

The Future of Radio – The Next Phase

This memorandum is written on behalf of
CBC – Christian Broadcasting Council



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The Christian Broadcasting Council of the United Kingdom (CBC) wishes to give our views regarding Ofcom's invitation to comment on their "Future of Radio – The Next Phase" document, published 22nd November 2007. This new Ofcom document follows on from their previous radio document published on 17th April 2007. We give below our responses to the two questions that Ofcom has posed in this further consultation and comment on the formation of the Digital Radio Working Group.

A4.1 Ofcom's Revised Proposal on localness guidance for analogue commercial radio. Do they strike the right balance between safeguarding the interests of listeners and ensuring the viability of the commercial local radio industry?

CBC said in our response to the previous consultation *that the best organisation to judge the appropriate level of localness is the radio station operator rather than the regulator, as the USP of local radio is in fact its localness.* We therefore suggested some minimum localness thresholds.

As the new Ofcom proposals, shown in Table 1 in a simplified form, together with their proposals on co-location, are broadly in line with our own suggestions **we believe that this new guidance should be supported as it strikes the right balance between localness and the need for economic viability of local commercial radio stations.**

Table 1: Analogue Localness Programme Guidance

Type of licence	Programming requirements
FM stations with populations over 250,000	Mon-Fri: Minimum of 10 hours per day of locally-produced programmes in daytimes, including breakfast, including local material across the 10 hours as a whole and local news at breakfast and afternoon drive. Weekends: Minimum of 4 hours per day of locally-produced programmes including local material and local news at late breakfast.
FM stations with populations under 250,000	Mon-Fri: May share programming within their 10 hours per day of locally-produced programmes in daytimes BUT must provide 4 hours of bespoke (i.e. specific to each station) programming per day of locally-produced programmes in peak time, including breakfast. Local news must be provided at breakfast and afternoon drive. Weekends: Minimum of 4 hours per day of locally-produced programmes including local material and local news at late breakfast.
AM stations N.B. Any AM station broadcasting to an area not also served by another commercial station will be treated as an FM station	Mon-Fri: Minimum of four hours per day of locally-produced programmes in peak time including local news plus local material drop-ins throughout daytime. At least a further 6 hours of programming should be produced within the nation (e.g. Wales). Weekends: Minimum of four hours per day of locally-produced programmes in peak time including local news.

A4.2 Ofcom's Revised Proposal on mono and stereo broadcasting on DAB.

Should the audio characteristics (e.g. stereo or mono) of the digital sound programme service be considered as an essential aspect of the character of the service, and therefore be regulated by Ofcom under the terms of section 54 of the Broadcasting Act 1996?

CBC believes that the extension of listener choice needs to guide Ofcom's proposal on whether to allow DAB radio stations to broadcast in stereo or mono.

Unfortunately until the passing of the Communications Act 2003 it was impossible for Christian/religious broadcasters to obtain space on a DAB multiplex. Therefore when the time came that these broadcasters could obtain licences there was hardly any free space available. We stated in our reply to the previous consultation, and noted in 5.43 of this consultation, that *there have been a number of cases where Christian broadcasters would have been restricted in obtaining space to broadcast on a DAB multiplex were it not for the case that mono capacity was available. In these cases the benefit of being able to broadcast in mono far outweighs the case for a fewer number of stations broadcasting in stereo regardless of the so-called reduction in sound quality of the service.*

At present two Christian broadcasters have managed to find space on full-service channels.

In Greater London Premier Christian Radio are broadcasting their London AM service on the DRg Multiplex at 80 Kbps Mono. Other services broadcasting in mono on the same multiplex include Easy, FUN, SMASH Hits, Panjab, Passion, Polish Radio and Virgin Groove.

UCB (United Christian Broadcasters) are now broadcasting two services in mono on a number of local multiplexes across the country. These services were previously only available via Sky satellite audio channels and the Internet.

As an example of a local region we see, in Table 2, that in order to give local listeners in the Birmingham/Black Country/Shropshire area the opportunity to hear a range of radio stations that a number of these services need to broadcast in mono. If all DAB stations were forced to broadcast in stereo then a number of radio stations, including Asian and Christian ones, would possibly disappear from the radio, thus reducing listener choice.

