RadioCentre response to Ofcom Consultation on Radio: the implications of Digital Britain for localness regulation

Executive Summary

1. **RadioCentre is the industry body for Commercial Radio.** This response is the result of detailed consultation with the RadioCentre Board and Public Affairs Sub-Committee[1] and as such constitutes a joint submission on behalf of the Commercial Radio industry**.**

2. **We welcome Ofcom's consultation** on localness regulation and the implications for these rules that stem from the Digital Britain Final Report, as we believe it provides an important opportunity to reduce the regulatory burden on the sector at an extremely challenging time.

3. **Commercial Radio faces huge financial challenges**. The Commercial Radio industry has been particularly badly affected by falling advertising revenue in recent years, compounded by the recession. Indeed Ofcom acknowledges that Commercial Radio is "*facing possibly its greatest ever challenges*"[2]. Recent independent analysis commissioned by RadioCentre[3], has also shown very significant declines in revenue and Commercial Radio's overall profitability. The full analysis has been submitted confidentially as an Annex to this response. It illustrates the severity of the current financial situation facing Commercial Radio and the fact that there is no immediate prospect of a significant recovery.

4. **The industry requires significant regulatory changes**. The Digital Britain proposals on localness are a critical part of a package of measures under consideration by the Government and Ofcom, which would update current regulation and help to improve the financial viability of stations. This includes the parallel consultation being conducted by Ofcom on modernising the media ownership rules[4], as well as the proposal for comprehensive revision of the current rules contained within Section 9 and 10 of the Broadcasting Code.

5. **These changes must be implemented as soon as practically possible**. The removal of outdated or intrusive regulation must be conducted coherently and transparently, so Ofcom's approach of consulting ahead of the passage of legislation is welcome. However, it is also clear that, in some areas, Ofcom already has the power to act and, in these circumstances, we urge Ofcom to implement changes immediately.

6. **Delivering these changes will provide the opportunity to deliver our vision for the future of Commercial Radio.** Greater freedom to organise how and where content is produced will help to place the industry on a firmer footing and allow it better to compete with other media already enjoying this freedom, as it faces up to the challenges of a fast changing world. It will also help to support our shared vision for a digital future which, for radio, has the potential to deliver much greater diversity of choice; effective competition at a national level with the BBC and more investment in content following an end to dual transmission costs. Our vision, which was

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[1] See Annex A for full details of members of the RadioCentre Board and PASC
[2] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.2
[3] See Annex B, Value Partners, 'Economic Modelling of Commercial Radio', August 2009
[4] Ofcom 'Media Ownership Rules Review', July 2009

presented to the Government as part of the Digital Britain process, encompasses the needs of listeners, advertisers and industry and is summarised below.

- Commercial Radio to deliver the majority share of radio listening in Digital Britain
- With three strong tiers of listener choice:
  - Strong national brands to compete with 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 and community services in smaller towns on either digital or FM, as they wish.
- Via new content, innovative programming and interactivity
- Which, as a consequence, re-engages advertisers' passion for radio and grows our revenues, fuelling further investment in content

7. **For Commercial Radio to thrive we believe that there must be a more radical reappraisal of how radio is regulated.** The changes to regulation that flow from Digital Britain report are welcome, but ultimately they are only stepping stones towards how we believe the industry should be regulated in future. We have argued for some time that radio regulation is too focussed on measuring the inputs into services, rather than their output as received by listeners. Our vision is for radio to be assessed and regulated purely on these outputs, with a particular focus on local news and local relevance, but removing the 'micro' regulation on how and where content is produced as well as prescriptive music formats.

8. **However, in the meantime, we have engaged on the substance of the current proposals**. We recognise that our vision of radio regulation will take time to deliver. Therefore we have offered detailed comments on the current proposals for regulatory changes which can be achieved in the coming months. These fall into two categories - those that *do not* require legislative change and those that *do* require legislative change.

Proposals that *do not* require legislative change.

- Proposal 1 – We agree that regional stations that are on digital should be able to share programming to become UK-wide stations, but believe that this should also be an option for certain local stations. We also call for a greater degree of flexibility over the way in which 'national' coverage is assessed, before questioning the extent to which stations in Scotland and Wales should be exempt from gaining additional flexibility and are instead required to continue to be nation-focussed.

- Proposal 6 – We support the principle that, so long as stations deliver enhanced local news coverage, they could be permitted to produce fewer locally-made hours of programming. However, we do not believe the level of hours reduction proposed makes this an attractive opportunity for stations. We make an alternative proposal.

- Proposal 7 – We welcome the removal of obligations on AM stations to produce locally-made content or carry local material, but disagree they should continue to be required to produce output in the nation where they are based.

- Proposal 8 – In response to Ofcom's invitation to make specific proposals about the future regulation of music formats, we propose a new simplified structure, which recognises the need for diversity, Ofcom's obligations in that regard and the

desirability of giving stations more flexibility in order to serve listeners better. We look forward to engaging with Ofcom shortly on the detail of this proposed structure, with a view to implementing changes as soon as possible.

Proposals that _do_ require legislative change.

– Proposal 2 – We welcome the proposals to create a second national multiplex, but believe that this must be achieved through multiplex owners reaching an agreement on the precise method to achieve the proposed outcome, rather than any solution being imposed on the industry.

– Proposal 3 & 4 – We welcome the additional flexibility to co-locate and programme share. While we recognise, and are prepared to work with, the map of mini-regions proposed by Ofcom we would like to see the criteria broadened to enable more stations to have the opportunity to pursue this approach, should they so wish. We suggest that, rather than being restricted to locating only within their own mini-region, stations should also have the flexibility to co-locate within any adjoining region. This will mean they are not being restricted due to an arbitrary line on a map, the so called 'hard border syndrome'.

– Proposal 5 – We support the powers to enable local multiplexes to merge, but, as with Proposal 2, we highlight the need for multiplex owners and the industry to reach any necessary agreement and develop the precise methods to achieve the proposed outcome, rather than any solution being imposed on the industry.

Radio in Digital Britain – strategic context

9. RadioCentre welcomed the key recommendations concerning radio in the Digital Britain Final Report, which provide the policy background to this consultation and outlined the nature of the some of the deregulatory changes that the Government deemed necessary.

