The comparative weakness of indigenous media provision in Wales was also noted, as cited previously, Williams (2008) and Talfan - Davies and Morris (2008). The previous provision (2008 to 2013) of a community Welsh Government community radio fund to the Welsh stations was also mentioned. This very welcome, additional funding stream had ceased with no indications of the funding stream being continued or renewed. I would strong advocate that such a funding stream is re-introduced and suggest that would be money that is wisely spent, enabling overt and meaningful outcomes in Wales. Community radio operates from a progressive 'ground-up' perspective, enabling participation, widening levels of media plurality and endeavouring to give a platform to marginalised, often unheard voices. I would argue strongly here that support for the Welsh community radio sector is absolutely worthwhile, facilitating community engagement and media participation in areas, less well- served by indigenous media outlets and, perhaps, most importantly, giving the disparate communities of Wales, a voice.

The impact of financial austerity has affected Wales as much as other parts of the UK. Indeed, Wales was identified as having 'the lowest employment rate of countries in Britain for all age groups, both sexes, and disabled and non-disabled people' (Equality and Human Rights Commission. How fair is Wales? 2011). I used the journal article to recount the demise of Radio Beca, suggesting that it epitomised the battle to attain sustainable social gain delivery in the Welsh community radio sector. For those unaware of the story, it had been agreed by Ofcom that Radio Beca would be given a much wider broadcast range than the standard five-kilometre radius, in order for it to serve pockets of the Welsh-speaking community across a range of small towns, villages and hamlets in

Carmarthenshire, north Pembrokeshire and Ceredigion, west Wales. This was a welcome and imaginative initiative on the part of Ofcom. However, in reality, that would not, in itself, have been enough to keep Radio Beca on-air, as restrictions on commercial income generation have a disproportionate and highly restrictive impact on community radio stations based, like Radio Beca, in rural, less affluent parts of Wales.

The outcome of the March 2011 referendum famously resulted in an increase in autonomous powers for Wales. However, broadcasting legislation remained in the hands of the Department of Culture Media and Sport (DCMS) with the media in Wales dependent on support from Westminster based MP's for any proposed changes. Williams (2008) puts forward a strong argument to devolve such powers to Wales. His argument is that such a move would generate more accountability for broadcasters to the Welsh public, help build a sense of national community, provide more balance between English and Welsh medium content and create a stronger position for Wales in the future digital media market place (Williams, 2008: 110). That point of view continues to resonate, for without such devolution of legislative powers, it is difficult to envisage the Welsh media industry making significant progress in the short to medium term.

Notably, the community radio stations of Wales have the potential to play an integral role in redressing the imbalance in the Welsh media market place, as independent broadcasters within their specific communities. It is suggested here that limitations within the Welsh commercial and BBC radio sectors, provide a unique opportunity for community radio in Wales. There is clearly potential for community radio to facilitate an alternative voice for the communities of Wales, particularly encouraging citizen participation in the field of localised media. Furthermore, it is argued vehemently that the survival and growth of Welsh community radio is crucially important and that its sustainability should be made 'a specified political, regulatory and cultural priority' (Johnson and Mitchell 2012:24).

The Centre for Community Journalism at Cardiff University has worked with a number of hyper-local websites (websites generating and focusing on very local news stories) in Wales, nurturing coverage of community-based content that may not otherwise be covered by the mainstream media. Hargreaves (2013) sees this new form of online community journalism, as being particularly useful in Wales, as, depending on adequate mobile network coverage and broadband availability it can

take place anywhere, even in some of the more sparsely populated and mountainous regions of the nation.   Stewart (2012) argues that citizen journalism is ideally suited to community radio, providing a unique opportunity for the sector to act as a facilitator of 'democratic participation, to that extent filling a democratic deficit' (Stewart, 2012).   I agree wholeheartedly with that premise. However, it is essential that community radio overtly makes the point about the unique role it can play within the UK broadcasting marketplace. Such overt identification would greatly help the sector to justify requests for the continuance of subsidies, enabling the community radio sector to sustain its impressive social gain delivery.

Howley (2010) describes how 'articulations' meld partnerships between previously un-connected groups, celebrating communities of 'commonality as well as difference' (Ibid). He outlines how such articulations enable the stations to construct and modify links with key agencies, such as funders, volunteer groups and local councils, creating 'shared identity and collective solidarity between disparate groups and individuals' (Howley, 2010: 64). In that manner, feelings of communal belonging are, 'in large measure, articulated through communication' (Ibid). It is argued here that a similar philosophical shift should be encouraged in Wales, increasing collaboration between the various community radio stations of the nation. The Welsh community radio stations enable hyper-local media activity, encourage volunteer participation and widen progressive learning aspirations. For this to continue; there is an urgent need for a conscious, collaborative 'coming together'.

