

ESSENTIAL

Commercial references within radio programming



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Executive summary

Background and context

As part of Ofcom's review of its Broadcasting Code, research was commissioned to explore public views on the regulation of commercial references within radio programming. Specifically, the research was commissioned to understand *listener tolerance of promotional activity within editorial content* (i.e. the degree to which radio listeners are prepared to accept references that are subject to commercial arrangements being included *within* programming).

Ofcom currently applies three key principles to its regulation of commercial references within programming: **transparency**, **separation** and **editorial independence**. The key objective of the research was to understand how listeners evaluate such commercial references in programming, and how far these three key criteria remain relevant to radio listeners in today's media climate.

At the time the research was conducted, the three principles were reflected in the following requirements (among others) of Ofcom's Broadcasting Code:

- Radio advertising and programming must be kept separate;
- Independent editorial control of programming must remain with the broadcaster;
- Products and services must not be promoted, or given undue prominence, in programming;
- Sponsors of programming must not influence it in a way that impairs the broadcaster's responsibility and editorial independence;
- In sponsored programming, promotional references to the sponsor (or its products/services) are prohibited and non-promotional references must be incidental; and
- Any programming sponsorship arrangement must be clear to listeners.

A glossary of relevant radio broadcasting terms can be found at the end of this executive summary.

Recruitment and methodology

The complexity and relative unfamiliarity of the subject matter necessitated a deliberative approach, consisting of spontaneous discussion and considered response to an Ofcom presentation and a range of audio stimulus clips prepared by Ofcom. The format of the sessions included a mix of facilitated table discussions and self-completion questionnaires.

Following an exploration of generic attitudes towards commercial radio, and in particular commercial messages, the discussions focussed on responses to a set of audio stimulus clips representing a range of examples of commercial references in programming that are not allowed under current rules but which Ofcom is interested in exploring. For each clip, respondents were asked to record their spontaneous responses and then, after further discussion, to indicate which one of a set of three or four future regulatory scenarios they felt to be most appropriate. A 'Summary of responses to audio examples', recorded individually at each session, can be found at the end of this Executive summary.

Research sessions were conducted at five locations across the UK: London, Belfast, Stirling, Liverpool and Cardiff. Each session involved 31-32 respondents (total sample size: 156). Each session comprised an even mix of male and female respondents, and a spread of ages from 18-60yrs old.

In terms of attitudes and behaviours, a range of radio listening types and listening consumption patterns were included for each session, as follows:

- 50% light/medium commercial radio listeners (5 – 14 hrs per week);
- 50% heavy commercial radio listeners (14+ hrs per week);
- 10 x commercial speech radio listeners per session; and
- 10 x digital radio listeners per session.
- All with active enjoyment of radio;
- All familiar with more than one commercial station;
- No rejectors of ads/commercial activity on radio; and
- No rejectors of ads/commercial activity on any other media.

Key Findings

- Commercial radio is a medium through which most listeners expect to be 'sold to', or receive commercial messages from, whether by spot ads or within programming; the majority understand that this is how commercial radio is funded and accept that this is the 'trade-off' for receiving a free service.
- Among listeners, traditional spot advertising has an immediate association with commercial radio, and is its main defining characteristic. However, spot ad breaks also tend to be regarded negatively; they are considered:
 - to be intrusive / interrupt programme content;
 - to be loosely targeted to a mainstream audience; consequently often irrelevant;
 - to have an overt sales agenda;
 - often to have low production or tonal values; and
 - to be repetitive.
- Commercial references in programming are widely considered to be preferable to spot advertising. As such, sponsor credits are often well-received on the grounds of their brevity, relatively low level of intrusiveness and less overt sales agenda.
- Levels of regulatory awareness in the commercial radio domain are low; most listeners are aware only of programme content-related regulation, driven by recent high-profile cases such as the Russell Brand / Jonathan Ross controversy and TV phone-in scandals. Ofcom's activity and remit in the area of commercial radio regulation is largely unknown and most listeners have never given consideration to whether or how commercial radio advertising is regulated.
- Participants showed a clear appetite for some relaxation of Ofcom's rules concerning commercial references in programming and sponsorship. When asked, in response to audio stimulus, the majority of respondents opted for a change to the status quo. Nevertheless, their openness to any relaxation of Ofcom Broadcasting Code rules was subject to certain caveats, based on the preservation of their *listening experience* and their *listener principles*.

- Of prime importance to listeners is the quality of the listening experience itself. Commercial activity which is deemed to impair the listening experience tends to fall into one of two main camps:
 - it is not relevant to the listening context; and/or
 - it intrudes on the listening experience;
- Alongside the listener experience, listeners hold dear two broad 'listener principles' which demand that any piece of commercial activity:
 - is clearly understood as being commercial in nature; and
 - does not threaten listener trust.
- These listener principles could be summarised as 'clarity and integrity'; and, as acceptance criteria, are broadly in line with Ofcom's three principles of separation, transparency and editorial independence, although with some important exceptions and variations noted in the following paragraphs.
- The main exception is the principle of **separation**. For many, separation represents a barrier to the more integrated type of commercial activity which this research indicates many listeners are welcoming on radio. Listeners are, however, aware of the potential for surreptitious/covert messaging if the principle of separation is not applied. While few consider themselves to be susceptible to this form of advertising, it is felt that more vulnerable members of society such as children or the elderly may be more at risk.
- For this reason, the principle of **transparency** is of paramount importance to listeners; where there is transparency, separation becomes a less important principle. Listeners want to know whether what they are listening to has a commercial agenda or not; this is a fundamental requirement among listeners, if trust in the broadcaster – and indeed the advertiser – is to be retained. Equally, without transparency, the concept of listener choice is felt to be compromised, since there is no clear signpost to switch station (or off) if desired.
- **Editorial independence** is considered to be the most important principle among listeners for a number of reasons. Commercial radio audiences often have long-standing, trusted relationships with their presenters and if they are felt to be delivering 'scripted opinion', listeners feel irritated and let down, or in some cases object to the presenter's role being compromised. The idea that presenter opinion or playlist selection might be directly influenced by a commercial third party is unpalatable for many, particularly if this is not made clear.