10. However, the most significant change for radio outlined in Digital Britain was the proposal to move towards a 'digital radio upgrade' for national, regional and large local services. This upgrade is proposed for a single date, which will be announced at least two years in advance. Included within the upgrade timetable is an intention that key criteria should be met by the end of 2013 (i.e. when 50% of listening is to digital; when national digital coverage is comparable to FM coverage, and local digital radio coverage reaches 90% of the population).

11. We also support the retention of FM for smaller local radio stations, which should include the smaller commercial stations as well as the community radio sector, for whom transmission on digital is unavailable or unaffordable due to the nature of digital multiplexes. Defining the nature of this is becoming increasingly urgent for smaller commercial operators that need ongoing security about their broadcast platform and business-model in order to secure investment and their continuing viability.

12. Indeed some of our members that operate these smaller stations are expressing a desire to move their stations to digital radio, at their current size. As such, they will need the flexibility to allow this, as well as enabling those stations to remain on FM, where desired.

13. The reforms to localness regulation outlined in Digital Britain followed on from the Myers Review[5]. This review examined the current regime and made a number of recommendations to help secure the provision of local content while reflecting the economic realities of local markets. The Digital Britain Final Report broadly accepted the need for these reforms and proposed the measures which are the main subject of this consultation.

    – Support for the recommendation of greater flexibility to co-locate stations, within a new map of mini-regions.

    – Commitment to work with industry to improve the viability of the digital platform and enabling the merger of regional multiplexes to create a second national multiplex.

    – Reducing locally-produced hours in return for an enhanced local news commitment.

14. These changes along with the other deregulations outlined in Digital Britain were supported by RadioCentre as part of the continuing (albeit gradual) move towards assessing and regulating based on the output of stations, rather than its inputs, such as how and where it produces its content. This was summarised by the Government's position in Digital Britain Final Report when it stated "*we agree this regime should include a greater focus on the output, or more precisely the impact of local stations*".[6]

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[5] John Myers, 'An Independent Review of the Rules Governing Local Content on Commercial Radio', April 2009
[6] Digital Britain Final Report, p.100

15. The proposed two-year pilot of a new output focussed regulatory regime is central to this approach and we look forward to engaging with Ofcom and DCMS on the details of how such a system could work in practice, and the role that the stations themselves could play in defining obligations and delivery of localness. We intend to facilitate this pilot and its speedy commencement.

16. However, the measures being proposed do only represent a very gradual movement particularly since Ofcom stated an intention to adopt this approach as long ago as 2005 and again more recently in 2007, where it stated that *we confirm the move from the regulation of inputs to the regulation of outputs*[7]. Yet this consultation, which is taking place only two years after the conclusion of the 2007 Future of Radio review, still only proposes incremental changes towards a genuine regulation of outputs.

17. Commercial Radio, on the other hand, believes there should be more radical changes to the regulatory framework and that we should move more quickly towards an assessment of impact on audiences. This difference in approach has meant that Ofcom has faced some considerable criticism from our members and others for outlining detailed proposals that do not at this stage provide the fundamentally new approach that is required[8]. Some commentators within the sector have even called into question Ofcom's commitment to delivering real change and a bold vision for the future of radio, accusing it of scepticism and reluctance due to the way in which many of the proposals in the consultation document are presented.

18. However, RadioCentre acknowledges that, in a number of cases, these measures are yet to receive parliamentary approval. Therefore we recognise the need for due process and believe that any reluctance that may be read into the consultation document may be a case of procedural caution being adopted by Ofcom, rather than a perceived unwillingness on behalf of our regulator to free Commercial Radio from the stifling level of regulation that was created to deal with an analogue world. We trust this is the case. As a consequence we welcome the opportunity to work with our regulator in moving as quickly as is possible to implement these deregulatory changes, and hope that there is still a significant opportunity to amend the proposals that are contained in the consultation document.

19. We propose that our comments, along with those of the other important stakeholders that respond to this consultation, form the basis of a more detailed debate and discussion in the coming months as final decisions are reached.

20. We understand that Ofcom does not intend to publish detailed findings from this consultation until the Digital Economy Bill receives Royal Assent. However, we believe that Ofcom should implement its decisions in areas of this consultation *not* dependant on legislative change at the earliest opportunity. Those elements of the consultation that do require legislative change can then be concluded once the Digital Economy Bill is at its advanced stages, as originally proposed by Ofcom.

21. In summary, we would therefore invite Ofcom to initiate discussions with the industry as soon as this consultation has closed, to bring clarity to the areas where legislative change is required (localness definitions, multiplex planning) and, where legislative change is not required (requirements on regional/ national stations, enhanced local news, music formats), to expedite implementation.

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[7] Ofcom 'Radio – Preparing for the Future. Phase 2: Implementing the Framework', October 2005, p.3
[8] http://www.guardian.co.uk/media/2009/jun/30/ofcom-former-gmg-radio-chief-exec

Localness on radio

22. In the consultation document, Ofcom considers evidence from consumer and industry perspectives about its proposed changes to regulation. It devotes particular attention to attitudes about localness on radio in particular. In this section, we offer our views on this important topic.

23. Against the background of our desire for deregulation it is important to understand that Commercial Radio remains committed to localness and agrees with the Myers Review that *"the 'localness' of a local radio station can only become a more important way for it to distinguish its product from competitors in the future Digital Britain"*[9]. This remains an essential part of radio's appeal and central to the way in which it is able to differentiate itself in a crowded marketplace. Therefore it would be wrong to imply that the desire to see regulatory relief for the radio industry stems from a reduced commitment to localness.

24. However, it is not regulation that secures Commercial Radio's commitment to localness, it is the ongoing commitment of the stations, which should have the ability to provide news and local information in a manner that is most relevant to their listeners in their area. A recent survey of RadioCentre members found that even with no regulation whatsoever 86% of stations would retain the same local news output. In addition, three-quarters (75%) of stations already provide more than the 7 hours locally made content Ofcom's localness guidelines dictate, including 65% of stations that broadcast local news at least hourly for 12-13 hours every weekday)[10].

