RadioCentre
SHAPING COMMERCIAL RADIO'S FUTURE

Submission to House of Lords Communications Committee inquiry into digital switchover of radio and television

Executive Summary

1. The digital upgrade process for radio will bring significant benefits for listeners, including greater choice; better sound quality; and improved functionality.

2. The package of measures in the Digital Economy Bill will also bring essential benefits to radio stations of all kinds, from large radio groups to small local stations. These changes are essential due to the economic pressures on Commercial Radio, which have occurred due to structural and cyclical changes.

3. The entire radio industry understands the need for a viable plan to move national and large local services to digital, while ensuring certainty and stability for those small local commercial and community stations that remain on FM.

4. Small local stations are under particular pressure at present, so it is especially important to ensure that small local radio stations are able to benefit from measures in the Bill, especially greater affordability of digital, along with better coverage and licensing certainty for those stations that remain on FM.

5. A number of misleading claims have been made about the implications of the Digital Economy Bill and digital switchover for radio. We recognise that significant challenges lie ahead, particularly on coverage, cars, consumer take-up and funding. However, 95% of the UK radio industry – BBC, Commercial and Community stations – are working together to address these issues on behalf of listeners. We believe that he Digital Economy Bill is a vital piece of legislation for the Commercial Radio sector.

Background

6. RadioCentre is the industry body for Commercial Radio, formed in July 2006 from the merger of the Radio Advertising Bureau (RAB) and the Commercial Radio Companies Association (CRCA). Despite recent changes in membership, all major commercial groups remain shareholders of RadioCentre; a full list of shareholders is included at Appendix 1.

7. RadioCentre members account for 90% of Commercial Radio listening and 86% of industry revenue. The membership of made up of 267 radio stations of all types – including the major Commercial Radio groups, small local radio groups, independent local stations and digital-only services. RadioCentre therefore represents the views and interests of a very broad range of radio stations small and large, and not just the interests of one or two of the largest radio groups. A full list of RadioCentre members is provided at the end of the document at Appendix 2.

8. The role of RadioCentre is to maintain and build a strong and successful Commercial Radio industry - in terms of both listening hours and revenues. RadioCentre operates in a number of areas including working with advertisers and their agencies, representing Commercial Radio companies to Government,

Ofcom, copyright societies and other organisations concerned with radio.

9. Along with the BBC and Arqiva, RadioCentre is a founder member of the cross-industry body Digital Radio UK, representing more than 95% of the UK radio industry, which has come together in its support of digital radio upgrade and the measures outlined in the Digital Economy Bill.

The benefits of digital

10. The radio industry – BBC, Commercial and Community - is united in its conviction that the medium must have a digital broadcast platform as its primary delivery mechanism. This is vital if radio is to continue to thrive and be part of the digital media future. It is inconceivable that in a world of HD, 3D and IP television, of 3G smart phones, of MP3 players, Twitter, You Tube and countless music streaming services, that radio should still be dependent upon analogue transmission.

11. This need is exacerbated by the fact that the FM spectrum is full and has reached the limit of its capacity, which is limiting choice for listeners and opportunities for broadcasters. The radio landscape requires urgent restructuring that puts listeners at the heart of its offering.

12. The greatest benefits from the digital radio upgrade will be for the listening public. Even now, wherever you are in the UK, you can receive more stations on digital radio than on analogue. Services like BBC 7, Jazz FM, FiveLive Sports Extra, FunKids, NME Radio and Planet Rock are only available on digital and are just a glimpse of what will be available in the future.

13. Some commentators have argued that listeners are happy with the current choice and range of radio stations, and that digital is therefore not needed. Similar arguments were deployed by incumbent operators in television prior to the launch of additional terrestrial channels (Channel 4 and Five), as well as digital, satellite and cable broadcasters. However, consumers now welcome the choice that is available on television and could not conceive of reverting to three channels. In this regard, we do not believe that radio will be any different.

