

RADIOCENTRE RESPONSE TO DCMS 'SMALL SCALE DAB LICENSING CONSULTATION'

INTRODUCTION

1. Radiocentre welcomes this consultation, which paves the way for a new licensing framework for small scale DAB and provides the prospect of affordable access to digital radio for smaller commercial and community services. With digital listening continuing to grow it is increasingly important that radio stations have the opportunity to broadcast on DAB, ultimately boosting the range of choice and content for listeners.
2. To date, many smaller analogue radio stations (broadcasting on FM or AM frequencies) have been unable to broadcast digitally on the DAB platform. This is typically due to transmission costs that reflect multi-transmitter networks which can make it unaffordable for some operators and the fact that existing local DAB multiplexes often cover much larger geographical areas than smaller stations wish to serve.
3. The evolution of small scale DAB, often based around a single, low-powered transmitter and 'open-source' software multiplex, gives a lower-cost way for smaller stations to broadcast on DAB to smaller areas. The initial assessment of this technology by Ofcom in September 2016 was that the initial trials had been a success, notwithstanding some concerns regarding the power levels and signal strength. Therefore Radiocentre was pleased that an appropriate legislative vehicle was secured to outline the licensing regime.
4. The Private Members' Bill sponsored by Kevin Foster MP in 2017 – the Broadcasting (Radio Multiplex Services) Act 2017 – provided a useful solution to revising the existing legislation in this area (most notably Broadcasting Act 1996). While Radiocentre was supportive of the new legislation, during the passage of the Bill it did raise concerns with parliamentarians about specific elements of the new licensing framework. A number of these concerns remain and are highlighted in this response.
5. Radiocentre has consulted widely with its members and welcomes the opportunity to comment on the key elements that will make up the new legislative order. However, particular concerns have been raised about the overall focus and emphasis that the consultation places on community radio services, potentially to the exclusion of small local commercial operators in some places. We address these concerns in more detail below, but given that a number of commercial radio operators may need to rely on this new technology to secure DAB transmission of their services in future it is imperative that access is not unduly restrictive.

ISSUES NOT COVERED IN THE CONSULTATION

6. Overall the consultation provides helpful clarification on the structure of the proposed licensing framework. Yet there are a number of areas where a lack of detail leaves the industry unclear of the implications of the proposals. Most notably these include the awarding criteria for these multiplexes; the future arrangements for analogue (FM/AM) licence rollovers; and the approach to regulating the proportion of DAB+ services permitted.
7. With regard to awarding criteria, the consultation provides no explanation on the method that Ofcom proposes to apply when it comes to allocate licences to run small scale DAB multiplexes. In the absence of any guidance we can only assume that Section 51 of the Broadcasting Act 1996¹ would be the relevant legislation. This is currently used to determine the award of local radio multiplex licences and will presumably apply in this area unless there are further changes or

¹ <https://www.legislation.gov.uk/ukpga/1996/55/section/51>

amendments to the existing legislation. It will obviously be important for DCMS to clarify this point prior to the small scale multiplexes being advertised by Ofcom.

8. On licence rollovers, DCMS will be aware that local commercial radio stations that simulcast their analogue (FM/ AM) service on a relevant DAB multiplex currently benefit from an automatic renewal of their licence term. This incentive has been in place to support the development of digital radio in the UK, using powers from Part 2 of the 1990 Broadcasting Act (as amended).
9. There is no reference to such an arrangement being in place for local commercial radio stations on small scale DAB. Failure to consider this important factor would seem to be a significant omission, given that it is likely to be an important consideration for some broadcasters in planning the most appropriate method of digital radio distribution in future. Therefore clear guidance on this point would also be extremely helpful.
10. The consultation document is also silent on threshold limits with regard to the number of services broadcasting on DAB+ on a multiplex. DAB+ services on local DAB multiplexes are currently considered on a case-by-case basis by Ofcom (and specifically limited on the second national multiplex). However, in future we believe that local and small scale multiplexes should not be required to secure Ofcom approval in order to carry DAB+ services.

COMMUNITY STATIONS AND SMALL SCALE RADIO MULTIPLEXES

Question 1 – We would welcome views on whether reserving capacity on small scale radio multiplexes for community radio stations is the best way of securing carriage for these types of services on mini-muxes. Do you agree with the principle?