Response to audio stimulus

Six audio stimulus clips were prepared by Ofcom. These presented a range of examples of commercial references in programming, grouped under four key headings as follows:

- 1) Commercial references
- 2) Sponsored competitions
- 3) Sponsored feature
- 4) Outside broadcasts

In their assessment of each of the stimulus examples, respondents were asked to indicate:

- how far they personally felt concerned about what they had listened to; on a scale of 1-5, where 1 represented not at all bothered and 5 represented extremely bothered; and
- which of a number of future promotional scenarios they would find acceptable.

Tables presenting this data are included at the end of this Executive Summary. Full data are presented in Appendix F.

Brief summaries of overall responses to each set of stimulus are as follows:

Commercial references in programming:

'Song Download'

Respondents were played an audio clip representative of a contemporary rock music station.

After a music track ended, there was a very brief offer to buy the song as a download.

The offer was pre-recorded.

Details of the offer included the web address from which to access the download.

- This example was well received, largely because of the brevity of the format, which enabled listeners easily to ignore or overlook it, if it was considered irrelevant to them. The issue of separation was not considered a key concern among listeners, as they were able to identify that the offer was subject to a commercial arrangement - particularly as it was pre-recorded and not voiced by the presenter (as a presenter's voice might suggest endorsement of a particular song or company).
- The main concern raised by this sample was that of quality control, i.e. frequency of commercial references. To this end it was suggested that such promotions be restricted, for example to new music releases only, to avoid accusations of intrusiveness/interference with the listening experience.
- There was also some concern relating to the issue of playlist (editorial) control; it was strongly felt that this should be retained by the station i.e. sponsors should not be permitted to dictate which songs should be played and how often.

Sponsored competitions:

'Bond DVD'

Respondents were played an audio clip representative of a contemporary chart music station.

The clip was a listener competition.

The competition was sponsored by a James Bond DVD, to celebrate the release of the DVD.

The competition included extracts from, and questions about, the James Bond film (that had just been released on DVD).

'Department store'

Respondents were played an audio clip representative of a local contemporary chart music station.

The clip was a listener competition.

The competition was sponsored by a well-known department store, to promote one of the store's customer services.

The competition included an interview with a store representative and a question concerning the price of the customer service discussed in the interview.

- Sponsored competitions tended to be welcomed by listeners as they were regarded as entertaining content that offered interaction between listeners and the station – so that the listener 'gets something back'. Where prizes are provided by a commercial third party, most felt that the organisation should be provided with a more extensive promotional opportunity than regulations currently allow. The Bond DVD level of factual reference was regarded as a logical and appropriate example of this.
- Sponsor references within competitions were accepted as long as the quality of overall listening experience was not felt to be compromised. While promotional references were acceptable to many - even to the point of specific sales offers - it was felt that the sponsorship arrangement should not be permitted to overtake the competition itself (as was felt to be the case in the department store example).
- Transparency was again a key concern here; in the department store example respondents felt the feature was too long, contrived, overtly promotional and deliberately designed to blur the line between commercial and editorial content. This was reinforced through perceived extensive presenter involvement/endorsement, which raised questions as to the authenticity of the competition and integrity of the presenters.

Sponsored feature:

'Travel agency'

Respondents were played an audio clip representative of a speech-led local radio station.

The clip was a travel feature.

The travel feature was sponsored by a local travel agency.

The feature included an extended interview with a travel agency representative (in the capacity of an independent expert), at the end of which he promoted in detail a range of the agency's holiday offers.

- In response to this stimulus, the main concern was again that of transparency. It was felt that clear signposting of the promotional nature of the feature upfront would be critical. While it was clear that the specific references to travel deals were

promotional, it was felt that the speaker's unexpected transition from 'independent expert' to 'sales representative' occurred in a somewhat devious manner, without prior warning at the start of the feature. This lack of transparency was considered unacceptable; not least because the representative was felt to use the 'report' section of his feature as a means of building listener trust and interest, heightening the likely impact of his later sales piece.

- The issue of presenter endorsement also emerged through this example. It was widely felt that the involvement of the presenters in endorsing the sponsor's products was inappropriate. This was for two reasons: their interaction with the sponsor representative was felt to mask the commercial nature of the communication and also to compromise their integrity as presenters to some extent, since listeners questioned the authenticity of their views.

Sponsored outside broadcasts:

'St Patrick's Day'

Respondents were played an audio clip representative of an alternative/modern rock music station.

The clip was the opening segment of the station's breakfast show.

To celebrate St Patrick's Day, the breakfast show was an outside broadcast from a brewery.

The outside broadcast was sponsored by the brewer.

The presenters – accompanied by a crowd of their supporters – mentioned the location and the link with St Patrick's Day.

'Theme park'

Respondents were played an audio clip representative of an 'adult contemporary' music station.

