

#### RADIOCENTRE RESPONSE TO DCMS COMMUNITY RADIO CONSULTATION

## **INTRODUCTION**

- 1. DCMS is seeking views on a number of topics relating to the framework for community radio, including:
  - lifting the restriction on community radio stations taking any income from advertising or sponsorship if they overlap with a commercial radio licence with a coverage area of 150,000 adults or fewer;
  - ii. whether to remove the restrictions on preventing community radio from taking more than 50% of their annual income from on-air advertising and sponsorship, or whether other changes are justifiable;
  - iii. licence extensions for community radio; and
  - iv. the effectiveness of the community radio fund.
- 2. This response focuses principally on the financial restrictions (point i and ii, above), as well as the role of the community radio fund (point iv). It also considers the implications for compliance and regulation.

# **OVERVIEW**

- 3. RadioCentre is broadly supportive of the aims of the community radio sector to deliver distinctive content that is of social gain to local audiences. As long as community stations are sufficiently focused on well-defined social gain objectives that ensure the distinctive nature of their content and funding models relative to commercial radio, there is no reason why they cannot be part of a balanced radio offering in the UK.
- 4. However, we believe that the original remit and purpose on which community radio was founded has been eroded, due to repeated relaxations of the rules around how community radio should be funded in an effort to maximise its viability. We are concerned that this has occurred without taking full account of the impact on other operators, or whether the watering-down of the regulations undermines the distinctiveness of the community radio sector.
- 5. The proposals within this consultation to relax advertising regulation for community stations are a further attempt to support the finances of community radio, which has expanded too far, too quickly and without a full assessment of its viability and impact. Our response therefore focuses primarily on revenue and the need to ensure an appropriate and sustainable balance in the UK radio market, in order to retain a clear distinction between different sectors and ensure financial stability for commercial radio companies. We ask Government for several assurances before any legislative changes are implemented regarding community radio.
- 6. We propose that Government considers more substantial research into the impact any changes will have on local media markets. This consultation and the following proposals have been undertaken without any thorough research or analysis as to what will happen should the changes be implemented. To external observers this does not appear to be evidence-based policy demonstrating a need for change, but more due to historically strong political support.
- 7. We would like confirmation that the economic safeguards for commercial radio will remain as set out in the original Community Radio Order. Despite its popularity commercial radio continues to face increasingly difficult operating environment, particularly stations covering



smaller population areas. A community radio sector that is even more commercially minded would bring further pressures.

- 8. We request that Ofcom takes more active steps to monitor and enforce compliance of community stations with current regulations. Some community radio stations continue to struggle to meet required regulatory standards, which devalues radio as a whole.
- 9. We seek assurances that the key characteristics of community radio, particularly the delivery of 'social gain', are prioritised. The content differences between community radio and commercial radio are being eroded. Many community stations now play similar music, adopt similar branding and even employ similar staff members. Community licences should not be seen as a route to creating a commercial station through the back door, or as a marketing channel for broader business interests.
- 10. Ultimately, we believe deregulation is unnecessary and could potentially threaten the future economic viability of other local media. We recommend that Government instead concentrates on prioritising statutory obligations to retain the distinct social gain of community radio, to ensure there is an appropriate and sustainable balance in the radio market overall between BBC, commercial and community stations in the future.

### **BACKGROUND**

- Legislative background
- 11. The power to introduce community stations was introduced in the 2003 Communications Act, which outlines the purpose of community radio as: 'provided primarily for the good of members of the public or of a particular community, rather than for commercial reasons' and to 'confer significant benefits on the public or on the communities for which they are provided'.
- 12. The specific characteristics of community radio stations were then outlined in the 2004 Community Radio Order. This included a requirement to be 'for the good of members of the public or of particular communities...in order to deliver social gain, rather than primarily for commercial reasons or for the financial or other material gain', as well as a specific safeguard for commercial radio which stated that community radio stations must 'not prejudice unduly the economic viability of any other local service'<sup>2</sup>.
- 13. Since the first community radio stations started broadcasting in 2005 a new community radio station has launched, on average, every 13 days<sup>3</sup>. Over 270 stations have now been licensed, of which 211 are currently on air. However, from their inception, community stations have struggled to raise finance and compete in a crowded local media market, which has been further hampered since 2008 by a prolonged recession. To date, 33 stations licensed by Ofcom have handed their licences back, or have had them revoked, predominantly due to financial issues<sup>4</sup>.
- 14. To this end, financial restrictions on community stations were relaxed in the 2010 Community Radio Order<sup>5</sup>, which for the first time allowed community stations to be licensed in any area