11. The small scale DAB trials, licenced by Ofcom since June 2015, have demonstrated the demand for this new and relatively low cost broadcast technology. Since the launch of the trials in ten locations around the country a range commercial and community services have enjoyed the opportunity to broadcast on DAB and DAB+.
12. It was clear during the passage of the Broadcasting (Radio Multiplex Services) Act 2017 that parliamentarians supported the widespread use of this new low cost transmission technology for small radio stations of all kinds. Proposals for Ofcom to have the ability to reserve capacity for community radio stations would ensure that a limited number of these not-for-profit services are guaranteed carriage on a small scale DAB multiplex.
13. Given the importance that is being attached to ensuring carriage for small radio stations overall, Radiocentre suggests that DCMS should also prioritise reserving capacity for small commercial operators (licensed, analogue broadcasters) that may not otherwise have a viable route to DAB. Without doing so there is a similar risk that valuable local radio services and their listeners could miss out.
14. [Annex 1](#) (attached) lists 99 commercial radio stations that currently only broadcast on analogue frequencies (FM/ AM). Bar a small number of exceptions, the operators of these stations will likely view small scale multiplexes as the only viable path to DAB broadcast platform. Therefore we propose that all such operators should have guaranteed access to carriage on a relevant new small scale DAB multiplex. This offer should be limited to a specific time period only and withdrawn if they do not take it up (in the same way as we propose for community services, below).
15. To be clear, the list of stations within Annex 1 is purely to highlight those not currently on DAB. Individual stations may or may not wish to broadcast on small scale DAB multiplexes and this will ultimately be an operator-based decision.

Question 2 – We welcome views on whether there should be an upper limit placed on the amount of capacity reserved for community radio services. Should this be a single figure applicable across all multiplexes?

16. We can see the attraction of restricting the amount of capacity that is reserved on small scale multiplexes by putting an upper limit in place, as it could help avoid the scenario of other services being prevented from accessing the benefits of this technology.
17. Introducing a universal figure across multiplexes nationwide may be challenging, as demand for access will inevitably vary across the UK. However, some Radiocentre members have argued for an upper limit on reserved capacity for community radio services (set at around 40%) in order to prevent other services being crowded out.
18. Capacity should also be reserved for small commercial operators (such as those listed in Annex 1) with a similar upper limit being applied, in order to ensure that small scale DAB is accessible for all those services that require it the most.

Question 3 – Do you agree with the principle that small scale radio multiplex operators should be able to offer unused capacity reserved for community radio services on a temporary basis?

19. New small scale multiplex operators will wish to run their new services as efficiently as possible, so making the most of capacity taken up by unused reserved spaces for community radio is a sensible approach. However we do not agree that any such unused capacity should be offered only on a temporary basis.
20. It would be unreasonable to expect a broadcaster to use capacity on a small scale multiplex to provide a service and build an audience, but then face the prospect of being forced off air by an operator with a claim to the capacity or spectrum that is being used.
21. Therefore Radiocentre would go further than the recommendations made by DCMS in the consultation and suggests that the right to reserved capacity ought to be forfeited if a radio service does not utilise it during an initial licencing stage. This ‘use it or lose it’ approach should apply to equally to community radio and small commercial radio services.
22. If capacity was later released on a small scale multiplex (for example from a station ceasing or reducing the capacity it uses) those on the reserved list could then be offered first-refusal at the going rate price.

DIGITAL COMMUNITY RADIO LICENCES

Question 4 – We would welcome views on these proposals and on the interaction with the existing community radio licensing regime.

23. Radiocentre supports the introduction of a new category of digital sound programme (DSP) licence for community stations – aligned with the current requirements for analogue community radio licences – that would be known as a C-DSP licence.
24. With regard to the existing community radio licensing regime, we believe that the current arrangements provide too much uncertainty. At present services are able to exploit a loophole where a single service can enjoy the benefits of community radio (on FM/ AM), but can also act in a fully commercial way at the same time by virtue of holding a DAB licence.
25. Consequently, Radiocentre proposes that as part of implementing these changes any DAB licence that is a simulcast of a community radio station on FM should be compelled to move to a C-DSP

licence. This would effectively close the loophole above and provide a greater level of certainty within the industry. Community-based broadcasters could, of course, request to broadcast as a regular DSP licence for a new or different service, but would not benefit from reserved capacity or access the community fund. We look forward to reviewing proposals in more detail when Ofcom consults on C-DSP licences in the near future.

RESTRICTIONS ON HOLDING SMALL SCALE RADIO MULTIPLEX LICENCES

Question 5 – We would welcome views on this approach and whether it deals with the concerns raised about access to small scale DAB radio multiplexes by community radio services.

26. Throughout the passage of the Broadcasting (Radio Multiplex Services) Act 2017, Radiocentre emphasised to parliamentarians the importance of allowing small scale DAB multiplexes to have the option of operating with the support and involvement of commercial partners. Providing the flexibility for these multiplexes to operate in a commercial way is consistent with the approach in a number of the trial areas, and will ensure the engagement of the broadest possible range of stakeholders.
27. If DCMS designed a framework where the only model for operating a small scale DAB multiplex was on a non-commercial basis this could limit the viability of individual multiplexes and present a barrier to growth of the platform overall. Therefore it is right to draw on the lessons from the small scale DAB trials and for future licences to be awarded to both commercial and not for profit entities in a mixed model approach.
28. That said, Radiocentre recognises the genuine concerns about avoiding unreasonably high carriage fees in future. The legislation included specific provisions on this topic and created powers to safeguard access for smaller stations by keeping the costs of carriage as low as possible on small scale multiplexes. That is why we support the proposal to require multiplex operators to provide a high degree of price transparency up front as part of the initial licence applications. These measures alongside the requirements on reserved capacity should be sufficient to address the concerns on pricing and access that have been raised.

