

Response of the Radio Studies Network to ‘Radio – Preparing for the Future’

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The Radio Studies Network

The Radio Studies Network is the lead scholarly association of radio researchers and teachers in the UK. Its members include almost all active radio researchers in British universities along with significant representation of the leading active radio researchers in Europe, North America, and Australasia.

The aim of the Radio Studies Network is to contribute to the development of radio education and research through further and higher education institutions and in partnership with the radio industry.

Although a voluntary membership body the Network has been active in developing both the reputation of radio scholarship, and work in the field. We have organised four international conferences (in the UK and US) on radio, and contributed symposia to numerous others. We have established a radio research database with generous funding from the Radio Academy. In association with Intellect books we publish a thrice-yearly international journal of radio research. Finally, we maintain an email discussion group with over 150 participants.

Motivation for responding to Ofcom’s invitation to respond to its document ‘Radio – Preparing for the Future’

The membership of the Radio Studies Network assert their position as stakeholders in debates about the future radio in the UK, and we request that the organisation’s elected representatives are invited to take a role in the consultation process, particularly in phase two of Ofcom’s review.

General comments on the document ‘Radio – Preparing for the Future’

The Radio Studies Network recognises that any proposals made by Ofcom have to be made within the statutory obligations laid down by Parliament. Nevertheless we note, and particularly welcome, the transparent, reflective and evidence-based approach which underpins the document, and a willingness to think widely.

The members of the Network welcome the fact that the authors of the report have articulated Ofcom’s emphasis on the distinctiveness of radio as a medium, the need to explore the cultural and democratic purposes of radio, and the qualities of radio services as both public goods and commodities.

Many of the questions posed by the document deal with the details of regulation over which individual Network members may have different opinions. For that reasons we have addressed our collective response to the wider implications of the consultation questions, identifying where we think issues of quality, diversity, and public purpose

could be informed by better research and public debate.

Questions 1 to 7

The Radio Studies Network supports attempts to increase diversity in radio output and recognises that in the British radio systems this is one of the primary aims of the regulation of commercial radio through the issuing of licences and ensuring compliance with those licences. We accept that there needs to be a reference point for the regulation and that has to balance a clear statement of the distinctive nature of the station with the possibility of change in radio and popular music culture. If Ofcom were going to use statements of format as the means to do this we would welcome wider discussion about the most effective ways these could be expressed.

The Network understands the issues of local news provision as a optimisation between the economic drive to keep costs low and the cultural drive to provide relevant information to the radio listeners in a particular locale. The commercial companies and their representatives will no doubt argue that news is an expensive production activity and a suitable news service can be provided by sharing the costs across a number of stations. We would welcome Ofcom's support for work which examines the costs of different forms of production organisation, and the types of news service which are provided by different organisations of news production. Further we believe that the economic imperatives of commercial companies need balancing by clear statements by Ofcom of what constitutes localness and how it can be best achieved. With a clear sense of what quality in local news provision would be it would be possible to evaluate station output.

We recognise that if the number of stations is going to increase, this extra provision, in the short term at least, is likely to have to come at a lower production cost. Automation, shared studio facilities, and networked output can all have significant effects on production costs, and can therefore make the broadcasting of programmes during periods with low listenership more efficient. Although such approaches do not necessarily lead to falls in quality the Network would encourage Ofcom to commission research into the costs of automation, and of the imaginative ways it can be used in programme production. In addition we recognise that networked programming could be used to increase diversity in broadcasting and to spread the costs of relatively more expensive forms of broadcasting over a larger listenership.

The Network supports the idea of a format and localness file, available both at its premises and online, which demonstrates how a station is meeting its obligations. In particular we welcome its potential to initiate discussion about the successes of stations and the general public purposes of radio. However, we would also encourage Ofcom to work with stakeholders in citizenry, industry, and academic communities to encourage widespread debate about the public purposes of radio, and its qualities of localness. In particular we would welcome Ofcom support for initiatives which use this publicly-available information for the development of a radio listening culture. We would like to contribute to debates about how this could be achieved, and how such audits would be inclusive and democratic.

Question 8 to 15

The Network believes that if DAB is to become a major form of radio, and eventually a possible replacement for analogue radio, then it should be available to all. Thus all areas should be covered by local as well as national multiplexes. However, we also recognise that only Broadcasting Act licences secure the use of most of this spectrum for radio purposes. Further, in accordance with our aim of maximising access and diversity within radio, we feel that the new DAB spectrum should be safeguarded for radio, and therefore awarded under the Broadcasting Act.