<sup>&</sup>lt;sup>1</sup> Communications Act 2003, Section 262(2)

<sup>&</sup>lt;sup>2</sup> The Community Radio Order 2004, Sections 3(1)& 5(3)

<sup>&</sup>lt;sup>3</sup> Ofcom, <u>'200 community radio stations now on air'</u> [Accessed 15 April 2014]

<sup>&</sup>lt;sup>4</sup> Ofcom, <u>The Communications Market 2013: Radio and audio</u>, July 2013

<sup>&</sup>lt;sup>5</sup> The Community Radio (Amendment) Order 2010



(including where they overlap with the smallest commercial stations) and removed the restrictions on obtaining funding from a single source. Other restrictions on advertising revenue which were designed to help protect local commercial media remained in place.

- 15. In 2012, faced with continuing financial problems in community radio, DCMS conducted a number of workshops with the sector to consider the case for further changes to the legislative framework. Significantly, only the Community Media Association (CMA) and community radio stations were invited. In December 2013 the Minister announced the Department would consult on 'removing some of the complex and restrictive financing regulation' that exists in the sector.
- Evidence base
- 16. What is most striking about the past ten years of community radio is that despite several legislative attempts to assist the sector financially, it has been dealt with in isolation and in the absence of any evidence or analysis. There has been no effort to assess whether these stations are truly distinctive, and what their impact is upon established commercial media.
- 17. As the consultation outlines, 'when community radio legislation was first introduced in 2004, stations were subject to strict financial requirements... to provide an appropriate level of protection to existing small commercial radio stations at a time when the impact of community radio stations could not be quantified.' In fact, no research about the financial impact of community stations in the UK has *ever* been undertaken, even when there was a further consultation and regulatory relaxation in 2010.
- 18. RadioCentre is concerned that the current consultation recommendations are being made by DCMS without any objective and thorough primary research or analysis about the local radio market. Indeed, we believe Government has been over-reliant on a very narrow scope of sources, and that this has resulted in a consultation which lacks the appropriate wider context required for such legislative ambition.
- 19. The absence of research has led the consultation to cite secondary research conducted in the United States in 2011 as part of the justification for the proposed measures. This research claimed that low-power FM (LPFM) radio stations as community radio is known in the United States generally do not have an economic impact on commercial FM radio stations in the United States.
- 20. The fact that the United States market lacks a public broadcaster with the market share, cross promotional capabilities or brand recognition of the BBC, is just one of the reasons we believe this research is immaterial when attempting to draw parallels with the UK. Moreover, the report only concluded that community stations did not threaten commercial radio viability in the US, was only reached 'given the regulatory and operational constraints' currently placed on US community stations. Thus highlighting the continued importance of regulatory restrictions remaining on community stations to retain a clear distinction from commercial services.
- 21. RadioCentre submits that a more relevant and recent piece of research is a study by the Broadcasting and Creative Industries Policy Team of the Scottish Government, which was

<sup>&</sup>lt;sup>6</sup> Ed Vaizey MP, speech on Digital Radio Action Plan, December 2013

Department for Culture Media & Sport, <u>Community Radio Consultation</u>, February 2014, p. 8

<sup>&</sup>lt;sup>8</sup> United States Federal Communications Commission, <u>Economic Impact of Low-Power</u> <u>FM Stations on Commercial FM Radio: Report to Congress</u>, January 2013, p.19.



- conducted in 2012<sup>9</sup>. Whilst this research was generally supportive of community radio, and highlighted a need for further investment, it concluded that greater flexibility in relation to advertising levels was not the primary factor that required attention. Instead it was only one of a combination of issues which the report suggested as assisting community radio in the future.
- 22. Nevertheless, Government continues to consider lifting the on-air advertising and sponsorship restrictions on community radio stations. To external observers this appears to be more due to a successful lobbying campaign and historically strong political support, rather than a need for change. We ask that DCMS undertakes an objective research project into the impact of community stations as a matter of urgency, and consults commercial stations as part of this analysis, before recommending further changes.