25. Ofcom's recent localness monitoring of eight local commercial stations[11], conducted in January 2009, supports this understanding. It found that all monitored stations provide travel and weather, despite this not being demanded to do so by the stations' formats or Ofcom's localness guidance. In addition, whilst all stations are required to provide a certain number of hours of locally-made programming each day and an appropriate amount of local material, *"stations choose to deliver localness in a number of different ways"*. Some see localness as a programme 'driver', whilst others preferred a lighter approach; the adopted approach *"depended very much on the character of the particular service and was calculated to feed that character delivery"*.

26. Whilst we agree that the current radio market has been shaped by the push towards greater consolidation in recent years, it is simplistic and inaccurate to link this to an inevitable drift away from local content. Consequently, it is somewhat misleading for Ofcom to state simply that *"thirty years ago each commercial radio station was independently owned, but today, consolidation has meant that the sector is dominated by three companies which command 77% share of all commercial radio listening"*[12], as if this is part of the inevitable dilution of local content. While this statement is factually correct it gives a misleading impression of the way in which the Commercial Radio industry was structured in the past and is preparing for the future.

27. While stations were indeed independently owned in the past, the proportion of listening share was still dominated by a relatively small number of owners. For

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[9] John Myers, 'An Independent Review of the Rules Governing Local Content on Commercial Radio', April 2009, p.59

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

[11] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, Annex 9. The eight monitored stations were chosen to represent a cross-section of the Commercial Radio industry.

[12] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.20, para 5.3

example, in 1973, only three local commercial stations were licensed and therefore dominated 100% of the market between them. Even by 1980, when 19 commercial stations had been licensed, listening was by no means even and inevitably reflected population density among other factors. As a result the top three owners of stations in 1980 accounted for 46% of listening and the top four for over half (54.7%)[13]. Therefore it would be wrong to imply that the Commercial Radio sector previously constituted only of small independent companies with limited influence and audience share.

28. What is indisputable however is the importance of a level of localness on Commercial Radio for citizens and consumers. Yet measuring this desire for 'locally-relevant' material as opposed to the relative importance of this content being 'locally-made' is a problematic concept which depends very much on the questions being asked and how they are framed.

29. **We would question the value of consumer research that asks listeners for their views on *how* or *where* local content should be produced in the digital age.** To receive informed answers to such questions would require respondents to be conversant in modern radio production techniques and the various ways that local content can be provided, as well as how production techniques can impact on the relevance of material. This is clearly an unreasonable expectation. To attach significant weight to feelings rather than fact is simply an inappropriate means of determining regulatory policy.

30. For instance Ofcom quotes research conducted in 2007 which found that "*nearly all listeners <u>felt</u> that the quality and relevance of local traffic/ travel reports, and local news and weather bulletins, were enhanced by being locally-made and broadcast by local people*"[14] (our emphasis).

31. While this initially appears to provide a compelling reason to continue to seek to maximise locally-made content broadcast by local people, it is actually made clear from the emphasis added that this is based on an assumption *felt* by listeners, who would be highly unlikely to be aware of the location of the station or the origin of its presenters. Instead their views are more likely to be influenced by the instinct (which is reinforced simply by posing the question) that local content should, for some reason or another, be locally-made or broadcast by local people.

32. Recent RAJAR audience data reinforces that it is not reasonable to place such weight on listeners' 'feelings' in this way: the 18 local stations rebranded to Heart in January and March 2009 showed year on year growth in reach of 10% and year on year growth of 23% in total listening hours[15]. This was despite the move away from a perceived 'local' name to a national brand name, which many had argued would detract from the feeling of localness. The actual localness of the stations has of course remained as they have continued to deliver local news, traffic & travel information.

33. Therefore, understanding listeners' views on the importance of locally-made programming (rather than material of local relevance) is more complex than simply asking them. It involves asking consumers to consider matters which do not necessarily directly affect the content they consume, and therefore asks them to make these assumptions about the impact of stations' operational decisions on the

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[13] RSGB/ JICRAR 1980
[14] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.25, para 5.25
[15] RAJAR, Q2 2009

output they hear. This is difficult for the listener to do without the benefit of actually hearing the results of different approaches.

34. RadioCentre sought to examine these issues in 2007 as part of the largest ever survey of Commercial Radio listening, called The Big Listen[16]. This sought to separate the issues of locally relevant content and where content is produced. It found that only 17% of people opposed the statement "*I like radio stations that provide information about my local community*". In addition 53% of people agreed that radio keeps them in touch with their local community and 79% agreed that radio gives them local news and information.

35. Most crucially, listeners were also asked whether they cared where programmes are made, so long as they contain relevant local material. This revealed that 61% of respondents agreed that "*As long as my local station gives the information I need, I don't mind where it is broadcast from*". This response, from a clear majority of listeners, is much more revealing than any assessment about how and where they *feel* local material should be produced. The independent RAJAR results referred to in paragraph 32 supports this.

36. In interpreting its own monitoring of stations, Ofcom also draws some illogical conclusions. For example, although it correctly highlights the way in which local information is enhanced where a presenter is able to add local knowledge of the areas being covered, it then inappropriately concludes that "*for local authenticity to be maintained at least some of the generation of content will need to be located in the area*"[17].

37. This again conflates the separate issues of local content that is relevant to the listener and the role of location in delivering this output, and is based on a number of problematic assumptions. In particular, it assumes that local knowledge is somehow innate in presenters just because they are broadcasting from a particular area.

38. It is important to differentiate a presenter's physical location from the quite separate attribute of skill of communicating local knowledge. To turn the principle on its head, a radio station would not assume that, just because a new presenter from another area has moved house to live in the area, s/he will instantly provide locally relevant information on air. Instead, the station will imbue that presenter with local knowledge.

39. Therefore, it is simplistic to assume that locally relevant content will be broadcast simply by virtue of a presenter being located within an area. A number of stations (including Heart, Galaxy and Bauer's Big City Network) provide local content by way of split links during networked programming, content that is researched and prepared by local individuals but delivered by a top class presenter. There is no evidence from RAJAR that listeners necessarily prefer an approach that is wedded to local production, rather than an emphasis on local relevance.

40. We note that, beyond this inappropriate conclusion, and an inappropriate weight given to listeners 'feelings' about production techniques, Ofcom has not investigated the relative merits of different production approaches to providing localness. In contrast, our members have a wealth of different experiences.