In that spirit, it is perhaps useful to visualise the stations of Wales, themselves, as occupants of a shared community and to assess how those stations communicate with each other. As an encouragement for further inter-action, the Wales Community Radio Network (WCRN) website, the first digital cluster of its type in Wales, was set up, as an online platform for collaboration in 2011. The Welsh community radio stations strategically use social media, such as Facebook, Twitter and What's App to promote themselves. It is suggested here that a dedicated networking website, such as the WCRN, has the potential to benefit the stations in their communication flows with their audiences, other stations and external partners. Increased networking and a move towards more of a shared identity might be highly beneficial in generating advertising sales for the sector, being potentially useful as a means of aggregating advertising revenue regionally and/or nationally.

The eclectic nature of the Welsh community radio sector is plain to see. That eclecticism should be welcomed by the CR stations of Wales, acknowledging the fact that 'community life is far more diverse' than might commonly be imagined (Howley, 2010: 64). It is further suggested here that the stations in Wales augment their proud, independent integrity by constructing communities that serve 'not only to create a common identity among different people but also to differentiate one community from another' (Howley, 2010: 64).

A topical example of 'articulation' was provided, in 2013, when the (then) Department of Culture, Media and Sport (DCMS) issued the Community Radio Consultation Document (2014). Amongst other objectives, it sought responses from the UK community radio sector on the relaxation of restrictions on commercial income, where stations' broadcast areas overlapped with local commercial stations with less than 150,000 listeners. The DCMS consultation was of great interest to the community radio sector in Wales. Just one of the five commercial stations covering mid, west and north Wales, Radio Carmarthenshire, had a MCA above 150,000. At the time, this negated the right of Môn FM, Tudno FM, Point FM, Glan Clwyd AM and (notably) Radio Beca to sell advertising. These were restrictive limitations on these Welsh stations. Indeed, it is difficult to envisage how the stations affected were expected to survive and flourish without the ability to generate realistic levels of commercial support.

Radio Beca, serving pockets of Welsh-speaking communities across a larger area than normal would have been subject to increased transmission costs and was highly likely to have found the restrictions particularly challenging. Their intended broadcast territories included areas served by two commercial radio competitors with less than 150,000 listeners Thus, under the existing legislation, they would have been restricted from selling advertising. The DCMS consultation document indicated that stations serving predominantly rural communities, such as the less densely populated, agricultural parts of mid, west and north Wales received the lowest average income per community served. Radio Beca would not only have been unable to sell advertising, but would also have faced higher than average transmission costs and done so in an area whose population had a lower than average disposable income. Facing such insurmountable obstacles, it is difficult to perceive how Radio Beca could ever have built a sustainable future for itself without significant changes to existing legislature. Ultimately, as stated previously, the station never went on-air. The community radio stations of Wales submitted a

joint response to the consultation document, speaking with a united voice, for the first time, under the auspices of the WCRN.

The legislative amendments suggested by the WCRN did not all come into fruition. Indeed, it is unknown that were even taken into account, within the consultation process. However, the idea of Welsh community radio speaking with one voice, is to be applauded and encouraged, adding strength, to opinions raised by individual stations and creating a national lobby group for the sector.   Encouragingly, the eventual DCMS response included some relaxation of the limitations on community radio selling commercial airspace, allowing for all community radio stations to be able to raise annual income to a maximum level of £15,000 from advertising and/or sponsorship before application of any other current rule. This was a significant development for community radio in Wales.   Above and beyond the £15,000 cap, stations could continue to raise additional commercial revenues so long as the total raised did not exceed 50 percent of their total income. They could do this, for example, by counting volunteer time, income from training contracts and localized Service Level Agreements to count against commercial income.

The freeing up of limitations, as a result of the DCMS community radio consultation process, on the community radio sector's ability to generate commercial support was gratefully received within the sector in Wales. It is seen as a positive move but, capped at such a low level, was not enough to make a definitive difference. Again, it is highly unlikely that this modification would have been enough to sustain Radio Beca, even if it had managed to get on-air. However, relaxations of limitations on the sale of advertising are certainly beneficial. Without on-going sustainability, the stations cannot continue to benefit their communities through the delivery of social gain outcomes.

