

**MUSICIANS' UNION RESPONSE
TO THE OFCOM CONSULTATION DOCUMENT
RADIO – PREPARING FOR THE FUTURE**

1. The Musicians' Union represents over 30,000 full and part-time professional musicians working in all genres of music.
2. Radio is probably the most important delivery platform for music. Most people listen to music on their radios and for many it is the only way that they experience 'live' performance. This is particularly true of the BBC's analogue and digital radio stations which relay a varied mix of musical styles much of which is broadcast live or specially recorded for later transmission.
3. This short response will confine itself to the requirement for Ofcom to produce guidance, as set out in Section 314 of the Communications Act, regarding local material and local production on commercial radio. The submission addresses the issues that are presented in Section 6 of the consultation document.
4. We note with interest the research conducted by Ofcom and in particular the analysis of types of music which are currently available on commercial radio and the listeners' attitude to it. The results of the research demonstrate how important music is to local commercial radio, with a population coverage of 97% for 'chart led mainstream' music and perhaps more interestingly 61% for 'specialist music – youth' and 32% for 'specialist music – other'. The latter category includes traditionally under represented genres such as jazz, folk, country music and we surmise various ethnic and world music. Although the research does not make it clear whether the latter genres are included in the 33% population coverage that is categorised in the research as being 'ethnic',
5. We also note that regional stations tend to offer more specialist formats than local stations. Whilst we understand that regional stations have a larger potential listener base which enables them to support more niche formats, we are disappointed that more local stations do not offer transmission of local bands and ensembles.
6. The research highlights the demand for music on local commercial radio stations with the combined net score of +54% of respondents indicating that local music/bands and live music are important to them. We also note a combined net score of +66% of respondents indicating satisfaction with coverage of local music/bands and live music.

7. We believe that the studio location should ideally be in the Measured Coverage Area (MCA) of a local radio station, but would agree that for practical purposes Ofcom could expand the MCA to the licensed area. We would also hope that Ofcom could relax this requirements in situations where a local commercial radio station does not have adequate facilities to record live bands/groups and ensembles. In such instances we would hope that Ofcom would allow the recording of live music to take place outside the licensed area.

8. We agree that Ofcom should continue to meet the conditions of Section 106(1) of the Broadcasting Act by means of the requirement for local commercial radio stations to offer 'formats' in license applications. However, we are concerned that such formats are not always enforced by the regulator and would ask Ofcom to be vigilant in its enforcement of formats if they have been originally considered as part of the operating licence application.

9. In conclusion, we regard music as an essential part of the local commercial radio stations' output. We applaud the number of radio stations that use and promote local and live music and hope that Ofcom encourages other radio stations to follow suit. Music makes up the bulk of commercial radio output and we believe that the commercial stations, as major users of music, should put resources into encouraging its growth at a grass-roots level while at the same time promoting more established local artists. In this way a virtuous circle should be created which will assist the maintenance of a high standard of musical output in this country while providing high quality, unique entertainment for the listener.

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