14. In a digital age consumers expect to be able to access a wide breadth of content simply and on a range of platforms. For example, by 2012 digital television switchover will mean that UK households will have at least 50 channels through Freeview, or as many as 500 cable and satellite channels. In addition, the rapid emergence of new digital devices and content has revolutionised the consumption of music, television and film through portable devices such as iPods, with similar changes affecting the publishing world with the take up of the Kindle and soon the iPad. These devices provide consumers with an entire catalogue of content on a digital platform. By contrast UK radio listeners only have access to eight national analogue service (five BBC and three commercial), with no commercial pop music service on FM.

15. Digital radio also offers better sound quality. Independent surveys show 76% of listeners think the sound quality of digital radio is as good as or better than FM[1]. There is less interference, less crackle, and no need to retune when

[1] Oliver Rowe Research study commissioned by Digital Radio Development Bureau, 2009

moving around the country. Sound quality in homes and cars will also improve in coming years as coverage improves, emphasising signal strength as well as geographical expansion.

16. Digital radio also offers more interactivity and functionality for consumers. Listeners already enjoy being able to tune into stations by name rather than frequency and the ability to pause, rewind and record. The future of digital radio includes the possibility of watching your favourite band whilst you listen to their music, or downloading a personalised travel report from your local station to your car radio, and these are just some of the possible innovations digital radio will offer.

17. As the industry body for Commercial Radio, we have a clear vision for how these benefits can be delivered. Our vision has localness at its heart, with three strong tiers of listener choice:

- Strong national brands to sit alongside the BBC *on digital*.
- Large local and regional services, *on digital*, to deliver news, information and entertainment to reflect the tastes of their area.
- Small local commercial stations and community services in smaller towns *on either digital or FM*, as they wish.

18. This will necessarily involve the co-existence of digital and FM, with numerous complementary platforms and emerging technologies also playing an important role. Because of the nature of digital broadcasting, in which a number of stations are broadcast on the same digital multiplex, not all stations will necessarily desire a purely digital future. The geographical area covered by a digital multiplex will necessarily be larger than the areas traditionally served by smaller FM stations. FM will therefore continue to have an important role for the foreseeable future, particularly for smaller and rural services, whereas digital works well nationally and for larger local and regional services.

The economic pressure on Commercial Radio

19. The benefits of digital radio and the exciting vision of the future can only be delivered by a combination of legislative and regulatory change, which will both lead to a more solid framework for existing services and also enable the industry to invest in new and exciting services.

20. This is especially crucial as Commercial Radio faces a difficult financial situation due to a combination of structural change in the industry, which has been compounded by the current advertising recession. Indeed Ofcom acknowledges that Commercial Radio is "*facing possibly its greatest ever challenges*"[2]. Small local stations have been hardest hit by a combination of high fixed costs, structural change and recession.

21. Research conducted by RadioCentre for John Myers' independent report commissioned by Digital Britain found that this downturn in revenues has translated to an extremely serious position in terms of profitability. It found:

[2] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.2

- Half of all Commercial Radio stations were loss making, with two thirds of all stations (66%) loss making or only generating profits of less than £100k per annum[3].
- 12% of stations were predicting to lose more than £250,000 in their current financial year (of whom more than 80% also lost >£250,000 last year and of those almost 70% also lost >£250,000k in the previous financial year)[4].

23. The most recent data suggests that total industry revenue for 2009 is expected to be in the region of £500m. This is down 22% from the peak in 2004 calendar year (when revenues were £641m)[5].

24. As well as suffering an acute cyclical downturn in advertising revenues resulting from the recession, the Commercial Radio industry also faces the multiple structural challenges arising from the growth of on-line advertising at the expense of traditional media; consistently high costs due to regulation; and the need to make many millions of pounds worth of investment in dual transmission costs (for both FM and digital), with little if any additional revenue generated as a result.

25. The relative growth of online advertising revenue is well documented. It was reported recently that the UK revenues of Google alone were £1.9bn in 2009, ahead of the £1.87bn forecast for ITV – and five times the entire Commercial Radio sector[6]. On-line is an unregulated sector against which we compete, which is one of the reasons we are calling for de-regulation in order to provide our industry with greater flexibility and freedom to restructure radio businesses so that they are fit for a digital age.