Question 6 – We would welcome views on this approach (to ownership restrictions).

29. With regard to the ownership of small scale multiplex licences, Radiocentre agrees with the assessment made by DCMS that a limit of just one licence per organisation would be overly restrictive.
30. However it is also appropriate to consider steps to prevent an undue concentration of ownership. Any such restrictions will obviously need to be proportionate and must take into account the fact the principal protective objectives of the ownership restrictions (namely mitigating against high transmission costs and restricted access for non-profit services), will be achieved largely by the separate measures reserving capacity and introducing a transparent pricing structure.
31. We have discussed the implications of these proposals with our members, taking all of these factors into account. As a result we do have some concerns that aspects of the licensing structure risk being overly complex and unnecessarily restrictive. Our comments on the licence holder proposals are set out individually below.

Existing national multiplex licence holders

32. On the face it seems reasonable to limit the ability of national multiplex licence holders to hold a majority share in the entity that holds a small scale radio multiplex licence up to a maximum of 5

licences. However, due to the lack of detail within the consultation, it is not entirely clear to us what companies or entities would be limited by this provision.

33. There are two existing national commercial radio multiplex licence holders Digital One (owned by Arqiva) and Sound Digital (a joint venture between Arqiva, Bauer and Wireless Group). From the information provided in the consultation document it is unclear whether the restriction being proposed is for these licence holding entities or their constituent shareholders.
34. One of the reasons for this lack of clarity is the inconsistent use of language in the proposals. For example, there is no specific reference to companies with 'an interest' in one of these national multiplex licences (yet there is a specific reference to this in the following section relating to local multiplexes, below). We urge DCMS to clarify and expand on this point.
35. Our starting point would be to support a restriction being applied to the national multiplex licence holding companies (Digital One and Sound Digital) or any company with a significant interest in more than one of these licences. Where these companies hold a minority interest in other organisations, such organisations should not be restricted from holding small scale licences.

Existing local multiplex licence holders (with no interest in national multiplex licences)

36. Radiocentre has serious concerns with this element of the proposal. This approach is overly restrictive and, if implemented in its current form, would exclude numerous local operators from developing this pioneering new broadcast technology in parts of the country where there is likely to be genuine demand.
37. Firstly, limiting a stake for this group to 50% appears to be needlessly arbitrary. At a minimum, Ofcom should be given scope to review the threshold and have the ability to vary it where necessary, particularly in areas where demand is limited or where a multiplex may not otherwise be viable.
38. Secondly, the proposal to prevent those with *any* interest in a local DAB multiplex from being able to hold a small scale multiplex licence (in a local area that is likely to be most relevant to them) is unduly restrictive. For example, there are a number of small commercial broadcasters that have an interest in their local DAB multiplex. Under the current proposals it seems they will automatically be prevented from having any interest in a small scale DAB multiplex licence in an overlapping local area.
39. The following list provides an illustration of where local commercial broadcasters also have an interest in their local DAB multiplex. The size of these shareholdings will vary and are often held as part of a joint venture with the multiplex company or other operators.

Examples of local DAB multiplexes with local commercial radio shareholders:

- Derbyshire (Now Digital East Midlands Ltd) – Sabras Sound
- Gloucestershire (MuxCo South Midlands Ltd) – Murfin Media (Sunshine Radio)
- Herefordshire & Worcestershire (MuxCo South Midlands Ltd) – Murfin Media (Sunshine Radio)
- Lincolnshire (MuxCo Lincolnshire Ltd) – Lincs FM
- North Yorkshire (MuxCo North Yorkshire Ltd) – UKRD Group
- Surrey and South London (MuxCo Surrey Ltd) – UKRD Group
- West & Mid Wales (MuxCo Wales Ltd) – Nation Broadcasting Ltd
- North West Wales (MuxCo North Wales Ltd) – Nation Broadcasting Ltd
- Wrexham, Chester & Liverpool (MuxCo NE Wales & West Cheshire Ltd) – Dee 106.3, Nation Broadcasting Ltd