The clip was the opening segment of the station's breakfast show (sponsored by an airline).

The breakfast show was an outside broadcast from an international theme park.

The outside broadcast was sponsored by the theme park.

The presenters referred to the theme park and its features a number of times, and introduced a song associated with the theme park owner.

It is important to note that the following observations are based on audience assessment of a short illustrative clip from an outside broadcast that would potentially last several hours; during the deliberative sessions the need to focus on this context (i.e. beyond the example clips played) was emphasised to the respondents.

- Outside broadcasts were regarded as a popular form of programming among listeners; they were recognised as bringing interest and variety to a station's broadcasting and seen as self-contained events.

- There was widespread surprise across the sample at the revelation that the St Patrick’s Day example was not permitted under current regulations. It was felt that such venues should be allowed to pay for their brand, products or services to be mentioned in outside broadcasts that they are sponsoring, and that presenters’ endorsement is acceptable as long as it reflects their genuine views.
- Response to the theme park example tended to be less tolerant overall, for two reasons. The frequency of commercial references throughout the clip (which indicated clearly the nature of the entire broadcast) was felt to be too intrusive, to the point where the quality of the listening experience was compromised. It was also felt that the presenter endorsement in this case was inauthentic and contrived; the idea that the sponsor had paid for these views to be expressed by the presenter was felt to be unpalatable and compromised trust in him.
- It was felt that the theme park example lacked transparency, and the line between editorial and commercial interests lacked sufficient clarity for most.

Summary of responses to audio examples

1) *Summary of levels of concern relating to each example*

The following table illustrates the degree to which respondents indicated concern over the examples they listened to during the research session. These responses were captured at an individual, spontaneous level, prior to any group discussion.

1 = not at all bothered; 5 = extremely bothered¹

'Bothered' scale: mean scores	
Song download	1.6
Bond	1.8
Department store	2.7
Travel agency	3.2
St Patrick’s Day	1.5
Theme Park	2.6

NB: Base size 156 – treat as indicative only

The examples of the department store competition, travel agency feature and theme park outside broadcast emerged as the most problematic.

2) *Summary of preferred future scenarios*

For three of the four types of stimulus played to respondents (i.e. commercial references in programming, sponsored listener competitions and outside broadcasts sponsored by

¹ Based on a total sample of 156 respondents

the venue) we asked them to select one of a number of possible future scenarios (i.e. regulatory options) that Ofcom could consider in its Code review. (NB. For the sponsored feature stimulus, no future scenario options were presented to respondents, as Ofcom was not considering changes to all types of sponsorship on radio, but sought respondents' attitudes to specific issues highlighted in the sample clip.)

In the table below, the 'number of respondents' column contains the overall score for each future scenario option – i.e. number of respondents from a total sample size of 156 (While this is a sufficiently robust figure from which to draw conclusions about the results, it should be noted that these data were gathered as part of a qualitative process and should be seen as indicative of the weight of feeling towards certain scenarios):

Output (stimulus)	Option number	Scenario description	Number of respondents
Commercial Reference	1	current rules continue to apply	35
	2	promotions directly relevant to content are permitted	87
	3	promotions relevant to the station audience are permitted	22
	4	promotions unrelated to station content are permitted	12
Sponsored competition	1	current rules continue to apply	18
	2	sponsor references as a feature of the competition are permitted	81
	3	highly promotional sponsor references are permitted	57
Venue-sponsored outside broadcast	1	current rules continue to apply	2
	2	factual references to the sponsor/venue and its products and services are permitted	94
	3	factual and promotional references to the sponsor/venue and its products and services are permitted	35
	4	factual and highly promotional references to the sponsor/venue and its products and services are permitted	25

NB: Base size 156 – treat as indicative only

1 Background & objectives

Background

Under the Communications Act 2003, Ofcom is required to draw up, and from time to time revise, a code for television and radio which covers standards in programmes, sponsorship, fairness and privacy. Ofcom's first Broadcasting Code ("the Code") came into effect on July 25th 2005. The Code is set out within a framework of European legislation – the Television without Frontiers Directive and Article 10 of the European Convention of Human Rights. From 19 December 2009, Ofcom must ensure that its rules for television broadcasting comply with the new European legislative framework, set out in the Audiovisual Media Services (AVMS) Directive. However, it should be noted that this Directive does not apply to radio.

Since the Code was established, the industry and regulatory environment in which it operates have undergone many changes. Ofcom is currently reviewing the Code according to these changes and will be undertaking a public consultation from June 2009. The purpose of the Code Review project is to ensure that the Code remains fit for purpose and to consider whether changes should be made to the Code **beyond** those required under the AVMS Directive. Ofcom's statutory duty is to remove unnecessary regulation and to ensure that the Code is targeted, consistent and proportionate.

As part of the review, Ofcom is focusing on the issue of commercial references within radio programming. The radio industry has argued that the Code is overly restrictive in relation to commercial freedom and cites an increasingly media-literate public and a proliferation of services (and consequent fall in revenue) in support of its request for a review of the Code – specifically, liberalisation of Section Nine (Sponsorship) and Section Ten (Commercial References and other Matters)².

At the time the research was conducted, the following were requirements (among others) of Ofcom's Broadcasting Code:

- Radio advertising and programming must be kept separate;
- Independent editorial control of programming must remain with the broadcaster;
- Products and services must not be promoted, or given undue prominence, in programming;
- Sponsors of programming must not influence it in a way that impairs the broadcaster's responsibility and editorial independence;
- In sponsored programming, promotional references to the sponsor or its products/services are prohibited; non-promotional references must be incidental; and
- Any programming sponsorship arrangement must be clear to listeners.