#### **FUNDING**

- 23. Ofcom figures highlight that the community sector is in some financial difficulty, with average income declining year on year since 2007. The most recent report on the market shows that the (mean) average station income has fallen 5.4% since 2011. The largest income area to reduce as part of this was individual grants; which fell from 45% in 2008 to 29% in 2012<sup>10</sup>. This would seem to imply that it is public funding, rather than advertising deregulation, which should be under consideration.
- 24. Indeed there is no evidence that the current financial problems faced by community radio are actually a result of advertising restrictions. The combination of public spending cuts and the prolonged economic downturn would seem to be much more significant factors. Moreover, the licensing of ever more community stations into an already saturated local advertising market has created further competition for already limited revenue.
- 25. RadioCentre believes that there are two factors which Government has perhaps not considered fully in this regard. Primarily, the relaxation in advertising regulation since 2010 appears to have already contributed to a small increase in ad revenue. According to Ofcom, the share of on-air advertising and sponsorship revenue increased from 26% to 29% between 2011 and 2012, which in cash terms meant an average increase from £15,665 to £16,530.
- 26. Secondly, the downturn in grants was during a period of unprecedented economic recession, when all forms of funding were reduced, whether public funding, local authority support or philanthropy. As the economy now looks to be growing faster than any other major world country<sup>11</sup>, it is possible that grant income may also increase. Indeed, lottery funding for community stations continues<sup>12</sup>, national Governments in Wales<sup>13</sup> and Scotland are already examining ways to assist their community stations, whilst this consultation is also appropriately considering increasing the Community Radio Fund.
- The Community Radio Fund
- 27. Given the financial evidence available, RadioCentre believes that the Community Radio Fund offers a significant and practical way to secure the future of the community radio sector. It

<sup>&</sup>lt;sup>9</sup> The Scottish Government, <u>A Review of Community Radio</u>, February 2012

<sup>&</sup>lt;sup>10</sup> Ofcom, *The Communications Market 2013: Radio and audio*, July 2013, p. 236.

<sup>&</sup>lt;sup>11</sup> BBC News, <u>'IMF: UK economic growth to reach 2.9% in 2014'</u>, 8 April 2014

<sup>&</sup>lt;sup>12</sup> Radio Today, <u>'Radio Scarborough gets cash but no licence'</u>, 11 October 2013

<sup>&</sup>lt;sup>13</sup> Welsh Government, 'Community radio stations to receive funding to the tune of £100,000', 10 April 2012



provides both guaranteed income to those that need it, and indirectly means that further pressure is not applied on the fragile local advertising market by community stations seeking extra revenue. We would advocate it should be increased via further public sector funding; something the Scottish Government considered in their 2012 study of community radio<sup>14</sup>.

- 28. The fund already contributes more to the sector currently than any individual advertiser or third-party donator; with £500,000 available for the 200 community stations per annum. In 2013 DCMS allocated £429,000 of the £500k available, with the average amount around £15,000<sup>15</sup>, but we believe that the Fund could be utilised more effectively and even enhanced.
- 29. Specifically, DCMS should examine ways of bolstering the fund directly through available lottery funding or even seeking contributions from the BBC licence-fee. If community radio is to 'deliver social gain, rather than primarily for commercial reasons or for the financial or other material gain' then there is a genuine case that for public investment. However, applications for funding (or indeed licensing) must be considered rigorously and demonstrate a truly distinctive service with social gain. We would also question whether it is appropriate for Ofcom to continue to be responsible for overseeing the fund, given that it also acts as the regulator for the sector.