26. Most notably however, has been the growth in Commercial Radio's total transmission costs, which now stand at around £70m a year (up from £50m five years ago). This growth has been driven mainly by the increasing cost of broadcasting on two main delivery platforms – FM and DAB. Broadly speaking these costs break down as, around £40m for analogue transmission (FM and AM), around £20m for DAB transmission and around £10m for other forms of transmission (DTT, satellite etc). To put these figures in context, the sectors increase in transmission costs as a result of dual transmission over the past five years amounts to 80% of the sector's estimated total profits. Indeed transmission costs alone have now begun to exceed annual industry profitability.

27. The status quo for all stations that pay for dual transmission is unsustainable. Therefore it is vital that Commercial Radio finds a way to migrate to digital and take our seat in the digital media world alongside television, music and on-line. The strategic imperative for stations with dual transmission costs to convert to digital is clear.

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[3] Stations generating profits of less than £100,000 per annum are extremely vulnerable to relatively small downturns in revenue (less that £2k per week, equivalent to one major client)

[4] RadioCentre, Profitability and localness survey of local Commercial Radio, March 2009

[5] Radio Advertising Bureau, February 2010

[6] http://www.thisislondon.co.uk/standard-business/article-23798261-google-fails-to-meet-investors-high-demands.do

The Government's plans for radio switchover

28. The consumer benefits of an upgrade to digital radio, along with the economic imperative as far as Commercial Radio is concerned, has galvanised industry support for the Government's plans for the future of radio as outlined in the Digital Britain report, which will be enabled through the clauses in the Digital Economy Bill.

29. The Committee will be familiar with the process that has been outlined by Government for moving national and large local services to digital, as long as certain criteria are met. These criteria are partly about improving provision and coverage, but critically they will also be led by the behaviour and demands of consumers. In particular the Government has said that no switchover date would be set until DAB coverage is equivalent to FM; local DAB coverage reaches 90% of the population; and the majority of listening is to digital services.

30. It was never the intention to set a firm date switchover date in the Digital Economy Bill. It is an *enabling* piece of legislation that provides the powers and means to upgrade services to digital only once the criteria have been met. This puts the listener at the heart of the decision on switching services to digital, with the criteria being assessed in 2013 leading to a possible migration of national and large local services by 2015 at the earliest. This is a sensible approach and in-line with digital television, in so far as it will be a seamless transition with the majority of people already listening on digital by the time any switchover happens.

31. Crucially the Bill allows coverage and listening criteria to be assessed at different points in different regions, depending on the progress that has been made in that area. This flexibility to enable a staggered upgrade is crucial (as it was for TV switchover), as it allows for regional differences in coverage and listening to be considered when setting switchover dates. To remove this, and replace it with a requirement for a single switchover date, would be damaging to both local stations ready to switchover (which would be held up) and those in areas of the country where build out may be slower.

Ensuring benefits for radio stations of all sizes

32. Moving to digital will mean a more competitive radio industry. Larger stations will be freed from the unsustainable financial burden of paying for both analogue and digital transmission; there will be more national commercial stations to compete with the BBC; and larger local stations will be able to compete more effectively with other media. A healthy radio sector of this kind is vital to the future of every station within it, no matter how small.

33. However it is important to emphasise that the Digital Economy Bill also delivers critical benefits for the smaller Commercial Radio stations, which are in most need of certainty and regulatory relief.

34. **This is an enabling Bill. It will allow the industry to make local digital radio 'fit for purpose'**. The local DAB infrastructure, as it is currently planned and built out, is not yet appropriate for a full switchover from FM to digital. The industry must work with Ofcom to improve and extend the coverage of local digital radio multiplexes. The Digital Economy Bill will

facilitate this and provide a future route to digital for those local stations which currently lack a digital pathway but want one. This re-plan will also help the industry to develop ways to make digital radio more affordable for smaller local radio stations; as the high current cost of access to digital multiplexes acts a disincentive to broadcasting on digital.

35. **Stations that remain on FM will have a more certain future**. The migration of larger stations to digital will free up FM spectrum for local Commercial Radio stations, plus Community Radio. This provides the opportunity of access to better signal strength and improved viability. In addition Ofcom will also be able to licence commercial stations for a period of 12 years, rather than just five years as at present. However, we would welcome the support of the Committee in seeking assurances from Ofcom that this will be the case.