37. A blanket rule that prevents such operators from having any interest in a small scale DAB licence in these areas could have significant negative consequences for the growth of the technology, particularly as a partnership with commercial operators is likely to be required in many such areas in order to develop a viable small scale licence application.
38. For example, the proposed restriction would mean that the development of a small scale multiplexes in towns in West Wales such as Aberystwyth would need to take place without any involvement Nation Broadcasting, the owner local commercial radio station Radio Ceredigion (a crucial local stakeholder with relevant knowledge, expertise and experience). Similarly the Lincs FM Group, owner of local stations such as Compass FM, would be prevented from being involved as part of any small scale DAB licence across an area of Eastern England, from Grimsby and Scunthorpe down to Boston and Grantham.
39. There will be numerous other examples in the areas listed above where such local operators will be excluded from any involvement. As a result there is a risk that small scale DAB multiplexes in these areas will either not get launched at all or will be reliant on local community operators or volunteers.
40. This is unlikely to be a satisfactory outcome for most local commercial operators. New small scale multiplexes need to be robust enough for commercial and community services to have confidence in their reliability and security. Excluding experienced local commercial operators from any involvement in these areas and relying upon volunteers to both launch and operate a multiplex could present significant and unnecessary risks.
41. It is also worth noting that for some small commercial operators this restriction could force them to consider a choice between continued support for and involvement in local DAB multiplexes in their area or alternatively supporting small scale DAB multiplexes. We do not believe that operators should be required to make a binary choice, as their involvement in both tiers may be necessary depending on the local circumstances. In addition, it would be unfortunate if the progress that has been made on expanding local DAB coverage in recent years was undermined in some areas, by existing commercial operators being forced to choose and deciding to only pursue small scale DAB.
42. We understand the desire to prevent high carriage costs, which could result from an undue concentration of ownership. However, we would repeat our view that the measures designed at reserving capacity and introducing a transparent pricing structure should be sufficient to address these concerns. Therefore DCMS should withdraw the proposal for a blanket restriction on commercial radio shareholders with an interest in local DAB multiplexes.
43. Similarly we do not believe that the shareholdings in local DAB multiplexes held by Bauer, Wireless Group or Global should preclude them from any involvement in small scale DAB multiplex licence. However, as noted above, the application of a 'Step-Aside' rule for such applications would probably be appropriate.

Individuals/organisations/entities holding no national or local multiplex licence

44. This proposal – that there are no restrictions on the number of licences that an organisation or entity can hold or have an interest in – appears to be appropriate for this group. However, it should be made clear whether this restriction would apply in the case of minority shareholders in current local DAB multiplexes.

Restrictions on holding multiple licences in the same area

45. We have no objections to the proposed restrictions on holding multiple licences in the same area, essentially limited to only one small scale licence covering (in Ofcom's view) substantially the

same area. We would also suggest that Ofcom takes into account the ownership of multiple and adjoining small scale multiplexes, to ensure that this does not develop in a way that replicates the local DAB layer.

Carriage restriction

46. It is a logical approach not to place any restrictions on DSP licence and new C-DSP licence holders taking carriage of services on different small scale multiplexes.

DETERMINING THE SIZE OF A SMALL SCALE RADIO MULTIPLEX

Question 7 – Do you agree with this two-step approach to delineating the size of small scale multiplexes?

Question 8 – Do you agree with the up to 40% limit in areas already served by a local multiplex; if not, why not and what alternative do you propose?

47. Determining the size of a small scale multiplex is an important consideration. Radiocentre therefore welcomes the indication that Ofcom will develop an outline frequency plan and consult on it over the coming months. We would also expect this to cover the question of appropriate power levels if small scale DAB is to be a realistic solution for commercial operators.
48. With respect to the two-step approach suggested by DCMS, the first step – granting Ofcom increased flexibility where there are no current local multiplex licenses in an area – appears appropriate. However, Radiocentre has a number of concerns with the second stage.
49. Unfortunately the consultation is not clear on proposals that, in areas already served by a local DAB multiplex, a new small scale DAB multiplex could cover an area up to a maximum of 40 % of the existing local DAB multiplex area. Crucially, it is not detailed whether the ‘area’ that will be considered refers to a *geographical* area or an area delineated by *population*.
50. A maximum of 40 % of the existing local DAB multiplex area geographically is potentially a very high threshold. In an urban area, for example, 40 % of a geographical area could quite conceivably cover around 90 % of a local population. A threshold of 40 % of the population would provide a very different outcome, but could also vary depending on exactly how population is assessed.
51. In reviewing the proposed approach we analysed the Measured Coverage Area (MCA) population of analogue-only commercial stations as percentage of the total Primary Protected Area (PPA) population (at [Annex 2](#), attached). This method highlights that a 40 % of population coverage would provide a useful guide for the majority of small FM/ AM commercial stations. However, we suggest that more work is done in this area with Ofcom to understand properly what is being proposed and the implications, especially for these operators. In the meantime DCMS should prioritise a flexible approach that enables it to accommodate all licensed commercial radio stations not currently on DAB.

DURATION OF SMALL SCALE RADIO MULTIPLEX LICENCES

Question 9 – We would be grateful for views on these options or other options along with reasons for your choice.

Question 10 – We would also welcome view on the merits of linking licence length with underlying demand in an area for a small scale multiplex licence.

52. In order to provide a high level of certainty for multiplex operators, Radiocentre takes the view that small scale radio multiplex licences should run for at least 7 years, with the option to renew for a further 5 years. This period should provide a reasonable opportunity for the licence holders

to become established and is broadly in line with the statutory approach to analogue radio licence terms and extensions. It will also mean that Ofcom will be able to deal with the relicensing of local DAB multiplexes (which are due to expire in 2030) ahead of small scale DAB.