#### Revenue

- 30. In a tough economic climate, commercial radio companies understand the cost pressures of running a local service with content which has value to local communities. Despite its continuing popularity the industry has faced a uniquely difficult financial situation in recent years. Total commercial radio revenue for 2013 was £537m, down 33% in real terms from a decade previously (when revenues were £641m).
- 31. The main cause of these challenging trading conditions has been the severe advertising recession. The industry also faces multiple structural challenges from the growth of digital advertising at the expense of traditional media; the need to make many millions of pounds worth of investment in dual transmission costs, for both FM and DAB, with little if any additional revenue generated as a result; and consistently high costs due to regulatory restrictions on how and where stations operate.
- 32. These combined financial pressures have meant historically low profit margins, with small stations being hardest hit. This was recognised explicitly by the Minister himself in Parliament recently, who stated: "It is incredibly difficult to run a successful local independent radio station. The people who run them are not rolling in money, or printing money; even those who run local commercial stations are almost running a community service." <sup>17</sup>
- 33. This is certainly the case for many of the smallest commercial stations with population coverage of 150k or fewer, which may now face the prospect of additional competition from community radio for the first time. From the most recent turnover figures available to RadioCentre, we estimate that these 89 licensed stations (listed in the attached <a href="appendix">appendix</a>) have total revenue of less than £30m. The mean average turnover of these stations is £312k, but they range in

<sup>&</sup>lt;sup>14</sup> <u>Review of Community Radio</u>, p. 11.

<sup>&</sup>lt;sup>15</sup> Radio Today, <u>'Ofcom gives out £250k to community radio'</u>, 6 March 2013 *Ofcom, 'Cash boost for 12 community radio stations'* [Accessed 15 April 2014]

<sup>&</sup>lt;sup>16</sup> Community Radio Order, Section 3(1)

<sup>&</sup>lt;sup>17</sup> HC Deb 28 November 2013, Column 526



- revenue and profitability: with at least 10 commercial radio stations reporting revenues at around £100,000 or less, which is income more akin to that of a community station.
- 34. If these 89 commercial stations are achieving profit margins of 5% (which is a generous according to previous Ofcom and industry analysis) RadioCentre estimates that they may only make around £15,000 profit per annum on average. Given these slim profit margins, commercial radio operators believe that any changes to community radio should not be undertaken if they further damage the distinctive offerings and financial balance which exists in the wider radio market.
- 35. RadioCentre does not support permitting community stations to take advertising and sponsorship where they overlap with the smallest commercial stations (< 150k people), particularly given the absence of any research or impact assessment. The smallest commercial radio stations (which this change would affect) already face incredibly difficult trading conditions, competing fiercely for ad revenue with other commercial radio companies, online businesses, local newspapers and local TV and compete for audience with the BBC. We believe that such a change will undermine the sustainable balance of the UK radio market.
- 36. Indeed, we oppose *any* attempt to introduce a relaxation on community radio advertising. This includes lifting the cap of 50% of revenue being from advertising and sponsorship, or introducing a regulated 'Fixed Revenue Allowance' as proposed in the consultation. The current strength of community radio is that it creates broadcasting space free from commercial interests. Further relaxation of advertising would weaken this independence, be in direct opposition to the statutory obligations listed above and dilute the distinctive aims of community stations.

## **COMPLIANCE AND REGULATION**

- Community radio output
- 37. We believe that there are wider issues regarding compliance and regulation of community radio output, which should be a higher priority for Government and Ofcom. It is unclear to us whether Ofcom has the necessary level of resource or commitment to oversee this expanding sector (particularly when it also acts as the sector's champion and fund allocator), or whether its remit to address these issues is understood clearly by those working in community radio stations,.
- 38. Various community stations have an inconsistent record of financial compliance. Ten community radio licensees failed to pay their licence fees in 2012 alone<sup>18</sup>, whilst that same year Erewash Sound in Derbyshire, Felixstowe Radio in Suffolk and The Super Station Orkney were all found to be bringing in more than the allowed amount of income via on-air advertising<sup>19</sup>.
- 39. The Ofcom Broadcast Bulletin consistently features community stations that have not sufficiently respected the responsibilities granted to them through spectrum. Language<sup>20</sup> inappropriate for the listening audience became such a problem in 2012 that Ofcom had to arrange a compliance meeting at Riverside House. Swearing is only one such example: last year Southampton station Unity 101 aired an interview with a doctor who advised parents not to

<sup>&</sup>lt;sup>18</sup> Radio Today, 'Ofcom names stations which failed to pay', 4 July 2012

<sup>&</sup>lt;sup>19</sup> Radio Today, <u>'Community stations breach funding rules'</u>, 17 December 2012

<sup>&</sup>lt;sup>20</sup> Radio Today, <u>'Anything Goes for Bishop FM except F-word'</u>, 25 April 2012; and <u>'Community station in breach for swearing'</u>, 17 December 2013.