A glossary of relevant radio broadcasting terms can be found at the end of this report.

² Section Nine of the Ofcom Broadcasting Code (2005) can be found in Annex 7 at:

<http://www.ofcom.org.uk/consult/condocs/bcode09/main.pdf>

Section Ten Code of the Ofcom Broadcasting Code (2005) can be found in Annex 8 at:

<http://www.ofcom.org.uk/consult/condocs/bcode09/main.pdf>

Research objectives

Ofcom wished to conduct research among commercial radio listeners to help inform the decision-making process about whether the current rules on radio sponsorship and commercial messages remained 'fit for purpose'.

The over-arching objective was to examine whether these requirements of the Code are in line with listeners' current expectations concerning sponsorship and commercial references, or whether they are considered unduly restrictive by listeners.

More specifically, the research was required to explore:

- the role of commercial radio, and attitudes towards it;
- views on current radio sponsorship and commercial messages and perceptions of the relationship between sponsorship and editorial content;
- what listeners know about commercial radio funding and regulations; and
- listeners' reactions to a range of test scenarios of sponsorship and commercial messages that are currently prohibited, to provide a spectrum of listener tolerance.

In order to achieve the final key objective, it was felt that **two key criteria** should be met in terms of the methodology used for this research:

- 1. Participants should be equipped to make informed decisions**
- 2. Participants should be able to assess effectively various options**

To this end, Ofcom commissioned Essential Research to carry out **five deliberative research sessions**, which would provide respondents with the necessary information to evaluate the issues at hand.

2 Methodology & Sample

The deliberative methodology is suited to projects which require respondents to consider alternative perspectives on an issue, to digest new, often complex information, and to discuss this with their peers, before forming a judgment.

The complexity and relative unfamiliarity of the subject matter in this instance necessitated a deliberative approach.

Locations

Following an initial pilot session held in London, four further deliberative discussions took place in Belfast, Stirling, Liverpool and Cardiff.

All sessions were held between 18th and 30th March 2009.

Recruitment

Each session involved 31-32 members of the commercial radio listening public and was structured as follows:

Gender	Male	50%
	Female	50%
Age	18-24yrs	25%
	25-34yrs	25%
	35-44yrs	25%
	45-60yrs	25%
SEG	All BC1C2	

Additional quotas for each session included:

- 50% light/medium commercial radio listeners (5 – 14 hrs per week);
- 50% heavy commercial radio listeners (14+ hrs per week);
- 10 x commercial speech radio listeners per session; and
- 10 x digital radio listeners per session;

- All with active enjoyment of radio;
- All familiar with more than one commercial station;
- No rejectors of ads/commercial activity on radio; and
- No rejectors of ads/commercial activity on any other media.

All participants completed screening questions to check their eligibility. The recruitment screener is available in Appendix A of this report.

Session structure

Each session lasted 4 hours. In addition to debating the issues at hand, paper questionnaires and hand-show exercises were also used to stimulate discussion and provide numerical data to strengthen the weight of evidence.

The format for the sessions included a mix of facilitated table discussions and self-completion questionnaires. Respondents sat in mixed gender groups according to age (as shown above), and comprised people from a range of backgrounds and varying commercial radio consumption habits.

In the facilitated table discussions, respondents worked in groups of around eight, each with a moderator who facilitated the discussion and captured themes on flipcharts and notepads. Handouts were lay-friendly and, in addition to a main presentation, provided information as and when necessary.

To ensure consistency in the presentation of material across tables, the main presentation and all audio stimulus were played to respondents as a single large group, with respondents then continuing their discussions at their individual tables. At the conclusion of each session, each table was invited to summarise briefly its responses to the rest of the room.

All material provided to respondents for information purposes is included in Appendices C, D and E of this report. A general attitudinal questionnaire was also completed by individuals at the start and end of the session.

An outline of the deliberative session structure is provided on the following page. Written summaries of all audio stimulus used throughout the sessions are provided at the start of the relevant sections throughout this report. The discussion guide used for this research is also included in Appendix B.

Tables are presented throughout this report which show the results of self-completion questionnaires relating to the stimulus material played. These questionnaires were intended to capture immediate thoughts prior to group discussion. **It is important to note that the resulting tables are based on an overall score across all regions and age groups i.e. a total of 156 respondents. While this is a sufficiently robust figure from which to draw conclusions about the results, it should be noted that these data were gathered as part of a *qualitative* process and are intended primarily to deliver an overall sense of the balance of opinion across groups. In other words, while the data is valid from a quantitative point of view, it should be regarded only as *indicative* of the weight of feeling towards certain scenarios.**

Outline of the deliberative session structure

Welcome and introduction by Essential Research

Table discussion : Commercial radio generics

Stimulus: Example radio promotion clip medley

Table discussion : Awareness of promotional messages on commercial radio

Ofcom presentation and info handout : Regulation and the commercial radio industry

Table discussion : Response to presentation & perceived importance of regulation

Stimulus : Commercial reference radio example

Table discussion : Response to stimulus

Stimulus : Sponsored competition radio examples x 2

Table discussion : Response to stimulus

Stimulus : Sponsored feature radio example

Table discussion : Response to stimulus

Stimulus : Sponsored outside broadcast examples x 2

Table discussion : Response to stimulus

Summary in plenary

3 Contextual findings

All sessions covered the same discussion content across all locations. They were designed to accommodate both spontaneous opinion as well as to equip respondents with the necessary information to make informed assessments of the stimulus provided.