53. We do not agree with merits of linking licence length with underlying demand as this could effectively penalise the most popular and successful multiplexes by awarding them shorter terms than those operating in areas with lower demand.

CREATING ADDITIONAL LOCAL MULTIPLEXES

54. Radiocentre recognises the demand for additional local DAB multiplexes in certain areas around the UK. We look forward to reviewing Ofcom's consultation in the near future.
55. One consideration that we wish to highlight is specific to large urban areas where demand is high, such as Birmingham, Manchester or South Yorkshire. In these cases appropriate consideration should be given to the benefits of a new local multiplex over a number of small scale multiplexes, or a combination approach which factors in the possibility of both a new local and small scale multiplexes being operated alongside one another.
56. In addition we note that there are parts of the country that are not currently covered at all by local DAB at present (e.g. Cumbria, parts of Scotland), due to previous concerns about viability cost of transmitter build out. As part of its review of spectrum Ofcom should also take into account the fact that this situation may have changed in some cases, leading to unmet demand for local DAB as well as small scale multiplexes.

BBC ACCESS TO SMALL SCALE DAB

Question 11 – We welcome views on this approach.

57. Radiocentre would support the BBC taking capacity on a small scale radio multiplex assuming this is limited to supplementary coverage to its existing national DAB network and local DAB multiplexes. Additional requirements should require a further review by DCMS/Ofcom.

OFCOM DUTY TO CONSIDER COMMERCIAL IMPACTS ON LOCAL MULTIPLEXES

Question 12 – We would welcome views on the implications of this approach.

58. Parliamentarians were clearly conscious of the impact of the new small scale multiplex as provisions were made available within the Broadcasting (Radio Multiplex Services) Act 2017 1 (4) (d) for Ofcom to "have regard to the effect of awarding a small-scale radio multiplex licence on holders of local radio multiplex licences".
59. This does not mean that full impact assessments are required whenever a small scale multiplex is licensed. This would risk being too onerous and could slow down the licensing timetable. However, it is appropriate for the licensing of new small scale multiplexes to be phased in gradually, with the possibility of licensing rounds in order to give Ofcom the opportunity to consider any impact that there might be on local DAB or the market overall.
60. It will be especially important to tread carefully in rural markets that have existing local DAB multiplexes with spare capacity, as these are likely to be particularly vulnerable to changes in demand.

ABOUT RADIOCENTRE

Radiocentre is the industry body for commercial radio. We work on behalf of over 50 stakeholders who represent 90% of commercial radio in terms of listening and revenue.

We perform three main functions on behalf of our members:

- Drive industry revenue by promoting the benefits of radio to advertisers and agencies through a combination of marketing activity (e.g. events, advertising, PR, and direct mail), research, and training
- Provide UK commercial radio with a collective voice on issues that affect the way that radio stations operate, working with government, politicians, policy makers and regulators to secure the best environment for growth and development of the medium
- Ensure advertising messages on commercial radio stations comply with the necessary content rules and standards laid out in the BCAP Code of Broadcast Advertising and the Ofcom Broadcasting Code.

www.radiocentre.org

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ANNEX 1 – ANALOGUE ONLY COMMERCIAL RADIO STATIONS (FM/ AM)

Name/ brand	Area	Group
Heart (Herts)	St Albans & Watford	Adventure Radio
Radio Borders	The Borders	Bauer Media
CFM	Carlisle	Bauer Media
CFM	West Cumbria	Bauer Media
Town FM	Ipswich	Celador
North Norfolk Radio	North Norfolk	Celador
Dream 100	Tendring	Celador
The Beach	Great Yarmouth & Lowestoft	Celador
Radio Norwich	Norwich	Celador
Sam FM	Swindon	Celador
Sam FM	Bristol	Celador
The Breeze (Andover)	Andover	Celador
The Breeze (Basingstoke)	Basingstoke	Celador
The Breeze (Bath)	Bath	Celador
The Breeze (Bridgwater)	Bridgwater and West Somerset	Celador
The Breeze (Bristol)	Bristol	Celador
The Breeze (Cheltenham)	Cheltenham	Celador
The Breeze (E.Hants/ SW Surrey)	Alton/Haslemere	Celador
The Breeze (Frome & W. Wilts)	Warminster	Celador
The Breeze (Newbury)	Newbury	Celador
The Breeze (North Dorset)	Shaftesbury	Celador
The Breeze (North Somerset)	Weston-super-Mare/North Somerset	Celador
The Breeze (Portsmouth)	Portsmouth	Celador
The Breeze (Reading)	Reading	Celador
The Breeze (South Devon)	Torbay	Celador
The Breeze (Southampton)	Southampton	Celador
The Breeze (Winchester)	Winchester	Celador
The Breeze (Yeovil)	Yeovil	Celador
Silk 106.9 FM	Macclesfield	Dee 106.3 Ltd
Lakeland Radio (Smooth)	Kendal/Windermere	Global
The Bay (Heart)	Morecambe	Global
Argyll FM	Kintyre, Islay and Jura	Independent
Cuillin FM	Skye	Independent
Fosse 107 (Hinkley)	Hinckley	Independent
Fosse 107 (Loughborough)	Loughborough	Independent
Heartland FM (Pitlochry)	Pitlochry & Aberfeldy	Independent
High Peak Radio	Buxton	Independent
Imagine FM	Stockport	Independent
Isles FM	Western Isles	Independent
Kingdom FM	Fife	Independent
Lochbroom FM	Ullapool	Independent
London Greek Radio	Haringey	Independent
Mansfield 103.2	Mansfield	Independent
Oban FM	Oban	Independent
Original 106	Aberdeen	Independent/ New Wave
Radio Jackie	Kingston-upon-Thames	Independent