- vaccinate their children, in direct opposition to an overwhelming body of evidence and conventional health advice and in breach of broadcasting rules<sup>21</sup>.
- 40. Community radio could not function without volunteers, but there are also clearly difficulties associated with their involvement. The Scottish Government study highlighted that 96% of community radio volunteers are involved in presenting. In the absence of appropriate training or vetting, this can impact on quality and compliance.
- 41. A growth in irresponsible, unchecked or poor quality broadcasting is of great concern to many, including commercial radio stations. For many listeners, radio in the UK is simply broken into 'BBC' and 'non-BBC'. If listeners and advertisers start to consider any 'non-BBC' station to be in the same category grouping commercial stations and community stations together this could be a damaging perception. Indeed, Ofcom's study into small radio stations has already highlighted that when listeners were asked whether they believed their small-scale station was 'not-for-profit' or 'small commercial' 25% of listeners simply did not know<sup>22</sup>.
- 42. This perception is not helped by the fact that many community stations seek to imitate commercial radio, playing similar music or acting as marketing channels for broader business interests. Although Ofcom has highlighted listeners' views that community stations are more similar to 6Music than commercial radio, <sup>23</sup> we understand that 75% of stations include chart or mainstream pop music as a key part of their music output. This output is not as distinct as we would expect from a service supported by public sector finance and it is unclear whether this is due to the way in which stations have been licensed or because of ineffective regulation.
- 43. Ofcom needs to improve standards of compliance and distinctive public service broadcasting accordingly, both to ensure stations are meeting the appropriate standards required of radio broadcasters and in order to help the industry as a whole. For many in commercial radio specifically those in the smaller independent stations broadcasting is not just a hobby, but their livelihood. As noted above, we would be concerned if poor perceptions of the medium were allowed to continue to grow unchecked.
- 44. We propose that Ofcom takes more active steps to monitor and enforce compliance of community stations with current regulations, devoting more resources to this task as required. It should also increase its efforts to communicate current licence conditions and broadcasting code rules to ensure that community radio operators understand their obligations.
- Licensing and conditions
- 45. As well as a continued focus on ensuring community radio content is distinct and of social gain for local communities, consideration also needs to be given to their licence conditions.

  RadioCentre has received several representations from commercial stations concerned that community stations are increasing the power of their transmitters further than prescribed in their licences, and Ofcom is refusing to intervene.
- 46. Ofcom's approach to community stations on FM in urban areas is only to offer coverage areas of up to 5km. Yet a community radio service in Harehills, Leeds, called Asian Fever, can be picked up between 15-25km away and the station regularly boasts about this coverage to both

<sup>&</sup>lt;sup>21</sup> Radio Today, <u>'Southampton station in second Ofcom breach'</u>, 7 November 2013

<sup>&</sup>lt;sup>22</sup> Ofcom, *The future of small scale radio*, July 2011, p.34

<sup>&</sup>lt;sup>23</sup> <u>Ibid</u>, p.28



advertisers and listeners on air; whilst in Northern Ireland, community station Blast FM has also been reportedly broadcasting to much larger areas than specified within its licence. Similar issues with poorly defined and policed coverage areas have been reported across the UK, to date we do not have an example of when Ofcom has intervened.