As noted in the outline session structure above, each session began with spontaneous debate surrounding radio listening behaviour and the significance of commercial radio in the lives of respondents. This was important in setting out the context in which commercial radio is consumed, and establishing key areas of importance for listeners.

Commercial radio consumption

As outlined in the Methodology section, respondents comprised individuals representing a mix of commercial radio listener behaviours. These included speech and music radio listening and light, medium and heavy consumption patterns. Individuals listened to radio in a variety of circumstances: in their cars, at home, at work and during their commute. Commercial radio was felt to serve a range of needs, including for information, entertainment or relaxation, and often simply as a source of reassuring background noise.

The degree to which listeners actively paid attention to radio content was significant because the manner in which individuals habitually consumed commercial radio content tended to impact their views on how influential radio *promotions* could be. Consumption appeared typically to occur on two levels. The first was a largely passive form, as background noise at home or at work – a common characteristic among those who listened predominantly to music-oriented stations. This was a more distracted form of listening behaviour, which some described as ‘dipping in and out’. At a more active level, listeners described their listening behaviour as more engaged, the radio relationship sometimes almost a dialogue between them and their chosen station. These tended to be speech listeners, but could also include those listening to music stations in a more focused way – for example, during breakfast shows. Intensity of consumption varied depending on the situation; for example, those who listened distractedly at work could equally listen intently during their commute home.

It was clear that research participants regarded commercial radio as an important aspect of their daily lives. Many cited strong attachments to or even ‘relationships’ with certain regular presenters – in particular, regarding them almost as companions:

*“I drive to work every morning listening to the radio – you feel you know the presenters.”
London 35-44yrs*

This emotional attachment to presenters was particularly significant to this research, because the strong sense of trust and ‘friendship’ which characterised the listener-presenter relationship had important implications for the question of presenter involvement in promotional material on commercial radio stations. This was a recurring theme as the stimulus was explored in the deliberative sessions, and as such is explored in depth throughout this report.

Commercial radio associations

In most instances, commercial radio signified *local* radio. Consequently, localness was at the heart of response to much of the discussion during these sessions, with specific references to local presenters, weather, news and traffic, local places, communities, local events and heritage and local businesses. This was particularly evident in Belfast, where local community issues appeared of particular importance, and in Liverpool, where radio was viewed as closely intertwined with the city's musical heritage.

Commercial radio had a number of associations among this audience; however its most immediate defining characteristic was felt to be that of advertising – in particular the spot ad break format. To some extent, advertising content of this kind was seen as part and parcel of the commercial radio offering, and the relationship between advertising and funding of the station was widely understood:

"Ads are part of your life, they are necessary for the station to continue – you hate them but you put up with them."
Liverpool 25-34yrs

Other common associations with commercial radio included a perception of lower quality programme content in comparison to the BBC (particularly among older listeners). There was a general sense that commercial radio was in many respects a poor (if fondly regarded) cousin to BBC services. It was strongly associated with general entertainment programming, characterised by jingles, competitions and quizzes. Commercial radio was also widely linked with mass audience targeting, which was felt to be reflected in its typically 'mainstream' music provision. This in turn had implications for people's views on commercial advertising, explored more fully in the next section. Commercial radio playlists were frequently felt to be limited and consequently repetitive, and this was attributed to limited resource and distribution rights. The high proportion of advertising content associated with commercial radio may also have contributed to the overall perception of a lower quality listening experience, since spot ads were frequently criticised for their amateur production quality.

In spite of this, listeners were tolerant of commercial radio's shortcomings and demonstrated high levels of support for their favourite stations. The prime concern of this audience was the preservation, as far as possible, of the quality of their overall listening experience. This related to matters such as programme content and presenter choice; however promotional messages on commercial radio were also felt to have the potential to impact on the listening experience. Radio experiences which did not meet their immediate needs were typically dealt with decisively; commercial breaks in particular were frequently cited as a prompt to switch station or switch off.

Commercial radio and advertising

Spot ads:

This audience generally expected to be 'sold to' in the commercial radio environment and broadly understood that advertising revenue funded commercial radio stations. As noted, the spot ad format dominated listener perceptions of commercial activity, although younger groups tended to be more aware of other formats such as sponsor credits. There was also widespread comment on the self-promotion tactics of commercial radio station, whether through brand reminders or sponsored events. In general, commercial radio was very much regarded as a legitimate sales environment; whether overtly through spot ads or in the more integrated formats of sponsor credits around competitions and other features.

As noted previously, spot ads were a frequent prompt to switching behaviour. They were considered interruptive in their design, repetitive, and often with low production or tonal values:

*"Ads stop the flow of the programme, the pace changes."
Cardiff 45-60yrs*

Spot advertisements were also considered overtly promotional in their approach, in comparison to more subtle commercial messages such as sponsor credits. Owing to the perceived mass-market audience of commercial stations, spot ads were also often considered largely irrelevant in terms of their messages. Perceived irrelevance greatly impacted on tolerance towards this more intrusive advertising format; where ads were felt to be informative or personally relevant they were regarded more positively, in spite of their intrusiveness.

The only advantage of the spot ad format in the eyes of consumers was that it was felt to offer the listener a choice; the sales-oriented agenda of this particular slot of air time was felt to be clearly signalled from the outset, giving consumers the choice of whether to continue listening or not.