Radio Plymouth	Plymouth	Independent
RNA FM	Arbroath	Independent
SIBC	Shetland Islands	Independent
Star Radio	Cambridge	Independent
The Revolution	Oldham	Independent
Two Lochs Radio	Gairloch & Loch Ewe	Independent
Wave 102	Dundee	Independent/ DCT
KMFM Ashford	Ashford	KMFM
KMFM Canterbury	Canterbury	KMFM
KMFM Folkestone/Dover	Dover/Folkestone	KMFM
KMFM Maidstone	Maidstone	KMFM
KMFM Thanet	Thanet	KMFM
KMFM West Kent	Tunbridge Wells/ Sevenoaks	KMFM
Dearne FM	Barnsley	Lincs FM
Ridings FM	Wakefield	Lincs FM
Rother FM	Rotherham	Lincs FM
Rutland Radio	Rutland	Lincs FM
More Radio	Hastings	Media sound holdings
More Radio	Burgess Hill and Haywards Heath	Media sound holdings
More Radio	Eastbourne	Media sound holdings
More Radio	Worthing	Media sound holdings
Isle of Wight Radio	Isle of Wight	Media sound holdings
Radio Ceredigion	Ceredigion	Nation Broadcasting
Q100.5 FM	Newry	Northern Media Group
Q101.2 FM	Omagh and Enniskillen	Northern Media group
Q106/7 FM	Mid Ulster	Northern Media Group
Q107 FM	Ballymena	Northern Media Group
Q97.2 FM	Coleraine	Northern Media Group
Banbury Sound	Banbury	Quidem
Rugby FM	Rugby	Quidem
Touch FM (Tamworth)	South-East Staffordshire	Quidem
Touch FM	Stratford-upon-Avon	Quidem
Touch FM (Coventry)	Coventry	Quidem
Touch FM (Warwick)	Warwick	Quidem
Channel 103	Jersey	Tindle Radio
Island FM	Guernsey	Tindle Radio
KLFM	King's Lynn	UKRD
Mix 96	Aylesbury	UKRD
Spire FM	Salisbury	UKRD
Spirit FM	Chichester	UKRD
Sun FM	Sunderland	UKRD
Wessex FM	Weymouth and Dorchester	UKRD
Radio Wave	Blackpool	Wireless
Wish FM	Wigan	Wireless
Wire FM	Warrington	Wireless
Peak FM	Chesterfield	Wireless
Tower FM	Bolton and Bury	Wireless
Signal 107	Kidderminster	Wireless

Signal 107
Signal 107
Signal 107
Your Radio
Your Radio

Shrewsbury
Telford
Wolverhampton
Helensburgh
Dumbarton

Wireless
Wireless
Wireless
Your
Your

ANNEX 2: Analogue commercial radio stations (MCA and estimated Mux population)