36. **Listeners will enjoy equal access to radio stations, whether they are on FM or digital**. The overwhelming majority of today's digital radios also receive FM, and the newly agreed multi-standard WorldDMB digital radio receiver profile will require all new digital radios to receive FM. In addition, the industry has recently announced it will work with receiver manufacturers to develop an integrated station list that will enable listeners to tune seamlessly between FM and digital stations – thus ensuring that the means of transmission will not be a consideration for listeners.

37. **It will open up opportunities for delivering local content in different ways.** The Digital Economy Bill will facilitate regulatory changes (in Clause 34 of the Bill) which will help to transform the fragile economics of small commercial stations, through co-location and programme-sharing where appropriate, helping to ensure the ongoing provision of locally-focussed content. The smallest, most locally-focused stations will be among the greatest beneficiaries of this deregulation, as they are able to adapt to reflect the changing tastes and requirements of their audiences.

38. **It will enable Community Radio and local Commercial Radio to co-exist.** We welcome the fact that digital switchover will mean improved signal strength and viability for community stations, in addition to smaller commercial stations that remain on FM.

<u>Concerns about the Bill</u>

39. RadioCentre's member stations accept that this package of measures represents Commercial Radio's only chance for the foreseeable future to introduce powers that can implement these changes. This is true of stations and groups of all sizes – including larger groups like Bauer, Guardian Media Group, Global Radio and Absolute Radio; as well as smaller groups such as KMFM, Town & Country, CN Group, Lincs FM Group and Tindle Radio, in addition many small and independent stations.

40. However, two radio groups have resigned RadioCentre membership (although both remain RadioCentre shareholders) stating their opposition to the Bill. This appears to be due to issues regarding their specific business models. We do not agree on the threats to local radio that have been presented by opponents to the Bill. Indeed we are keen to ensure that local stations that remain on analogue post-switchover must not be disadvantaged and do not become less relevant to listeners or advertisers.

41. While the lack of certainty around the future of digital radio has meant that it experienced a difficult beginning in the UK, it should not be assumed that this is due to any underlying flaw in the business model, the technology or the potential of the consumer proposition.

42. Opponents of the Bill have made a number of claims of this nature. Short responses to several of these claims are provided below.

43. *The claim: The timetable for digital radio switchover is unachievable and switching off analogue radio will disenfranchise millions of listeners.*

    The reality: The plan for digital radio switchover does not involve switching off analogue, and the Bill does not set any date for switchover. Small local services will remain on FM. The timetable is challenging but it is achievable, and, importantly, it is consumer-led so no one will be disenfranchised.

44. *The claim: The plan for smaller local radio stations to remain on FM will undermine their prominence and threaten their viability.*

    The reality: The Digital Economy Bill will deliver critical benefits for smaller Commercial Radio stations. Stations remaining on analogue will not be disadvantaged, as they will have greater licensing certainty and the opportunity of access to better signal strength to improve viability. The radio industry has committed to working with set manufactures to develop an integrated FM and digital station guide. That will allow listeners to access stations via the station name, irrespective of the platform carrying the service.

45. *The claim: 120+ stations will be left without a digital future.*

    The reality: The Digital Economy Bill will enable a digital future for all those stations that want one, by extending the coverage of digital radio multiplexes to match that of FM (a precondition for switchover), and helping the industry to develop ways to make digital radio more affordable. Digital may not be the best platform for stations wishing to serve small geographical areas. These stations will have the choice to move to digital, and expand their coverage area, or remain on FM.

46. *The claim: Consumers are happy with the current choice and diversity on radio.*

    The reality: Once people have a digital radio, they value the extra choice and range of new services and stations that it brings.

    According to the most recent audience data the weekly reach of digital radio stands at 33.4% or 17.13m listeners. This is now around double the reach of BBC local and regional services which is around 17% or 8.86m listeners[7].