Alternative forms of commercial message:

As noted, most did not spontaneously mention alternative commercial formats such as sponsored programming or competitions, which perhaps inherently suggests that these formats are less intrusive to the listening experience than the more commonly cited spot ad. It may also be partly because respondents were unclear as to whether such formats could strictly be termed as 'advertising'. The most commonly cited alternative forms of commercial message included sponsored competitions and sponsor credits generally.

Sponsor credits were considered shorter and less intrusive than spot ads; respondents broadly felt the main role of sponsor credits was to create brand awareness as opposed to make specific sales promotions or 'the hard sell'. Their brevity and lack of overt sales orientation made them seem more conducive to a fluid, enjoyable listening experience. For this reason sponsor credits were considered a preferred form of commercial message.

Sponsored competitions tended to be regarded as programming content, as opposed to commercial activity. This was largely due to their perceived lack of overt sales agenda, their insertion within programming content, the typically high degree of presenter involvement in the competition and the interaction with local listeners. They were often positively regarded on the grounds of the opportunity for local listener interaction and the possibility of prizewinners – a sense of 'getting something back'. Local business involvement was welcomed, and such competitions were widely felt to be fun, involving and sometimes informative; an example of 'why I tune in'.

Respondents were asked to complete a general attitudinal questionnaire as individuals at the start and end of the session. This questionnaire was intended to capture a sense of their views in relation to promotional content on radio, and also to assess whether the discussion itself prompted any significant shift in opinion. Respondents were asked to indicate on a scale of 1-5 how far they agreed with the statements, where 1 = disagree strongly and 5 = agree strongly. The mean scores from this questionnaire are compiled in the following table.

GENERAL ATTITUDINAL QUESTIONNAIRE RESULTS

(Mean scores: 1=disagree strongly and 5=agree strongly)

		Start	End
A	There are too many commercial and sponsorship messages and references on commercial radio these days	3.1	3.0
B	The amount of commercial and sponsorship messages on commercial radio feels about right	2.9	3.1
C	I'm not really bothered about commercial and sponsorship messages on commercial radio, as long as I get to enjoy my favourite music and/or presenters	3.5	3.3
D	It's important that commercial and sponsorship messages are kept well apart from what the presenters are saying or the music they are playing	3.3	3.5
E	I don't mind hearing commercial and sponsorship messages on the radio, as long as the presenter makes it clear when I'm listening to commercial and sponsorship messages and when I'm not	3.3	3.7
F	The quality of commercial radio output is under threat from commercial and sponsorship messages	2.9	3.2
G	Commercial radio stations should be given more freedom to broadcast commercial and sponsorship messages	2.5	2.8
H	It's important that commercial and sponsorship messages are strictly regulated on commercial radio	3.9	4.0

NB: Base size 156 – treat as indicative only

Although regulation of promotional material on air was not something respondents particularly thought about on a day-to-day basis, nor indeed fully understood the workings of, it was clear that it was something they regarded as important (statement H).

There were only two significant attitudinal shifts from the start to the end of the deliberative session; statements E and F. A significant shift in mean scores can be said to reflect a topic which, through discussion and deliberation across the session, respondents identified as being particularly important to them. Thus the increase in agreement with statement E highlights the strength of feeling which emerged among this audience towards the principle of transparency, whilst the increase in agreement with statement F reflects the widespread concern with the quality of listening experience and the fear that this might be eroded.

Ofcom and the regulation of commercial messages

On the whole, the area of regulation of commercial radio was an issue that nearly all respondents felt distanced from and typically gave very little thought to day-to-day. Most passively assumed that commercial arrangements were being monitored either by relevant authorities (which very few were able to name) or by stations themselves. Perhaps partly owing to the distracted manner in which many consumed commercial radio, they did not tend to question commercial messages on any level, assuming that all content must be legitimate; this in part reflected the level of trust they tended to put in their local station.

In general, the concept of radio regulation was only meaningful to this audience in relation to **editorial content** (as opposed to advertising content) – in particular, the safeguarding of social and moral standards. This perception was driven largely by recent high-profile cases of offensive and/or misleading broadcasting practices such as the recent Russell Brand / Jonathan Ross and competition phone-in controversies, and the *Celebrity Big Brother* race row. These were among the few instances where Ofcom's involvement was assumed or recalled.

The concept of regulation in relation to commercial messages – and Ofcom's remit in relation to this - was largely unknown. Respondents spontaneously suggested that regulation of this kind might pertain to the length and volume of advertising, the avoidance of airwave monopolization by larger companies, accuracy and truth in advertising messages and the need to avoid offensive or political content;

*"If you regulate then it creates a level playing field – the underdogs aren't being bullied."
London 25-34yrs*

The importance of regulation with regard to commercial content on radio was widely accepted; though, as many pointed out, it was difficult to know what unregulated commercial content would sound like or what its potential risks might be;

*"I don't really care but if they stopped regulating I'm sure I'd notice."
Cardiff 35-44yrs*

The potential danger to more vulnerable members of society (such as children or the elderly) was mentioned spontaneously; however, on the whole, most felt their own common sense was sufficient to protect them from commercial deception or misinformation;

*"Commercial messages inform you – you can do what you want, you can make up your own mind."
London 35-44yrs*

Concerns in relation to protecting more vulnerable members of society tended to centre around the content of advertisements / commercial messages, rather than how transparent they were.