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[16] 'The Big Listen' research conducted as part of RadioCentre's response to Ofcom's 'Future of Radio' consultation, June 2007
[17] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.29, para 5.40

41. Worryingly, there is also an assumption in the questions posed that localness and viability are mutually exclusive[18]. While we recognise the value of amending the localness regulations to improve viability (because they will focus less on prescribing how this output is provided), we do not accept that this will inevitably dilute locally relevant material.

42. In our view it is time to step away from narrowly defined input based regulation and start to consider the options for measuring the output, or more accurately the impact, of local radio. That is why, as noted earlier, we welcome the proposal that Ofcom and DCMS will work to develop a two-year pilot of a new output focussed regulatory regime and why we offer our full engagement with that process.

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[18] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.28, para 5.33-4

Ofcom's detailed proposals

43. We address each of Ofcom's proposals in turn, focusing initially on those changes that would not require legislative change and could be implemented (in whole or in part) by changes to Ofcom's localness guidance and format regulation, so could therefore be implemented immediately.

44. We then comment on those proposals that would require legislative change through the upcoming Digital Economy Bill. We welcome the fact that Ofcom is consulting on these measures now, enabling their speedy implementation as soon as the Bill is passed. However, we believe that the amendments we suggest are crucial for the changes to have the desired impact.

45. We have therefore organised our comments in the following sections below:

Proposals where a change of legislation *is not* required

- *Proposal 1 – regional stations allowed to share programming to become national stations*

- *Proposal 6 – an enhanced news option for local FM stations*

- *Proposal 7 – AM stations*

- *Proposal 8 – limited redefinition of contemporary Formats*

Proposals where a change of legislation *is* required

- *Proposal 2 – creation of a new national multiplex from existing regional multiplexes*

- *Proposal 3 & Proposal 4 – co-location within a new set of defined areas / programme sharing within the newly defined areas*

- *Proposal 5 – mergers of local multiplexes*

PROPOSALS WHERE A CHANGE OF LEGILSATION *IS NOT* REQUIRED

Proposal 1:

Regional stations allowed to share programming to become national stations

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46. RadioCentre supports the encouragement of new UK-wide services and the prospect of enhanced choice and competition on a national basis. This is consistent with our vision of the future shape of the radio industry and the opportunities we outlined to Government as part of the Digital Britain process.

47. Ofcom's approach to enabling more national commercial stations can be summarised as:

    – Option A – Status quo, which would be unlikely to deliver the development of national radio services.

    – Option B – Removing local obligations in return for carriage on a national digital radio multiplex.

    – Option C – Removing obligations with no requirement for national digital carriage.

48. Ofcom's clear preference is to pursue Option B in shaping its proposal to share programming, remove localness requirements and become national stations.

49. **We agree with the spirit of Ofcom's proposal, but believe that amendments to the detail of its implementation would be appropriate**.

50. **Firstly, the industry requires a more workable definition of what would constitute a national network in future**. The consultation document appears to take the view that stations should be tied to carriage on a specific national digital multiplex (currently only available via 'Digital One'). The Myers Review instead proposed that the appropriate level of coverage was being available on digital to more than 65% of the UK population.

51. Consequently RadioCentre believes that that Ofcom's condition of carriage on a national multiplex is too restrictive. We also note that it effectively constitutes 'input' regulation by seeking to prescribe the means of achieving coverage rather than the coverage itself.

52. We believe that the Myers approach (more than 65% of the UK population) is more appropriate and that the level of coverage achieved should be the trigger, regardless of the multiplexes that are actually used.

53. To ignore this more flexible approach, and insist on full national coverage before providing stations with the opportunity to benefit from this deregulation, would dramatically reduce the potential for this proposal to have a genuinely positive impact on listener choice. It will also limit the industry's ability to invest more in content and compete more effectively with the BBC, as envisaged in Digital Britain.

54. Our proposed approach would also enable stations to grow outwards from their existing carriage agreements on local/regional multiplexes (many of which have many years left to run) rather than having to wait for these to expire. Finally, it would allow

stations to go 'national' via a regionalised model, thus allowing for the retention of local and / or regional revenue, upon which many of these stations depend.

55. **Secondly, we believe it is wrong that Ofcom seeks to restrict the application of this proposal to its current list of 'regional' stations.** This is ironic since Ofcom itself recognises that there is no statutory definition or distinction between these and other large independent local radio (ILR) stations. This is overly restrictive and anomalous.

56. Ofcom should instead allow 'local' stations that already share a brand with 'regional' stations to be part of this proposal. This would specifically assist stations such as Galaxy and Smooth that are logically part of regional brand even though, in places such as Glasgow they are not theoretically 'regional', but would exclude local heritage stations (such as Heart) that are predominantly made up of local licences.

57. Without this provision, the incentive for many of these brands to grow is again simply not there, because part of their network would be included in the new provisions and part would not be.

58. **Thirdly, we question the proposal that specific nation-based focus of regional stations should be enshrined within the regulatory framework**. Ofcom cites the example of stations such as Real Radio, which *"have made a strength of their regional content and effectively become quasi national stations within their home nation"*[19]. Clearly, having generated such "strength", these stations are very likely to continue to produce local content, although the precise nature of how this is provided will depend on a range of factors, such as the availability of a North and Mid Wales multiplex in the case of Wales. However, we believe it should be their decision so to do.

59. The danger is that Ofcom's proposal would make the same requirement of music-based services for whom national identity may be less crucial. Because operators would therefore have a strong disincentive to create a genuine UK-wide brand, the unintended outcome of Ofcom's proposal is that listeners could be denied the very national radio choice that the proposal seeks to secure. Instead this will further restrict the ability to provide UK-wide services to compete with those UK services of the BBC, Radio 1 and 2.

60. We therefore recommend that the matter of nation-focus should be one for stations to determine.

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[19] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.37

> **_Proposal 6:_**
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> **_An enhanced news option for local FM stations_**

61. As we have stated, we do not believe that it is appropriate to seek to secure the provision of local material, which is of primary importance to listeners, through quotas on locally-produced programmes. Stations operate in a range of varied and complex markets and need to be free to find the best means of serving their listeners whilst being sufficiently financially robust to invest in their digital future.