Members of the Network believe that Nationally allocated spectrum should be shared between an expansion of public service radio broadcasting and additional commercial stations. The PSB element could involve the BBC in offering either new services or existing services at higher audio quality e.g. more stereo broadcasting and higher bit rates.

If DAB is to become a replacement for analogue radio, it is important that the primary interest of DAB multiplex operators remains radio rather than other media. This might be best served by retaining the 20% non-radio data limit. However were there safeguards that radio services would continue to be diverse, plural and of high audio quality, there might be a case for some relaxation of the limits. But evidence suggests that this should be approached with caution, particularly since many existing analogue stations are not yet on DAB, and in particular small commercial and community stations should, we believe, have a place on DAB.

At the moment Network members are not convinced of the arguments for removing the minimum bit-rate limit for DAB digital radio. While technical systems will always evolve, it is not always possible to introduce new standards in a way that is compatible with existing receivers. As a general principle the Network would argue that unless there is a certainty that quality will not be compromised, the minimum bit rate specification (a minimum at which almost all commercial stations operate) should be retained. We recognise, though, that this is an area which requires some technical and social research.

Questions 15 and 16.

The Network fully supports the development of a third tier of community radio on the basis that it extends diversity, and gives access to local people to broadcast. Given the relative weakness of community radio in Britain, the extensive expansion in commercial radio over the last few years, and the fears of commercial radio licensees that the advertising market and high costs of production make it difficult for additional profit maximizing firms to break even, the Network supports the development a community radio sector on all frequencies made available for radio broadcasts. This would include AM frequencies. However, we would be concerned if this was interpreted as support for AM as the only, or main, broadcast platform for the community sector. We encourage Ofcom to develop supportive alliances with existing community radio groups and their

national representatives to ensure that the development of community stations is financially and culturally successful.

Questions 17 to 19

The Network and its members believe we have much to offer in the phase two of the review. We fully support Ofcom's aims of enhancing choice, diversity and innovation for consumers at the UK, national, regional, local and community levels, and securing citizens' interests through the provision of radio designed to meet public purposes. In addition the Network recognises the general value in efficient, consistent, and productive regulation. We believe that the available research into the influences of different regulatory regimes is far too basic to draw detailed conclusions. For this reason we encourage Ofcom to support international research initiatives based upon comparative studies.

We believe that the development of a set of public purposes for radio is the most far sighted and thoughtful part of the document, and we would like to be fully involved in the discussions of these purposes, and the identification of ways such purposes could be researched and expressed. Again, international models, surveys and case studies will provide excellent information to ensure that this is an informed debate.

Radio is a distinctive medium, with a range of distinctive listener cultures. While it is useful to include discussions of other media and their public purposes, radio needs to be understood in its own terms. We share Ofcom's view of the importance of radio's localness, mobility and relationship to popular music culture.

The document raises important questions about a public purpose for radio, but we believe it is only possible to start to formulate an answer by building on a far greater research into radio and its listeners. In particular we are concerned that for all its virtues the report misses out on four important areas: the development of other radio technologies, a greater understanding of radio production economics, the public purposes of local radio news, and detail on the relationship between popular music culture and radio listening. Ofcom's own audience research shows that music is clearly the most important element in broadcasts for its listeners, and this is the most prominent part of the format document (which in itself is proposed as the basis of content regulation). We also note that some listeners felt there was too much repetition in the music played by the stations they listened to. However, the document does not set out ways, or invite comment on, how music could be understood to be part of the public purposes of radio. Members of the Network would be particularly interested in developing research strategies to explore these areas and calls on Ofcom to support such vital work.

Undoubtedly whatever the final expression of public purposes in a democratic, multicultural society, they are best achieved through a diverse radio system. While all existing sectors of the British radio system can make claim to fulfilling some idea of a public purpose for radio, none can adequately do so on their own.

We support the development of sound archives and their accessibility to other broadcasters, scholars and listeners alike. The Network has been active in pursuit of these aims for a number of years. However, we recognise that radio archives are far less developed than those for television and film, and that commercial radio has been significantly neglected in the archiving work that has taken place. Support from Ofcom for a clear strategy for collecting organising and providing access to archives of radio work would be very welcome.