The Ofcom presentation

Following general discussion, a presentation was delivered to respondents. Compiled by Ofcom, it consisted of a series of slides and covered the following:

- An introduction to Ofcom and its role
- Commercial radio funding & regulation
- Ofcom principles of transparency, separation and editorial independence
- Reasons for the Ofcom Broadcasting Code review
- The changing media landscape
- Implications for listeners
- Consumer protection

The slides were accompanied by a pre-recorded explanation of the issues (read by an Ofcom representative), to ensure consistency of information provided to respondents across locations.

The visual content presented can be found in Appendix C of this report.

During the presentation, respondents were asked to note in particular the significance of the three Ofcom principles of transparency, separation and editorial independence. Definitions of these – as provided to respondents – can be found in the Appendix E. It should be noted that the requirement of this research was not to ask respondents to evaluate material on the basis of the three principles, but merely to make them aware of the considerations currently taken into account by Ofcom when forming decisions or policy. However, the research did seek the relative importance of each principle to respondents.

Overall response

Response to Ofcom's presentation was generally one of surprise. Few had imagined that commercial messages on radio were regulated in the way described. The commercial pressures incumbent on commercial radio stations (see Appendix C) and the potential consequences of these were also largely unknown. In addition, respondents found the role of Ofcom in relation to aspects of its statutory remit revealing:

"I'm surprised Ofcom actually remove unnecessary regulation – I thought it would be the opposite."

Belfast 45-60yrs

The concept of consumer protection was one which had been spontaneously raised in earlier discussions before the presentation, although it had not been labelled as such. Respondents recognised both the basic need for some degree of regulatory protection on commercial radio and the potential risks if the principles of transparency, separation and editorial independence were not adhered to. This was particularly true in relation to the protection of young children. The potential threat to listener trust in commercial radio was clear:

"It's important because it stops things being an advert when you don't realise it."

Cardiff 35-44yrs

"Without regulation it would be a free-for-all – too much advertising. It would be repetitive and boring."

Stirling 18-24yrs

However, it was also felt important that regulation should not stifle creative output or create a 'nanny state' – an environment in which listeners were not given the freedom to evaluate promotional messages as individuals:

"You need to leave people some space to make up their own minds about things... I can make my own mind up about what I'm listening to."

Cardiff 35-44yrs

Feelings about funding problems experienced by commercial radio stations were mixed. On the one hand, there was strong support for local stations and a willingness to accommodate a different approach to commercial material, if that would help safeguard their future. Conversely, some argued that increased financial pressures would effectively weed out 'weaker' stations. This would result in less choice, but potentially a higher quality listening experience among remaining stations. Throughout the sessions, the quality of the listening experience was an ever-present theme, which tended to shape significantly response to the stimulus material. However, respondents generally acknowledged the need to achieve a balance between allowing a higher level of commercial freedom and protecting the listening experience (in terms of both consumer protection and quality).

Regulatory principles

With regard to Ofcom's principles of transparency, separation and editorial independence, views were mixed. This was partly because, while these unfamiliar principles were broadly understood, it was clear that most viewed them as being in some way closely connected and/or interrelated – i.e. not regarded as mutually exclusive. Respondents did not generally find distinguishing the relative significance of each clear-cut. To the inexpert / consumer eye, there was little to distinguish between them. For example, it was felt that if a communication was clearly promotional in nature (i.e. transparent) then, for many, it effectively rendered the material separate from editorial content:

"Separation is important - you do need to know what is fact and what is not. Isn't that the same as transparency though?"
Cardiff 35-44yrs

Nevertheless, transparency and editorial independence typically emerged across all groups as being the most important principles. The risk of being misled or deceived was the prime concern among respondents with regard to commercial radio promotions, which was evident in the response to all the audio stimulus assessed in this research.

Editorial independence was considered to be the most important principle among respondents. As radio listeners, they had strong reservations about permitting advertisers to control or alter editorial content, largely on the grounds that it was not considered their area of expertise and would result in poor quality output. Occasions where editorial control was felt to be compromised for commercial interests were also felt to present a potentially high risk of consumer deception:

"Without editorial independence it wouldn't be a radio station – it would be Coca-Cola FM."
Stirling 18-24yrs

Closely linked to the issue of editorial independence was the question of presenter endorsement of commercial products or services. This was a recurring concern among respondents. Many had long-standing, trusted relationships with radio presenters, and the idea that presenter opinion or playlist selection might be directly influenced by a commercial organisation was unpalatable:

"Presenters often comment on their big nights out in certain clubs and you wonder whether backhanders are being given – these shouldn't be allowed."
Liverpool 45-60yrs

"You come to trust a presenter. If he says he loved a film last night you want to know he is not being sponsored to say it."
Cardiff 35-44yrs

"When you listen to the radio it's about companionship – they are friends. And so it does matter whether they are telling you what they really think. A friendship is about trust."
Cardiff 35-44yrs

A fundamental requirement among listeners was to know whether what they heard had a commercial agenda, if trust in the broadcaster was to be retained. The principle of **transparency** was the second most important principle across all groups of respondents. Many felt that advertising messages were, by their nature, transparent; since the objective of advertising was to promote, respondents felt it was easy to distinguish it from editorial content. However, it was equally acknowledged that there were varying degrees of transparency in other promotional broadcast activity (i.e. within programming), and that listeners should not be obliged to rely too heavily on their own 'radar' in order to protect themselves. Transparency was also found to relate closely to

the issue of trust; respondents found it important that they had confidence in the radio station and, without transparency, they believed such confidence may be compromised:

"It's very important to know where the information is coming from. Honesty and trust are essential."
Liverpool 45-60yrs

"You might feel ripped off if it seemed like independent advice."
Cardiff 35-44yrs