62. Consequently **we support an increased focus on material that listeners value, such as local news, rather than assessing where programmes are made**. Ofcom's own independently commissioned research has found that consumers identify core, functional local content, such as local news, travel and weather as being most important to them[20].

63. As a result Proposal 6 constitutes a welcome step in the right direction, providing the ability for stations to opt for a reduction in locally-made programming, if they provide a greater quantity of local news in daytime. This gives listeners what is important to them, whilst simultaneously freeing the station from unnecessary burden. Although we reiterate that many stations provide well in excess of these minimum news requirements and would continue to do so irrespective of regulatory change.

64. However, we question whether the reduced thresholds of locally-made programming that are proposed provide sufficient incentive for stations to increase their news output. Ofcom proposes:

    – Where local news is at peak times only – 10 hours of locally-made programming during weekday daytimes (including breakfast) and 4 hours at weekends in daytime.

    – Where local news is at least hourly in weekday daytime and weekend peak (the enhanced news option) – 7 hours of locally-made programming during weekday daytimes (including breakfast) and 4 hours at weekends in daytime.

65. We think a different approach should be taken.

66. We observe that, where a station is required to provide 10 hours of locally-made programming out of 13 daytime hours the trend has often been towards two 5 hour shifts with a 3 hour networked show. We would argue that in general 5 hour presentation shifts are not in the listeners' or presenter's best interests. Moreover, the infrastructure needed for a 3 hour networked show is the same as a 4 hour show. Therefore, by reducing the requirement to 7 hours, the local provision could be made up more logically of two local shifts (3 hours and 4 hours say) and one networked 4 hour shift. This is likely to produce both better programming and make best use of the possible networking savings.

67. Similarly, where a station commits to increased local news provision, a requirement of 7 hours of local programming is likely to be covered by two shifts in the same way as 10 hours often are now – with no real savings and therefore no real incentive to opt for the enhanced news option.

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[20] '*The Future of Radio: Localness',* produced for Ofcom by Essential Research, 22 November 2007

68. **Consequently we propose that, in order to provide greater incentive to increase stations' commitment to local news through real savings whilst simultaneously providing a higher quality output, the following should apply:**

    – **Where local news is at peak times only – 7 hours of locally-made programming during weekday daytimes and 4 hours at weekends in daytime.**

    – **Where local news is at least hourly in weekday daytime and weekend peak (the enhanced news option) – 4 hours of locally-made programming during weekday daytimes and 4 hours at weekends in daytime**.

69. **We also propose that stations should be free to schedule their locally-made programming <u>at any time during daytime</u>, and that they should not be compelled to include it at breakfast time**. This distinction would be a further step away from regulating inputs of commercial stations so definitively and attempting to micro-manage their output.

70. Instead it would provide the opportunity to deliver enhanced news and local material in different ways, across whichever part of the daytime was considered appropriate, giving stations the flexibility to achieve the best mix for their local area, whilst also preserving Ofcom's preferred proxy of locally-made programming in daytime but in a less prescriptive way.

71. There is simply no logic to insisting that breakfast forms an essential part of the locally made hours. It is an outdated approach tied to a time when breakfast was the predominant peak listening time. This is no longer the case across so many stations. We have analysed RAJAR audience data[21] for over 300 stations in the UK broken down by daypart i.e. breakfast (6am-10am), morning (10am-1pm), afternoon (1pm-4pm and drivetime (4pm-7pm). We found that 28% of stations enjoyed their peak audiences outside of breakfast. Breakfast was the clear leader in audience terms (with a reach at least 10% higher than any other daypart) for only 59% of stations. It is clearly true that breakfast remains an important time for radio listening but the data clearly show that it is a gross over-simplification to argue that it is the most important time of day for all stations.

72. Therefore, stations should have the freedom to decide, within the confines of daytime, when to schedule their locally-made programming.

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[21] RAJAR, Q2 2009

Proposal 7:
AM stations

73. Ofcom recognises that listening to local commercial AM stations is continuing to decline, and that these stations would benefit from regulatory relief. This results in the proposal to remove the remaining requirements on AM stations to produce locally-made programming or carry local material, which we support.

74. However, Ofcom proposes to retain the requirement for 10 hours during weekday daytimes to be produced within the nation where the station is based. There is an uncharacteristic lack of evidence or argument as to why this is appropriate.

75. In our view all AM stations should now see such requirements removed in order to reflect the changes in the market and in AM listening. While we recognise that there are understandable sensitivities within the devolved national assemblies and governments regarding any proposed removal of these requirements, we do not believe it is appropriate to retain yet more burdensome input regulation on the sector in this way. Moreover, we firmly believe that the demand for local content for the Nations will continue to be met, through the combination of other measures that are under consideration and form part of this response.

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Proposal 8:

Limited redefinition of contemporary music Formats

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76. The development of simplified music formats for Commercial Radio, rather than a detailed 'Promise of Performance', has represented a positive change that has reflected a gradual move away from the regulator being overly prescriptive in defining a station's music output.

77. However, the very existence of station specific music-focussed formats as a means of defining the character of local Commercial Radio services, has become an outdated concept in recent years and is likely to seem even more so in future. Not only do these formats limit the ability of stations to react to the demands of listeners and innovate or change content, but music styles and genres have also become increasingly difficult to define while listeners are demonstrating increasingly diverse tastes and expectations. Listeners no longer define music by the sort of categories that formats use.

78. We agree with Ofcom's analysis that *"the genres into which popular music has previously been categorised have become blurred"*[22]. We therefore believe that there is a strong case for further simplification of music formats with less emphasis on music output as a means of defining the characteristics of local Commercial Radio services. This was the approach broadly outlined in the Myers Review[23].

79. Ofcom seeks views on whether 'contemporary and chart music' and 'adult contemporary' formats be should combined into a single 'broad music' format. We agree it should. However we believe that it would not be fair or proportionate to simplify these formats alone. We therefore consider that all types of analogue licences should be able to benefit from the simplification of formats. Furthermore, Ofcom notes that over 70% of licences would fall into a new 'broad music' category, and in our view it would be wrong to retain a more restrictive form of regulation for the minority 30% of licences, simply because they do not fit a 'broad music' format. We do of course recognise the need to preserve diversity and Ofcom's statutory obligations in this regard.