Name/ brand	Area	Group	MCA	Relevant Mux	Mux PPA (Households)	Mux PPA (Adults)	MCA as % ppa
Heart (Herts)	St Albans & Watford	Adventure Radio	293,347	Herts, Beds & Bucks	1,063,784	2,340,325	12.5%
Radio Borders	The Borders	Bauer Media	0	n/a	0	0	n/a
CFM	Carlisle	Bauer Media	0	n/a	0	0	n/a
CFM	West Cumbria	Bauer Media	0	n/a	0	0	n/a
Town FM	Ipswich	Celador	154,993	Suffolk	329,089	723,996	21.4%
North Norfolk Radio	North Norfolk	Celador	0	n/a	0	0	n/a
Dream 100	Tendring	Celador	79,247	Essex	756,945	1,665,279	4.8%
The Beach	Great Yarmouth & Lowestoft	Celador	0	n/a	0	0	n/a
Radio Norwich	Norwich	Celador	290,131	Norfolk	453,197	997,033	29.1%
Sam FM	Swindon	Celador	139,722	West & South Wiltshire	183,212	403,066	34.7%
Sam FM	Bristol	Celador	539,064	Bristol & Bath	479,112	1,054,046	51.1%
The Breeze (Andover)	Andover	Celador	39,624	Berkshire & North Hants	476,138	1,047,504	3.8%
The Breeze (Basingstoke)	Basingstoke	Celador	99,745	Berkshire & North Hants	476,138	1,047,504	9.5%
The Breeze (Bath)	Bath	Celador	82,433	Bristol & Bath	479,112	1,054,046	7.8%
The Breeze (Bridgwater)	Bridgwater and West Somerset	Celador	58,125	Somerset	245,821	540,806	10.7%
The Breeze (Bristol)	Bristol	Celador	339,325	Bristol & Bath	479,112	1,054,046	32.2%
The Breeze (Cheltenham)	Cheltenham	Celador	111,730	Gloucester	274,761	604,474	18.5%
The Breeze (E.Hants/ SW Surrey)	Alton/Haslemere	Celador	73,032	Surrey	594,201	1,307,242	5.6%
The Breeze (Frome & W. Wilts)	Warminster	Celador	18,410	West & South Wiltshire	183,212	403,066	4.6%
The Breeze (Newbury)	Newbury	Celador	67,103	Berkshire & North Hants	476,138	1,047,504	6.4%
The Breeze (North Dorset)	Shaftesbury	Celador	53,710	Bournemouth	366,518	806,340	6.7%
The Breeze (North Somerset)	Weston-super-Mare/North Somerset	Celador	73,478	Somerset	245,821	540,806	13.6%
The Breeze (Portsmouth)	Portsmouth	Celador	300,485	South Hampshire	651,005	1,432,211	21.0%
The Breeze (Reading)	Reading	Celador	213,772	Berkshire & North Hants	476,138	1,047,504	20.4%
The Breeze (South Devon)	Torbay	Celador	180,841	Devon	315,203	693,447	26.1%
The Breeze (Southampton)	Southampton	Celador	0	South Hampshire	651,005	1,432,211	0.0%
The Breeze (Winchester)	Winchester	Celador	50,343	South Hampshire	651,005	1,432,211	3.5%
The Breeze (Yeovil)	Yeovil	Celador	129,441	Somerset	245,821	540,806	23.9%
Silk 106.9 FM	Macclesfield	Dee 106.3 Ltd	567,108	Stoke	529,426	1,164,737	48.7%
Lakeland Radio (Smooth)	Kendal/Windermere	Global	0	n/a	0	0	n/a
The Bay (Heart)	Morecambe	Global	0	n/a	0	0	n/a
Argyll FM	Kintyre, Islay and Jura	Independent	0	n/a	0	0	n/a
Cuillin FM	Skye	Independent	0	n/a	0	0	n/a
Fosse 107 (Hinkley)	Hinckley	Independent	59,809	Coventry	404,549	890,008	6.7%
Fosse 107 (Loughborough)	Loughborough	Independent	80,499	Leicester	432,864	952,301	8.5%
Heartland FM (Pitlochry)	Pitlochry & Aberfeldy	Independent	0	n/a	0	0	n/a
High Peak Radio	Buxton	Independent	67,792	Derby	355,203	781,447	8.7%
Imagine FM	Stockport	Independent	398,120	Manchester	1,476,067	3,247,347	12.3%
Isles FM	Western Isles	Independent	0	n/a	0	0	n/a
Kingdom FM	Fife	Independent	0	n/a	0	0	n/a
Lochbroom FM	Ullapool	Independent	0	n/a	0	0	n/a
London Greek Radio	Haringey	Independent	1,012,200	London	5,000,000	11,000,000	9.2%
Mansfield 103.2	Mansfield	Independent	137,739	Nottingham	551,559	1,213,430	11.4%
Oban FM	Oban	Independent	0	n/a	0	0	n/a
Original 106	Aberdeen	Independent/ New Wave	291,872	Aberdeen	214,570	472,054	61.8%
Radio Jackie	Kingston-upon-Thames	Independent	657,346	London	5,000,000	11,000,000	6.0%
Radio Plymouth	Plymouth	Independent	248,076	Plymouth	193,826	426,417	58.2%
RNA FM	Arbroath	Independent	0	n/a	0	0	n/a
SIBC	Shetland Islands	Independent	0	n/a	0	0	n/a
Star Radio	Cambridge	Independent	173,019	Cambridge	230,539	507,186	34.1%

ANNEX 2: Analogue commercial radio stations (MCA and estimated Mux population)