There are other issues on which the WCRN could help to campaign for community radio in Wales. Further decreases in restrictions on community radio commercial revenue are vital, if the sector is to survive in Wales. Decreased reliance on external funding agencies for financial support is urgently needed, enabling the community radio stations of Wales to use their financial independence to develop robust, independent models for economic stability. Such autonomy would help the community radio sector to be economically pro-active, as they seek sustainable means of delivering social gain outcomes to their target communities in Wales. Increased independence, less reliance on limited pots of funding and deregulation

of the financial limitations on the sector, would all certainly enable a healthier long-term future for the sector in Wales.   However, a campaign group is only as active as its members. Collaboration and connections are 'neither natural nor inevitable' (Howley, 2010: 65). Inter-actions, connections and linkages need to be actively initiated, if they are to occur. The WCRN, or its equivalent, would appear to provide an effective platform for further discussion about pro-active, lobbying, collaborative activity within the Welsh community radio sector.

The recently published Department for Digital Culture Media and Sport (DDCMS) consultation statement did not come to the conclusion that commercial radio stations will be obliged to provide Wales - specific news. That is concerning, as without such enforcement, one wonders where Wales-orientated content will be generated, aside from the BBC. . It is perhaps worth mentioning here that there is, of course, no BBC local radio in Wales, just a, national service.   As mentioned earlier, there is potentially an opening here for community radio to provide hyper-local (citizen) news content for Wales. As cited earlier, Wales needs to build its indigenous media outlets, not diminish them. A London based news hub may well be cost-effective for commercial radio operators but Wales needs journalistic feet on the ground, if it is to adequately serve the needs of the nation. These are all pertinent issues that deserve a united, collaborative response from the Welsh community radio, most expediently, perhaps, through the auspices of the WCRN. The WCRN may also be able to act as a lobby group for Welsh community radio, accumulating responses to the current government consultation on small scale D.A.B licensing. Trials have taken place in England but none, as yet, have occurred here in Wales.

Of course, solidarity can only come into being if participants actively engage in the process. The manner in which sets of interests between groups are articulated is just one of many possibilities, with countless other articulations also being possible. The non-fixed nature of 'articulation' exemplifies the personal influence on how these linkages take shape, illustrating 'the ability of human action to alter, remake, or re-create any social formation' (Ibid). The Welsh community radio stations need to grasp the nettle and consciously manufacture connections and collaborative links that suit the needs of all parties, in so doing, adding a fresh tier of indigenous, hyper-local media in Wales. This articulation and re-articulation of links with government, local councils, grant funders and business partners, as detailed by Howley (2010) is a key factor in the enablement of sustained social gain delivery by community radio in Wales.

The value of Howley's articulation theory and the ways in which its application potentially impact on the on-going viability of the community radio stations of Wales is acknowledged here. Each individual station is tasked with 'articulating a vision of community' (Ibid) that encourages a broad range of participation in their daily operations. Clearly, if members of a local community can see, or hear that social gain is being instigated by their community radio station it is more likely that they will participate. The Welsh community radio stations need to identify how the 'particular and distinctive assets and attributes' of these Welsh localities can be articulated in a manner that respects and reflects 'the lives and experiences of local communities' (Ibid). They also need to overtly communicate that message, in partnership with other agencies.

It is acknowledged that articulation is 'not exclusive to the community radio sector' (Howley, 2010: 69). However, community radio is the only form of broadcasting that is obliged, through legislation, to meet designated social gain objectives whilst simultaneously delivering economic stability. In addition, community radio does this in a non-profit making, often charitable, capacity, and, as outlined here, often faces limitations on its ability to generate commercial revenues and access sources of public funding. The links formulated by community radio are unique in the way that they are strategically 're-articulated to suit the particular and distinctive needs of local communities' (Ibid). In this case, a disparate range of Welsh community radio stations have developed a new way of collaborating with each other, using that as a means of strategically and effectively lobbying a government agency for deregulation. It is hoped and envisaged that further imaginative coupling of hitherto un-connected agencies will ensue, allowing a way for community radio for Wales to survive and flourish.

Finally, looking to the near future, it is worth considering the impact of digital switchover in the UK. This is certainly not all bad news. Digital broadcasting might provide the option for greater capacity. It might allow for additional community radio stations, possibly serving communities of interest as well as geographic communities to be able to launch, enhancing levels of plurality for radio listeners. However, there are concerns that community radio stations may become isolated on FM, with the bulk of listening taking place on DAB and other digital platforms. Ofcom has successfully conducted low power/low cost DAB transmission trials options for community radio in England. In order to retain listener awareness of community radio, it is vital that the stations also migrate to DAB when the UK switchover occurs. It is concerning that commercial stations will be able to drop

their localness requirements on migration to DAB. This could be highly problematic in Wales, with stations owned by major conglomerates becoming effectively London-based networks featuring very limited local news, weather or traffic information for Wales. In such circumstances, the community radio stations in Wales may well have a vital role to play, in the accumulation and provision of genuine local news and information.

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