80. We believe there are a number of benefits for listeners, operators, Ofcom and the wider music industry from further simplification of music formats:-

    – The popularity of different genres of music amongst different demographic groups changes over time. The introduction of truly portable music, through devices such as the iPod, mean that consumers are now able to have their entire music collection with them at all times, giving them what they want, on demand. Simplifying music formats would increase operators' flexibility to respond to these changing tastes and continue to engage with listeners evolving desires.

    – Listeners' music tastes have not only shifted between genres, they have also become increasingly wide and diverse, with the majority of listeners now claiming to 'love' or 'like' a range of different clusters of music genres (often depending more on mood and time of day). Increasing stations' flexibility to play music from

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[22] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.72
[23] John Myers, 'An Independent Review of the Rules Governing Local Content on Commercial Radio', April 2009, p.85-86

a range of genres of music can be expected to increase the stations' appeal, and enhance, rather that reduce diversity.

− There are many inconsistencies between current music formats, often the result of history going back many years. Many existing formats already provide operators with substantial flexibility, for example the format for Galaxy Scotland did not change when the station was rebranded from Beat 106 to XFM Scotland in 2006, or when it was rebranded in November 2008 to Galaxy Scotland. Yet other stations' current formats would not permit such changes to the output of the station. There is therefore a strong argument on grounds of consistency and fairness to simplify music format regulation. We recognise that stations' formats were part of the original licence application, but we believe that the time is now right, as the industry prepares for digital radio upgrade, to address these differences and apply a consistent, simplified set of rules across all analogue licences.

− Simpler music formats would enable operators to make best use of the spectrum licensed to them and are therefore also consistent with Ofcom's general duties to optimise the use of available spectrum and its stated commitment to regulatory simplification. We note Ofcom's view that *"at present there is no compelling evidence either way"*[24] on the question of simplifying music formats. Our view is that, if there is no evidence of a need for the current prescriptive music format regulation then the regulation should be simplified, in keeping with Ofcom's light-touch and evidence-based approach to regulation.

− If structured appropriately, we do not believe that simplifying music formats would lead to stations clustering around the commercial 'middle ground'. In an increasingly competitive media market there are strong commercial incentives on operators to deliver distinctive and differentiated services to both listeners and advertisers. This is re-enforced by the consolidation of the Commercial Radio industry in recent years, it being recognised that an operator of multiple stations in the same local area has an even stronger incentive to ensure the services are differentiated and appeal to different audiences.

− Simpler formats would also allow Ofcom to focus on radio station outputs rather than the detail of individual licence formats.

− Simpler, more flexible formats would also make it easier for stations to play a wider variety of music overall, with benefits for listeners and the wider music industry.

81. Nevertheless, we also recognise that Ofcom is currently obliged to meet a number of statutory requirements when proposing to simplify music formats, including a general duty to secure a wide range of services[25], as well as the range and diversity of local services[26] and recognise the need for Ofcom to be sure that this will be preserved under and new proposals. Consequently we are not calling for the complete removal of music formats.

82. Instead we believe that simplified music formats, if properly structured, are fully compatible with Ofcom's statutory obligations to secure a wide range of services which appeal to a variety of tastes and interests. Indeed, we would argue that

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[24] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.73
[25] Section 3(2) Communications Act 2003
[26] Section 85 (2)(b) Broadcasting Act 1990

excessive and unnecessary restrictions on operators' flexibility to improve services has the potential to limit diversity and reduce overall quality.

83. Ofcom's approach to issue is unique (within this consultation) in that it does not make a specific proposal at this stage, but does float a very specific option: the potential combining of the existing definitions of 'contemporary and chart music' and 'adult contemporary' into a single 'broad music' definition. This clearly represents a welcome step in the right direction.

84. However, **we believe that as the industry prepares for digital radio upgrade, the time is right for a more fundamental review and, in response to Ofcom's invitation to comment in its approach** we outline below our overall vision for the future of Commercial Radio formats.

85. We propose a clear and straightforward approach to meeting the statutory requirements for diversity and character of service, which will benefit listeners by offering stations the flexibility to adapt to changing tastes and musical styles, based on five categories of station format:

Band	Description
A	Speech service
B	Specialist music service, targeting a younger 15-29 audience
C	Broad music service
D	Specialist music service, targeting a more mature 35+audience
E	Speech and broad music mix

86. In our proposal, stations would be free to change their type of output, though only within the confines of their designated band, without seeking a detailed format change and approval from Ofcom whenever they wish to do so. These five bands of service would secure diversity across the radio market, but would promote flexibility within it.

87. By way of example, under our proposal, the following formats would apply.

– The format for Kerrang! in the West Midlands would be 'A SPECIALIST MUSIC-LED SERVICE TARGETING 15-29 YEAR OLDS' (Band B). This would replace the current format, 'A SPECIALIST ROCK MUSIC SERVICE MIXING MODERN & CLASSIC ROCK (PLUS SOME COMPLEMENTARY TRACKS SELECTED FROM GENRES APPRECIATED BY ROCK FANS) WITH STIMULATING SPEECH, ESPECIALLY AT BREAKFAST, FOR YOUNG ROCK AFICIONADOS. IDENTIFIABLE SPECIALIST MUSIC PROGRAMMES FEATURE FOR AT LEAST 40 HOURS A WEEK'. The new format obligation would of course be in addition to localness and news obligations but the same simplified format would also apply for other specialist music stations targeting a younger audience e.g. Galaxy Yorkshire, Kiss in East Anglia.

– The format for Gold Bristol would be 'A SPECIALIST MUSIC-LED SERVICE TARGETING 35+ LISTENERS' (Band D) in place of the current format 'A CLASSIC POP HITS STATION, WITH LOCAL INFORMATION, TARGETED PRIMARILY AT 35-54 YEAR-OLDS IN THE BRISTOL AND BATH AREA'. The same simplified format would also apply for other specialist music stations targeting an older demographic e.g. Smooth FM.

88. While enabling a station to make changes to its output without reference to the regulator, this structure would prevent a service licensed to target an older audience seeking to target a younger audience more demanded by advertisers, or moving to the 'popular middle ground' and would therefore protect diversity and remain consistent with Ofcom's statutory obligations. In such cases, where the format is changing so significantly that the station would be seeking a move from one category to another, we believe that this would require the station to follow the existing format change process including approval from Ofcom and public consultation where appropriate.