The Revolution	Oldham	Independent	673,539	Manchester	1,476,067	3,247,347	20.7%
Two Lochs Radio	Gairloch & Loch Ewe	Independent	0	n/a	0	0	n/a
Wave 102	Dundee	Independent/ DCT Media	110,451	Dundee	234,671	516,276	21.4%
KMFM Ashford	Ashford	KMFM	0	Kent	756,604	1,664,529	0.0%
KMFM Canterbury	Canterbury	KMFM	65,624	Kent	756,604	1,664,529	3.9%
KMFM Folkestone/Dover	Dover/Folkestone	KMFM	107,209	Kent	756,604	1,664,529	6.4%
KMFM Maidstone	Maidstone	KMFM	90,329	Kent	756,604	1,664,529	5.4%
KMFM Thanet	Thanet	KMFM	0	Kent	756,604	1,664,529	0.0%
KMFM West Kent	Tunbridge Wells/ Sevenoaks	KMFM	206,277	Kent	756,604	1,664,529	12.4%
Dearne FM	Barnsley	Lincs FM	173,022	South Yorkshire	754,754	1,660,459	10.4%
Ridings FM	Wakefield	Lincs FM	385,235	Leeds	637,774	1,403,103	27.5%
Rother FM	Rotherham	Lincs FM	385,235	South Yorkshire	754,754	1,660,459	23.2%
Rutland Radio	Rutland	Lincs FM	32,012	Leicester	432,864	952,301	3.4%
More Radio	Hastings	Media sound holdings	86,353	Sussex	731,318	1,608,900	5.4%
More Radio	Burgess Hill and Haywards Heath	Media sound holdings	107,975	Sussex	731,318	1,608,900	6.7%
More Radio	Eastbourne	Media sound holdings	130,359	Sussex	731,318	1,608,900	8.1%
More Radio	Worthing	Media sound holdings	113,487	Sussex	731,318	1,608,900	7.1%
Isle of Wight Radio	Isle of Wight	Media sound holdings	103,792	South Hampshire	651,005	1,432,211	7.2%
Radio Ceredigion	Ceredigion	Nation Broadcasting	72,088	Mid & West Wales	214,845	472,659	15.3%
Q100.5 FM	Newry	Northern Media Group	51,702	Northern Ireland	797,166	1,753,765	2.9%
Q101.2 FM	Omagh and Enniskillen	Northern Media group	81,247	Northern Ireland	797,166	1,753,765	4.6%
Q106/7 FM	Mid Ulster	Northern Media Group	74,471	Northern Ireland	797,166	1,753,765	4.2%
Q107 FM	Ballymena	Northern Media Group	0	Northern Ireland	797,166	1,753,765	0.0%
Q97.2 FM	Coleraine	Northern Media Group	44,948	Northern Ireland	797,166	1,753,765	2.6%
Banbury Sound	Banbury	Quidem	60,770	Oxford	275,262	605,576	10.0%
Rugby FM	Rugby	Quidem	58,763	Coventry	404,549	890,008	6.6%
Touch FM (Tamworth)	South-East Staffordshire	Quidem	207,582	Birmingham	1,064,113	2,341,049	8.9%
Touch FM	Stratford-upon-Avon	Quidem	190,454	n/a	0	0	n/a
Touch FM (Coventry)	Coventry	Quidem	247,275	Coventry	404,549	890,008	27.8%
Touch FM (Warwick)	Warwick	Quidem	103,967	Coventry	404,549	890,008	11.7%
Channel 103	Jersey	Tindle Radio	0	n/a	0	0	n/a
Island FM	Guernsey	Tindle Radio	0	n/a	0	0	n/a
KLFM	King's Lynn	UKRD	0	n/a	0	0	n/a
Mix 96	Aylesbury	UKRD	91,765	Herts, Beds & Bucks	1,063,784	2,340,325	3.9%
Spire FM	Salisbury	UKRD	0		0	0	n/a
Spirit FM	Chichester	UKRD	271,387	South Hampshire	651,005	1,432,211	18.9%
Sun FM	Sunderland	UKRD	352,530	Tyne & Wear	816,484	1,796,265	19.6%
Wessex FM	Weymouth and Dorchester	UKRD	106,779	Dorset	366,518	806,340	13.2%
Radio Wave	Blackpool	Wireless	227,322	Lancashire	719,164	1,582,161	14.4%
Wish FM	Wigan	Wireless	511,113	Manchester	1,476,067	3,247,347	15.7%
Wire FM	Warrington	Wireless	207,411	Manchester	1,476,067	3,247,347	6.4%
Peak FM	Chesterfield	Wireless	177,509	Manchester	1,476,067	3,247,347	5.5%
Tower FM	Bolton and Bury	Wireless	0	Manchester	1,476,067	3,247,347	0.0%
Signal 107	Kidderminster	Wireless	0	Wolverhampton & Shropshire	706,174	1,553,583	0.0%
Signal 107	Shrewsbury	Wireless	106,721	Wolverhampton & Shropshire	706,174	1,553,583	6.9%
Signal 107	Telford	Wireless	0	Wolverhampton & Shropshire	706,174	1,553,583	0.0%
Signal 107	Wolverhampton	Wireless	329,122	Wolverhampton & Shropshire	706,174	1,553,583	21.2%
Your Radio	Helensburgh	Your	0	n/a	0	0	n/a
Your Radio	Dumbarton	Your	0	n/a	0	0	n/a