- 47. It could be argued that the current problems facing community radio are in part because of Ofcom's enthusiasm for licensing ever more stations. In 2009, commercial radio executive John Myers was commissioned by Government to review why local commercial radio was under such financial pressure, similar to how community radio is now. Myers argued that too many stations had been licensed over the last two decades, despite the lack of growth in local advertising<sup>24</sup>. It would be unfortunate if DCMS and Ofcom were to oversee an expansion of community radio advertising demand that created similar difficulties.
- Social gain
- 48. Community stations that prioritise the purposes outlined in the Community Radio Order can be valuable and distinctive parts of local media 'for the good of members of the public or of particular communities...in order to deliver social gain, rather than primarily for commercial reasons or for the financial or other material gain'<sup>25</sup>.
- 49. The best community stations are those which have distinct community functions such as colleges or other specific communities of interest as well as providing unique content which brings wider social benefits to local people. These benefits may be providing a voice to those, such as older people or speakers of minority languages, who may find it harder to access the media, or require training and work experience opportunities for career development.
- 50. Initiatives by stations such as 99.8FM KCC Live, which teamed up with Knowsley Community College to deliver a free, nationally recognised qualification in radio;<sup>26</sup> or Brit FM's annual 12-day broadcast, featuring live sessions from Brit School music students some of whom have gone onto broadcast for Radio 1Xtra and Kiss FM; is content unique to community radio, which cannot be replicated as easily in the commercial market.
- 51. Commercial radio companies admire such distinctive broadcasting, and are keen to support training initiatives across the industry where possible in the future. Indeed, in the Scottish community radio study, a good proportion of station managers agreed that "the sector would benefit from improving links with professional broadcasters, for example through training, workshops, increased coverage, handing down redundant equipment and access to local news feeds"<sup>27</sup>. In some areas such as the Isle of Wight where Isle of Wight Radio works with the local community station Angel Radio collaboration already takes place.
- 52. RadioCentre recommends that DCMS examines ways of strengthening ties between community and commercial stations in local areas to ensure they are not in competition, but working for the future benefit of the audience and the radio industry as a whole.

<sup>&</sup>lt;sup>24</sup> 'More than 50 local radio stations could close without regulatory shakeup', *The Guardian*, 16 April 2009

<sup>&</sup>lt;sup>25</sup> Community Radio Order

<sup>&</sup>lt;sup>26</sup> Radio Today, <u>'KCC launches community radio media course'</u>, 20 March 2013.

<sup>&</sup>lt;sup>27</sup> A Review of Community Radio, p.45.



## **ABOUT RADIOCENTRE**

53. RadioCentre is the industry body for commercial radio. It represents a range of commercial radio groups and stations from rural, small scale ventures, to household names serving major metropolitan areas. RadioCentre's member companies operate 245 licensed stations across the UK, through 45 different businesses, which represent 90% of commercial radio in terms of listening and revenue.

RadioCentre, April 2014

RadioCentre
6<sup>th</sup> Floor, 55 New Oxford Street
London
WC1A 1BS
t: +44 (0) 20 7010 0650
www.radiocentre.org



# APPENDIX – LIST OF COMMERCIAL RADIO STATIONS UNDER 150K POPULATION (BY OWNER)

Name	Area	Owner	Population
Connect FM (Peterborough)	Peterborough	Adventure Radio	136,403
Dream 100	Tendring	Anglian Radio	117,154
North Norfolk Radio	North Norfolk	Anglian Radio	37,930
CFM	West Cumbria	Bauer Media	97,808
Radio Borders	The Borders	Bauer Media	81,807
South West Sound	Dumfries & Galloway	Bauer Media	86,700
Jack FM (Swindon)	Swindon	Celador	139,722
The Breeze (Andover)	Andover	Celador	39,624
The Breeze (Basingstoke)	Basingstoke	Celador	99,745
The Breeze (Bath)	Bath	Celador	82,433
The Breeze (Bridgwater)	Bridgwater and West Somerset	Celador	38,299
The Breeze (Cheltenham)	Cheltenham	Celador	111,730
The Breeze (E.Hants/ SW Surrey)	Alton/Haslemere	Celador	73,032
The Breeze (Frome & W. Wilts)	Warminster	Celador	18,410
The Breeze (Newbury)	Newbury	Celador	67,103
The Breeze (North Dorset)	Shaftesbury	Celador	53,710
The Breeze (North Somerset)	Weston-super-Mare/N.Somerset	Celador	73,478
The Breeze (Winchester)	Winchester	Celador	50,343
The Breeze (Yeovil)	Yeovil	Celador	105,501
Lakeland Radio	Kendal/Windermere	CN Group	39,979
Dee 106.3	Chester	Dee 106.3 Ltd	110,213
Silk 106.9 FM	Macclesfield	Dee 106.3 Ltd	116,157
Heart Anglesey and Gwynedd	Caernarfon	Global Radio	94,873
Heart Essex	Colchester	Global Radio	131,083
Heart Essex	Harlow	Global Radio	108,837
Heart North Wales Coast	North Wales Coast	Global Radio	138,711
Heart South Hams	South Hams	Global Radio	81,689
107.3 FM Radio Exe	Exeter	Independent	132,783
Argyll FM	Kintyre, Islay and Jura	Independent	9,400
Cuillin FM	Skye	Independent	6,149
Heartland FM (Perth)	Perth	Independent	45,276
Heartland FM (Pitlochry)	Pitlochry & Aberfeldy	Independent	5,352
High Peak Radio/ Ashbourne	Buxton	Independent	76,674
Isle of Wight Radio	Isle of Wight	Independent	103,792
Isles FM	Western Isles	Independent	13,551
Lochbroom FM	Ullapool	Independent	1,922
Mansfield 103.2	Mansfield	Independent	137,739
NECR	Inverurie	Independent	65,008
Nevis Radio	Fort William	Independent	11,257
Oban FM	Oban	Independent	8,690
Radio Hafren	Montgomeryshire	Independent	67,335
RNA FM	Arbroath	Independent	20,568
SIBC	Shetland Islands	Independent	15,574
Sunshine 855	Ludlow	Independent	97,026
Two Lochs Radio	Gairloch & Loch Ewe	Independent	1,681