89. This approach would ensure diversity and provide the possibility of greater flexibility for stations, but we believe that this approach will also provide Ofcom with a simpler way of assessing the provision of different types of radio services for the fullest range of radio listeners.

90. We believe the simplified formats should be applied across the industry following the same process as was used for the simplification of formats which occurred following Ofcom's 'Future of Radio' review, i.e. that any public consultations would be at an industry-wide level rather than on a station-by-station basis which we do not believe would be desirable or practicable.

91. We note Ofcom's desire for further evidence and over the coming weeks we wish to engage with Ofcom to provide further evidence of why this structure is appropriate with a view to implementing it as soon as possible.

PROPOSALS WHERE A CHANGE OF LEGISLATION *IS* REQUIRED

Proposal 2:

creation of a new national multiplex from existing regional multiplexes

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92. We welcome the possibility of a second national regionalised digital multiplex (or 'D2') that would provide the prospect of more national services but with the additional flexibility to offer regionalised opt-outs for advertising and programming if appropriate. Therefore, **giving Ofcom the power <u>to enable</u> the six existing regional multiplexes (plus one of the three London multiplexes) to combine and extend their areas create the prospect of a multiplex with national coverage is welcome**.

93. However, we raise a few small notes of caution about the implementation of this proposal. Firstly, the powers to enable multiplexes to combine must be seen primarily as the removal of a potential obstacle, rather than the creation of an obligation on multiplex owners to act in a way that is prescribed or imposed by Ofcom or Government. Ultimately any action to implement the potential combination of these multiplexes must be a result of industry proposals that are agreed between the multiplex owners, who must retain the flexibility to come to appropriate commercial arrangements.

94. A second (and related) issue is the level of geographic coverage that is ultimately provided. We agree that the creation of a full national regionalised multiplex is the right objective and the industry will seek to enable this to happen. However, in the short to medium term, it may not be commercially viable to build out D2, so there should no obligation to deliver this is a prescribed way, or seek to make this a pre-condition for the other regulatory changes being proposed by Ofcom to occur.

95. This should not be read as a lack of commitment from the industry. We simply believe that it is important to highlight the range of possible outcomes as a result of this proposal and the need to be commercially realistic to avoid repeating mistakes of the past. For example, available slots on local multiplexes could be used to fill any coverage gaps in less demanded areas, with the service line-up varying slightly from region to region as a result.

<table>
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Proposal 3:
co-location within a new set of defined areas

Proposal 4:
programme sharing within the newly defined areas
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96. Arguably one of the most important measures contained in the consultation document refers to the way in which localness on Commercial Radio will be regulated in future. In the Digital Britain Final Report the Government indicated a willingness to support greater co-location of services and redefine what constitutes local radio, to provide economies of scale for broadcasters without significantly affecting the quality of service to listeners. The report stated that *"we have asked Ofcom to consult on a new map of mini-regions which balances the potential economic benefits but also the needs and expectations of listeners"*[27].

97. This approach is welcome in the context of the economic challenges outlined by Ofcom and earlier in this document, and is consistent with our view that localness regulation on radio is in urgent need of reform, due to its narrow focus on inputs within small and unsustainable geographical regions.

98. It is clear from the analysis provided in Ofcom's Figure 15 in the consultation document that while co-location and / or merger of stations may not provide the solution to address the financial difficulties of all stations, it could certainly help to ameliorate the impact of any further significant falls in revenue, particularly for smaller stations (NOTE: we assume that there is a typographical error in this table, whereby the second scenario should demonstrate the impact of a 20% fall in advertising revenues). Therefore any measures that are taken to make this a viable option for a greater number of stations are welcome.

99. Given these demonstrable benefits it is not surprising that there is evidence of a clear demand for co-location and programme sharing among Commercial Radio stations. When RadioCentre asked for the views of its members on this issue we found that a majority (52%) of stations with an MCA of less than 1 million would co-locate with another station if there were no restrictions on being able to do so. Moreover, this would ordinarily be with stations within their region (in 79% of cases where these stations had indicated a desire to co-locate)[28].

100. However, we are concerned that Ofcom has spent a disproportionate amount of time considering options that were not part of the Digital Britain Final Report or the Government's stated approach. The clear recommendation in Digital Britain was for a new map of mini-regions, so we are unsure why Ofcom believes that it is necessary to again consider a full range of regulatory options, as follows.

   – Option A – Status quo

   – Option B – Relaxing requirements on stations below a certain size

   – Option C – A wholly case by case consideration

   – Option D – A map of newly defined areas

   – Option E – Deregulation

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[27] Digital Britain Final Report, p.101
[28] RadioCentre, 'Profitability and localness survey of local Commercial Radio', March 2009

101. For that reason, and although we have stated clearly elsewhere in this document that we would prefer to move more quickly to an output-based approach, we have sought to engage constructively with the concept of a new map of mini-regions within which localness will be delivered.

102. In doing so, we have considered the structures that exist for other media companies. In particular we believe that there is a case for investigating the possibility of aligning the new defined areas for radio with the ITV television regions, or the BBC television regions that were the focus of the Myers Review when considering this question[29]. There would appear to be a consistent logic in applying these existing areas to radio, given that they are already recognised as local areas for the purposes of broadcasting local content, albeit on a different medium.

103. However, Ofcom has adopted a fundamentally different approach, based on areas that were developed for the purposes of digital radio coverage and distribution, and were therefore created for very separate and distinct reasons. In our view it is not necessary (or desirable) for these coverage areas to be linked to a process seeks to safeguard local content.

104. Nevertheless, RadioCentre members have carefully considered how the map could be adapted to make it fit for purpose, so that that it addresses Ofcom's concerns but offers the prospect of real improvements in the flexibility that stations have to re-organise their operations.