Table 2: Birmingham/Black Country/Shropshire Local DAB Radio Services

Station Name	Mono/Stereo	Kbps	Multiplexes
Asian FX	Mono	64	West Midlands
BBC Shropshire	Stereo	128	Wolverhampton/Shrewsbury
BBC WM	Stereo	128	Birmingham + Wolverhampton/Shrewsbury
Beacon	Stereo	128	Wolverhampton/Shrewsbury
BRMB	Stereo	128	Birmingham
Chill	Mono	80	Wolverhampton/Shrewsbury
Choice	Mono	64	West Midlands
Galaxy	Stereo	128	West Midlands
Gold	Stereo	128	Birmingham + Wolverhampton/Shrewsbury
Heart	Stereo	128	West Midlands
Heat radio	Stereo	112	Birmingham
Kerrang!	Mono	64	West Midlands
KISS	Stereo	128	Birmingham + Wolverhampton/Shrewsbury
LBC	Mono	48	West Midlands
Panjab	Mono	64	West Midlands
Punjabi Radio	Mono	80	Wolverhampton/Shrewsbury
Radio XL	Stereo	128	Birmingham
REAL	Stereo	128	West Midlands
Smooth	Stereo	128	West Midlands
Sunrise Radio	Mono	64/80	Birmingham + Wolverhampton/Shrewsbury
The Arrow - Rock	Stereo	128	West Midlands
Traffic	Mono	48	Wolverhampton/Shrewsbury
UCB Inspirational	Mono	64	West Midlands
UCB UK	Mono	64	West Midlands
XFM	Stereo	128	Birmingham + Wolverhampton/Shrewsbury

Note: List of stations on local multiplexes obtained from actual broadcasts in December 2007

CBC therefore agrees with Ofcom, as stated in 5.45, that the issue of whether a service should broadcast in stereo or mono is a characteristic of a digital sound programme service. We therefore broadly agree with the Ofcom proposals stated in 5.47 and 5.48 for national and local radio multiplexes.

CBC would suggest that the overall governing criteria for national and local radio multiplexes should be as follows:

1. **National Section 54(6A) multiplexes should broadcast in stereo for mainly music stations but that predominately speech stations should be allowed to broadcast in mono.** This would therefore allow for the programme services to appeal to a variety of tastes and interests.
2. **Local Section 54(6B) multiplexes should be allowed to use their capacity in order to provide a wide range of services, that are of interest to local listeners, and that the ability of a station to broadcast in stereo or mono should be a secondary consideration.** This would therefore safeguard any changes from unacceptably narrowing the range of local DAB services in an area as well as being conducive to the maintenance or promotion of fair and effective competition.

A5.100/101 Decisions postponed and the formation of Digital Radio Working Group (DRWG)

Decisions remitted to DRWG:

The decision to carry out reviews of AM and FM in 2009

The renewal provisions for analogue licensees providing a relevant DAB service

The indefinite extension of all licenses subject to a termination clause

CBC supports the formation of the Digital Radio Working Group (DRWG) that has been set up jointly by DCMS and Ofcom.

We trust that that the views of CBC, as expressed in our responses to the Future of Radio consultation dated 22 June 2007 and to this further consultation, will be taken into account in the deliberations of the DRWG. We would be happy to give our views direct to the DRWG if required.

We hope that our comments are of help to Ofcom in the further formulation of their policies with regard to radio broadcasting.

Yours truly,

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Consultant to CBC on Broadcasting Regulation

14 December 2007

The Christian Broadcasting Council, known as CBC, was founded in 1983:

- ✓ *To stimulate and promote the knowledge of the Christian faith and the propagation of the Gospel of Jesus Christ through the broadcasting media in the United Kingdom.*
- ✓ *To encourage the highest standards of Christian media communication.*
- ✓ *To support and develop the knowledge and standards of all those involved in broadcasting.*
- ✓ *To bring together in fellowship those working in broadcasting and those who support the vision of CBC, under guiding and encouraging them in their spiritual lives.*