47. *The claim: There are at least 120m analogue radios in the UK, and switchover will have a significant environmental impact.*

    The reality: The actual numbers are much lower and no sets will be redundant. Ofcom research demonstrates that 20.2m analogue sets are used everyday, with 45.9m used at least once a week. The majority of these will be replaced before switchover, especially as the cost of a digital radio continues to fall. In any case no sets will become redundant as small

[7] Rajar, Q4 2009

commercial and community stations will continue to broadcast on FM. It will also be possible to convert existing analogue sets to digital, with an adaptor device (similar to a set top box for TV) will come onto the market soon that will cost around £50, a cost that is likely to reduce significantly over time.

48. *The claim: Without a plan to protect at-risk groups, analogue switch-off will leave some members of society without access to radio.*

The reality: The industry fully supports a Help Scheme to assist vulnerable groups to covert to digital radio if it is determined that one is needed.

49. *The claim: DAB+ should replace DAB.*

The reality: The benefits of DAB+ would be relatively marginal but would make the vast majority of the current 10m digital sets in the UK obsolete (see below).

Challenges that the industry must address

50. We nevertheless agree that there are significant challenges facing the radio industry before the switchover process can proceed. Indeed the issues relating to coverage, cars, technical standards and funding are critical matters for consideration.

- **Coverage**

51. Digital radio is well on the way to matching FM's 98% coverage. National commercial digital services currently reach 90% of the population, while BBC national digital radio stations reach 86%. The majority of the population can also receive local and regional stations on digital.

52. Nevertheless, we agree that **no digital upgrade should be considered until digital coverage matches that of FM**. In addition to maximising the geographical reach of digital signals (which has been a priority up until now), the industry will also need to focus on meeting improving signal strength leading to better reception in homes and cars.

- **Digital radio in cars**

53. When talking to car manufacturers they are reassured to know that the digital sets sold in future will be able to receive DAB, DAB+, DMB-A and FM signals, thanks to the development of the WorldDMB receiver profile.

54. Car and set manufactures were part of the Digital Radio Working Group – and the trade body the Society of Motor Manufacturers and Traders (SMMT) will be part of the new cross-industry body Digital Radio UK. Digital offers a much improved in-car experience for drivers in terms of sound quality, station choice, ease of use and enhanced functionality (e.g. a digital radio chip in sat-nav systems could provide customised, in-depth information on the weather and traffic).

55. An increasing number of cars already have digital radio as standard – Ford now fits them as standard on all medium to top range vehicles and fifteen car manufacturers from Audi to VW fit DAB as either standard or an optional upgrade for as little as £55. In addition, small and effective conversion devices are already on the market, at a cost of around £60.

- **Technical standards**

56. DAB+ is a recent development of the DAB Eureka 147 family of standards. However, this does not mean that DAB is outdated or unusable; Freeview does not use the most up-to-date version of digital TV technology, but it works well, is popular, and has delivered enormous benefits for consumers.

57. DAB is the most suitable digital radio platform at present. This endorsement for DAB was also made by the Digital Radio Working Group (on which car and set manufacturers, consumer groups, DCMS, BERR, Ofcom, community radio, and Arqiva all sat, in addition to radio broadcasters - including UTV Radio). This support for DAB was reiterated in the final Digital Britain report.

58. Shifting to DAB+ at this late stage in the UK's transition to digital would offer only relatively marginal benefits to radio listeners (with the possibility of more services on a multiplex and slight improvements in sound quality) – while generating huge wasted investment for those listeners who have already embraced digital radio, as the majority of the existing 10 million DAB sets in use would become obsolete.

59. However, we do not rule out a transition to DAB+ at some point in the future. New digital radios sold in the UK now have the ability to receive DAB+, so it could be introduced seamlessly alongside existing DAB services once digital is established and the new devices become more commonplace. This is possible as DAB+ uses exactly the same transmitters and broadcast technology.

- **Funding DAB rollout**

60. The industry recognises that it has a responsibility to meet the a proportion of the cost of DAB coverage build-out, but that public investment will also be required to deliver this policy objective. Consequently a working principle has largely been agreed whereby Commercial Radio will build-out up to the point where it is commercially viable to do so. Investment from the BBC will then be expected to bridge the gap between commercial viability and universality in line with its Charter obligations.

61. We agree that there is a clear public policy benefit to enabling the build out of a digital infrastructure for UK radio listeners, so it is appropriate for this element to be funded centrally. This approach was outlined in the Digital Britain report, which stated that there would be an expectation on the BBC to contribute to a significant proportion of the costs of expanding digital radio coverage[8].

