

The Future of Radio

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 introductory document for the future of FM and AM services and the alignment of analogue and digital regulation.

Ofcom in their document say that they are not looking for detailed thoughts at this stage and therefore CBC wishes to place on record our general observations which we would expect to flesh out in any further response that we give to Ofcom in regard to the future of radio.

1. Issues facing the radio market.

We would agree, in part, with the three main observations made by Ofcom (1.4.1 – 1.4.3) are:

- a. *Competition from other technologies is growing – although localness on radio remains important for many listeners.*
- b. *Radio advertising is stalling as advertisers switch to Internet advertising.*
- c. *Digital radio is taking an increasing share of radio listening putting pressure on local analogue stations.*

In the case of 1.a we would suggest that localness might be important for local mainstream format stations and highly localised community radio. However for a regional rock music station or other locally delivered specialist genres such as Asian or Christian music it should be left to the discretion of the service operator to decide the level of local news and information as for most listeners the reason for tuning to those services is because of the nature of the music played and not necessarily for a local news service.

2. Reasons for prompt regulatory action.

CBC believes that Ofcom's comment regarding the unsustainable regulatory burden on local analogue commercial radio is justified and CBC will look forward to commenting on detailed proposals to help lift the burden.

We also believe that work needs to be undertaken to prepare for the freeing-up of the existing analogue spectrum for future uses as more and more listening moves to digital methods of delivery. These must include opportunities for existing small scale analogue services to move to digital methods of broadcasting.

CBC would encourage Ofcom in their forthcoming consultation document to suggest a timetable for the change of uses of the current analogue radio spectrum. Taking into account the usage of DAB radios by listeners, we would suggest that views are sort on a policy for the transfer of all BBC and INR services onto Band III DAB only.

We would suggest that all "Heritage" ILR should be ordered to stop the simulcasting their services on two different terrestrial wavebands (FM or AM and DAB) or lose

one waveband by a specific date within the next 5-10 years. The 'use it or lose it' policy in an earlier age helped to expand listener choice. Such an Ofcom policy will enable the better use of the terrestrial broadcasting spectrum – FM (87.5 – 108 MHz), analogue AM and/or DRM (144 – 281 kHz & 522 – 1620 kHz) and DAB (174 – 230 MHz & 1452 – 1482 MHz).

3. Future opportunities for more specialist stations including Christian radio.

Christian/religious broadcasting on non-BBC radio has had a mixed past. Prior to 1990 all ILR stations had to have religious programmes on the stations, but with the passing of the 1990 Broadcasting Act this requirement was removed and replaced with the opportunity religious organisations, once approved by the regulator, to apply for local analogue AM/FM radio licences.

To date London's *Premier Christian Radio* (AM 1305/1332/1413) is the only station to successfully apply for an analogue commercial radio licence and it has broadcast to the Christian community of Greater London since 10th June 1995 from where it has pioneered a local radio worship music and speech format in this country.

Today, with the passing of the Communications Act 2003, we are starting to see a growing Christian broadcasting sector with a variety of formats broadcasting on community radio and digital radio. Recently one of the first community radio stations *Cross Rhythms City Radio*, serving both the Christian and general community of Stoke-on-Trent, received praise about the value of their community radio service in a government report titled "The Community Radio Sector: Looking to the Future" published by the Department of Culture, Media and Sport.

CBC would wish to see the opportunities for Christian and other specialist stations enhanced in any future plans for radio in the United Kingdom including opportunities for enabling these stations to offer multi-media services such as on-demand and archive downloads.

We trust that our comments are of help to Ofcom.

Yours truly,

Mrs Olave Snelling
Chairman of the Executive Council – Christian Broadcasting Council

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Consultant to CBC on Broadcasting Regulation

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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 girding and encouraging them in their spiritual lives.*