Wave 102	Dundee	Independent	110,451
Waves Radio Peterhead	Peterhead	Independent	45,169
KMFM Ashford	Ashford	KMFM	66,810
KMFM Canterbury	Canterbury	KMFM	65,624
KMFM Folkestone/Dover	Dover/Folkestone	KMFM	107,209
KMFM Maidstone	Maidstone	KMFM	90,329
KM-FM Thanet	Thanet	KMFM	93,169
Compass FM	Grimsby	Lincs FM	91,992
Rutland Radio	Rutland	Lincs FM	29,034
Trax FM	Bassetlaw	Lincs FM	34,848
Arrow FM	Hastings	Media sound holdings	86,353
Bright 106.4	Burgess Hill and Haywards Heath	Media sound holdings	107,975
Sovereign Radio	Eastbourne	Media sound holdings	130,359
Splash FM	Worthing	Media sound holdings	113,487
Q100.5 FM (formerly Five FM)	Newry	Northern Media Group	51,702
Q101.2 FM	Omagh and Enniskillen	Northern Media group	81,247
Q102.9 FM	Londonderry	Northern Media Group	107,128
Q106/7 FM (formerly Six FM)	Mid Ulster	Northern Media Group	74,471
Q107 FM (formerly Seven FM)	Ballymena	Northern Media Group	86,328
Q97.2 FM	Coleraine	Northern Media Group	44,948
Banbury Sound	Banbury	Quidem	60,770
Oak FM (Hinkley)	Hinckley	Quidem	59,809
Oak FM (Loughborough)	Loughborough	Quidem	80,499
Rugby FM	Rugby	Quidem	58,763
Touch FM (Warwick)	Warwick	Quidem	103,967
Channel 103	Jersey	Tindle Radio	72,419
Island FM	Guernsey	Tindle Radio	51,342
Bridge FM	Bridgend	Town and Country	80,939
Radio Ceredigion	Ceredigion	Town and Country	72,088
Radio Pembrokeshire	Pembrokeshire	Town and Country	89,127
KLFM	King's Lynn	UKRD	96,144
Mix 96	Aylesbury	UKRD	147,310
Spire FM	Salisbury	UKRD	74,802
Star Radio	Cambridge	UKRD	134,258
Star Radio (North East)	Darlington	UKRD	108,262
Star Radio (Northallerton)	Northallerton	UKRD	35,231
Wessex FM	Weymouth and Dorchester	UKRD	106,779
Yorkshire Coast Radio	Scarborough	UKRD	82,901
Yorkshire Coast Radio	Bridlington	UKRD	28,405
Signal 107	Shrewsbury	UTV	106,721
Signal 107	Kidderminster	UTV	83,588
Signal 107	Telford	UTV	114,120
Your Radio	Fife	Your	33,628
Your Radio	Helensburgh	Your	22,389