62. Estimates of the capital cost of build out vary and depend on a number of variables. However, our estimates of the total cost are significantly less than the current or future cost of analogue transmission.

[8] Digital Britain Final Report, p.97

Conclusion

63. RadioCentre welcomes this inquiry and the helpful scrutiny that the Committee has been able to bring to this matter, which is of such importance to radio listeners in the UK. We hope that the process has been helpful in demonstrating the benefits of the package of measures that are included in the Digital Economy Bill. We also believe that it has illustrated that the industry is committed to moving forward to provide a better range of services for listeners in future across digital platforms, with DAB as the principal broadcast platform but with assurances over a future role for FM.

64. We do not underestimate the challenges that remain, but believe that the enabling measures that will flow from the Digital Economy Bill are essential for radio to strengthen its position at the heart of British daily life.

RadioCentre, February 2010

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APPENDIX 1

CURRENT RADIOCENTRE SHAREHOLDERS

APPENDIX 2

LIST OF CURRENT RADIOCENTRE MEMBERS

3FM
Absolute 80's
Absolute Classic Rock
Absolute Radio
Andover Sound
Arrow FM
The Arrow
Ashbourne Radio
Atlantic FM
Banbury Sound
102.1 Bay Radio (Swansea)
The Bay
The Beach
Beacon Radio (Shropshire)
Beacon Radio (West Midlands)
107 The Bee
106.3 Bridge FM
Bright 106.4
BRMB
95.8 Capital FM
97.1 Radio Carmarthenshire
Central FM
CFM
Channel 103
Chelmsford Radio
Chill
Choice FM
City Talk
Citybeat
Classic FM
Clyde 1
Clyde 2
The Coast
Compass FM
Connect FM (Northants)
Connect FM (Peterborough)
Cool FM
Cuillin FM
Dabbl
Dearne FM
Dee 106.3
Delta Radio
Downtown Radio
Dream 100
FIRE Radio
Forth One
Forth 2
FUN Kids
Galaxy Birmingham
Galaxy Manchester
Galaxy North East
Galaxy Scotland
Galaxy South Coast
Galaxy Yorkshire
GaydarRadio
Gold (Berkshire & North Hampshire)
Gold (Birmingham)
Gold (Bradford)
Gold (Bristol & Bath)
Gold (Cambridgeshire)
Gold (Central Lancashire)
Gold (Devon)
Gold (Dorset & Hampshire)
Gold (East Midlands)
Gold (Essex)
Gold (Gloucester)
Gold (Hampshire)
Gold (Herts, Beds & Bucks)
Gold (Humberside)
Gold (Kent)
Gold (London)
Gold (Manchester)
Gold (Merseyside)
Gold (Norfolk)
Gold (North Wales & Cheshire)
Gold (Northamptonshire)
Gold (Plymouth)
Gold (South Wales)
Gold (South Yorkshire)
Gold (Suffolk)
Gold (Surrey)
Gold (Sussex & Surrey)
Gold (Sussex)
Gold (Teeside)
Gold (Tyne &Wear)
Gold (Warwickshire)
Gold (West Yorkshire)
Gold (Wiltshire)
Gold (Wolverhampton & Shropshire)
Hallam FM
Heart 100.7 (West Midlands)
Heart 100-102 (South Hams)
Heart 102.3 (Dorset & New Forest)
Heart 102.4 & 103.5 (Sussex)
Heart 102.4 (Gloucestershire)
Heart 102.4 (Norfolk & North Suffolk)