105. **We propose that the new map could be retained** **for the purposes of establishing the ability to co-locate or share programming, but** *only* **if the following criteria are adopted:**

    – **All stations will be able to co-locate or share programming within the defined areas (as proposed).**

    – *In addition*, **all stations with an MCA of less than 1m should have the flexibility to co-locate and programme share with a station based in any one of its neighbouring regions.**

    – **Stations will only be allowed to co-locate or programme share within their nation.**

106. If these simple amendments to the criteria can be agreed, RadioCentre believes that the new defined areas proposed in the consultation document could offer the possibility of a workable solution. Importantly, by limiting the additional flexibility to stations with an MCA of less than 1m, the viability of small and medium sized stations will be facilitated but the largest local stations should have no loss of local character.

107. We believe that this approach would provide a much more appropriate level of flexibility, while retaining the essence of Ofcom's suggested model. For example, stations that are on the edge of the defined areas will be able to consolidate operations with nearby stations that are on the other side of a fixed (and somewhat arbitrary) border. So while stations based in the East Midlands region could be seen to have too much choice (with the ability to move across into one of seven neighbouring regions), it is in fact much more logical to allow stations based in areas like North Derbyshire to consider locating or sharing operations with stations that are

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[29] John Myers, 'An Independent Review of the Rules Governing Local Content on Commercial Radio', April 2009, p.73

based in closer towns such as Sheffield (outside the mini-region), rather than Leicester (inside the mini-region).

108. This refinement of Ofcom's proposal is our key recommendation in this area, however, we have some concerns about the apparent need for a process of approving co-location and programme sharing.

109. The consultation document states that *"Ofcom is likely to consent to requests"*[30] for both co-location and programme sharing within the new set of defined areas (subject to meeting licence obligations), with other requests to be considered on a case-by-case basis. This commitment appears to fall a long way short of providing a clear answer for stations which meet the criteria, as to whether the changes they are seeking will be approved by Ofcom (or just considered). We believe that it would be more transparent and objective to state that consent will always be approved, unless the criteria has *not* been met or there is a specific reason relating to licence obligations of the station.

110. Moreover, Proposal 4 states that *"short consultations will take place in most cases"*[31] where programme sharing is requested, whether the stations are in the same defined area or whether the request is being considered separately and assessed against Ofcom's localness guidelines. We are concerned at this extraordinary level of additional oversight, particularly considering the efforts as part of this consultation to identify the correct criteria and present a transparent and objective process. To then require an additional consultation on the implementation of each individual case (even once the rules and procedure have been agreed) seems overly burdensome and unnecessarily duplicative. The industry requires clarity and responsiveness from its regulator, yet this proposed introduction of an additional layer of consultations is not consistent with the drive to implement the deregulatory changes needed to make this a reality.

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[30] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.54, Proposal 3 and Proposal 4
[31] Ofcom, 'Radio: the implications of Digital Britain for localness regulation', July 2009, p.54, Proposal 4

Proposal 5 :

Mergers of local multiplexes

111.	RadioCentre welcomes the powers **to enable** local multiplexes to merge and extend within whatever defined areas are finally agreed.

112.	However, much in the same way as was expressed in the case of the combining of regional multiplexes (Proposal 2), this comes with a provision that this must be seen primarily as the removal of a potential obstacle, rather than the creation of an obligation on multiplex owners to act in a way that is prescribed by Ofcom or Government. Ultimately any action to implement the potential combination of these multiplexes must be a result of industry proposals that are agreed between the multiplex owners, who must retain the flexibility to come to appropriate commercial arrangements.

113.	That said we welcome the proposed changes which enable Ofcom to do this and are broadly supportive of the criteria outlined in connection with this proposal, notwithstanding our different view on the appropriateness of aligning the map of mini-regions for localness with those areas developed for the purposes of digital coverage and distribution.

Conclusion

114. As we have noted the Commercial Radio industry is currently facing a period of great uncertainty and challenge whilst also planning for its digital future. However, the radio sector starts from an immensely strong position with listeners, with UK radio reaching a record 46.3m people or 90% of the population every week[32] and accounting for 27% of the average adult's media day[33]. This level of loyalty and popularity with audiences is built on the great national, regional and local output provided by stations.

115. Therefore we remain positive about the future of Commercial Radio and see the changes that will flow from Digital Britain as presenting a key opportunity to provide an even better service on both a national, regional and local level, while at the same time creating a more sustainable framework to support this stronger and more diverse radio ecology.

116. The proposals that are being considered on localness regulation are at the heart of the current reshaping of the regulatory framework for radio, and these changes are becoming ever more urgent due to the financial challenges facing the industry, as well as the need to grasp the opportunity to shape a digital future for the medium.

117. It is for this reason that we propose Ofcom implement those elements of this consultation not dependant on legislative change as soon as possible. Those elements of the consultation that do require legislative change can then be concluded once the Digital Economy Bill is at its advance stages, as originally proposed by Ofcom.

118. Given that no final public statement is due to be made for some time on those issues that do require legislative change, RadioCentre proposes that it should work closely with Ofcom to facilitate discussions on these issues and looks forward to engaging on the detail of the amended proposals, which we have submitted as part of this response.

119. We would also note (and have stated clearly within this response) that we do not believe that gradual and incremental changes will, on their own, deliver the optimum shape of regulation for radio for the future. That is not to say that the current proposals and their implementation are not important or will not deliver significant benefits, particularly if the amendments that we suggest are taken on board. We simply believe that they are no more than steps on the road to a more comprehensive review focussed on output regulation and the primary importance of maintaining local news provision.

120. Radio must be regulated on what is delivered for the listener. Only by earning the ongoing trust and engagement of our audience will we deserve our place in a Digital Britain. We are determined to achieve that goal and look forward to working with Ofcom and Government as we do so.

RadioCentre, October 2009

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[32] RAJAR, Q2 2009
[33] IPA Touchpoints 2, 2008

RadioCentre

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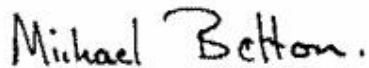**t: +44 (0) 20 7306 2603   f: +44 (0) 20 7306 2505**

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ANNEX A

RADIOCENTRE BOARD MEMBERS

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CEO, RadioCentre

Dianne Thompson,
Chairman, RadioCentre
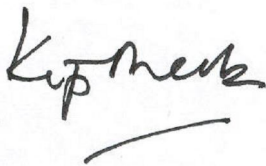
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Steve Fountain	KMFM
Will Harding	Global Radio
David Lovell	Tindle Radio
William Rogers	UKRD
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