Heart 102.6 & 97.4 (Oxfordshire)
Heart 102.6 (Somerset)
Heart 102.7 (Greater Peterborough)
Heart 102.9 & 97.0 (Berkshire & North Hampshire)
Heart 103 (Anglesey & Gwynedd)
Heart 103 (Bath)
Heart 103 (Cambridgeshire)
Heart 103.1 & 102.8 (Kent)
Heart 103.3 (Milton Keynes)
Heart 103.4 (Cheshire & North East Wales)
Heart 106 (East Midlands)
Heart 106.2 (London)
Heart 96.1 (Colchester)
Heart 96.2 & 97.3 (North Devon)
Heart 96.3 & 102. 6 (Essex)
Heart 96.3 (Bristol)
Heart 96.3 (North Wales Coast)
Heart 96.4 (Torbay & South Devon)
Heart 96.6 (Northamptonshire)
Heart 96.7& 97.5 (Hampshire & West Sussex)
Heart 96.9 (Bedfordshire)
Heart 97.0 & 103.0 (Exeter & East Devon)
Heart 97.0 & 96.6 (Plymouth)
Heart 97.1 & 96.4 (Suffolk)
Heart 97.1 (Wirral)
Heart 97.2 & 102.2 (Wiltshire)
Heart 97.6 (Beds, Bucks & Hertfordshire)
Heat Radio
Hertbeat FM
Herts Mercury 96.6
High Peak Radio
The Hits
104.9 Imagine FM
Island FM
Isle of Wight Radio
JACK fm Bristol
JACK fm Oxfordshire
Jazz FM
Juice 107.2
KCFM 99.8
Kerrang! 105.2
Kestrel FM
Key 103
Kingdom FM
Kiss 100
Kiss 101
Kiss 105-108
kmfm Ashford
kmfm Canterbury
kmfm Extra
kmfm Maidstone
kmfm Medway
Radio City

kmfm Shepway & White Cliffs Country
kmfm Thanet
kmfm West Kent

Lakeland Radio
LBC 97.3
LBC News 1152
Leicester Sound
Lincs FM
Lochbroom FM
London Greek Radio
Magic 105.4
Magic 1152 (Manchester)
Magic 1152 (Tyne & Wear)
Magic 1161
Magic 1170
Magic 1548
Magic 828
Magic 999
Magic AM (South Yorkshire)
Mansfield 103.2
Manx Radio
Mercia
Mercury FM
Metro Radio
MFR
Midwest Radio (Ivel 105.6 & 106.6)
Midwest Radio (Vale 97.4 & 96.6)
Moray Firth Radio 1107AM
Nation Radio
NECR
Nevis Radio
Newbury Sound
NME Radio
North Norfolk Radio
Northsound 1
Northsound 2
99.9 Radio Norwich
Oak FM (Hinckley)
Oak FM (Loughborough)
Oban FM
Original 106 Aberdeen
Oxford's FM107.9
102.5 Radio Pembrokeshire
Pennine FM
Planet Rock
Play Radio
Premier Christian Radio
Q Radio
The Quay
Radio Aire
Radio Borders
Radio Ceredigion
Trent FM

Radio Maldwyn
RAM FM
Reading 107
Real Radio North East
Real Radio North West
Real Radio Scotland
Real Radio Wales
Real Radio Yorkshire
Red Dragon
Ridings FM
Rock FM
96.3 Rock Radio
106.1 Rock Radio
Rock Radio North East
Rother FM
Rugby FM
Rutland Radio
Sabras Radio
97.5 Scarlet FM
106.5 The Severn
SIBC
Silk FM
Smooth Radio 100.4 (North West)
Smooth Radio 102.2 (London)
Smooth Radio 105.2 (Glasgow & The West)
Smooth Radio 105.7 (West Midlands)
Smooth Radio 106.6 (East Midlands)
Smooth Radio 97.5 (North East)
Southend Radio
Sovereign Radio
Splash FM
Star 107.5
STAR Radio Bristol
107.7 STAR Radio North Somerset
Tay AM
Tay FM
107.4 Telford FM
Ten-17
TFM Radio
96.2 Touch FM
101-102 Touch FM
102 Touch FM
107.3 Touch FM
Town 102
Traffic Radio (London)
Traffic Radio (Midlands)
Traffic Radio (North West)
Traffic Radio (South & South East)
Traffic Radio (South West)
Traffic Radio (Yorkshire & North East)
Trax FM (Bassetlaw)
Trax FM (Doncaster)
Two Lochs Radio
Viking FM
Wave 102
Wave 105
Waves Radio
West FM
West Sound
West Sound 1035
107.2 The Wyre
Wyvern FM
Xfm London 104.9
Xfm Manchester 97.7
Yorkshire Radio