Of all the principles, **separation** was regarded as the least important overall. Respondents were conscious that, in the absence of separation, there may be a risk of being inadvertently 'sold to' – particularly given the distracted way in which commercial radio was often consumed. However, a common view was that, if promotional material was transparent *and* editorially independent, then separation was a less important consideration:

"If you're transparent and conducting editorial content correctly, then separation will naturally occur."
London 25-34yrs

The concept of separation was widely felt to be at odds with an enjoyable listening experience. For many it signified spot ad breaks, which, as noted, were thought intrusive and interfered with listener enjoyment. Listeners wanted editorial content to flow as seamlessly as possible; hence the widespread dislike of the spot ad format:

"I'd prefer ads to be merged without pauses, because it feels like it stops and starts with no continuous flow, which isn't professional."
Liverpool 18-24yrs

The three principles were referred to by respondents throughout the duration of the deliberative sessions. Most tended to apply them loosely, and largely as a means of explaining their own more intuitive response to the stimulus rather than as a rigid set of assessment criteria.

Transparency	8	<p>Average ranking (out of 10) where 1 = unimportant and 10 = extremely important</p>
Separation	6	
Editorial Independence	9	

NB: Base size 156 – treat as indicative only

4 Response to stimulus

The material

Six sample audio stimulus clips were prepared for this research by Ofcom. These comprised a range of examples of commercial references in programming, grouped under four key headings as follows:

- 1) **Commercial references**
- 2) **Sponsored competitions**
- 3) **Sponsored feature**
- 4) **Outside broadcasts**

The clips were all examples of promotional references which are not currently permitted under Code rules. They included a mix of real and fictitious scenarios across a range of commercial radio stations.

Following the Ofcom presentation, the clips were played to respondents. After listening to each clip, respondents were invited to comment on what they had just heard, on both an individual and group level. The stimuli were played in the order shown above.

In their assessment of each of the sample clips, respondents were asked to indicate:

- how far they felt concerned about what they had listened to – on a scale of 1-5, where 1 represented not at all bothered and 5 represented extremely bothered. This information was gathered by *individual completion sheets* prior to any group discussion
- which of a number of future promotional scenarios they would find acceptable. This was captured by a *show of hands* at the end of the discussion around each clip

Tables presenting these data are included in Appendix F of this document.

The listener perspective

During the course of this research it was apparent that much of what listeners heard on commercial radio tended to pass unchallenged. Promotional content in particular was usually absorbed in a non-interrogative, accepting manner. As noted, this was partly due to the distracted way in which many consume radio content, but also a reflection of respondents' trust in commercial radio stations to broadcast only suitable material. This meant that the task of evaluating the radio clips and considering their degree of acceptability was in itself an unusual challenge for respondents; it had never occurred to most to question commercial material on the grounds of how clearly promotional it was.

On the whole, respondents were confident in their own ability to detect and - if desired - deflect advertising messages. Radio advertising in particular was regarded as something of a blunt tool and unlikely to result in surreptitious/covert messaging. The capacity of radio advertising to influence was considered relatively minimal beyond eliciting a very rational response to specific deals or offers. This confidence in consumer judgement conditioned response to the sample audio to some extent, with respondents primarily concerned about the impact of promotional material on their listening experience rather than the risk of being misled or suffering financial detriment.

At the analysis stage of this research, it was clear that respondents had tended to evaluate the clips across four key criteria, broadly based around two areas: the **listening experience** and **listener principles**:

1) Listening experience

- **Relevance to programming**

The promotion does not jar with my programme / my music

- **Non-intrusiveness**

The promotion does not interrupt my listening experience

The quality of the listening experience was the prime concern of respondents in this research. This was felt to be predominantly a concern for radio stations, however, rather than for Ofcom. There was widespread comment on the need for radio stations to ensure that commercial interests were served in a manner that protected the quality of the listening experience as far as possible. Respondents found a clear commercial interest at stake here; a radio station that failed to monitor the quality and interruptive potential of broadcast promotional material would be likely to lose listeners. Respondents considered that any promotional material broadcast in programming should not be too disruptive or poorly executed, or be allowed to dominate the programme itself (whether it be a sponsored competition, sponsored feature or an outside broadcast). The stimuli explored in this research resulted in discussion of these concerns.

Respondents felt that, while remaining compliant with Ofcom regulations, commercial radio stations would need to self-regulate the delivery of promotional content. Throughout this research respondents' most common concerns tended to centre as much around issues of poor execution as regulatory infringement.

2) Listener principles

- **Clarity**

It's clear that what I'm listening to has/will have a commercial slant

- **Integrity**

The trust I have in the presenter/broadcaster/promoter is not under threat

Respondent/listener principles broadly matched two of Ofcom's principles – transparency and editorial independence, the significance of which are discussed under **Regulatory Principles**, above. Separation however, Ofcom's third principle, was considered potentially less important, where the other two principles were appropriately applied. Separation was also felt to conflict with the quality of respondents' listening experience, as it was perceived primarily relevant to the separation of traditional advertisements (in disruptive breaks) from programming.

Details of the overall response to each stimulus clip follow; a table summarising how far each of the clips was felt to meet each of the above listener criteria may be found in Appendix F of this report.

Commercial references in programming (stimulus 1):

'Song Download'

Respondents were played an audio clip representative of a contemporary rock music station. After a music track ended, there was a very brief offer to buy the song as a download. The offer was pre-recorded. Details of the offer included the web address from which to access the download.

Under current rules, this type of promotion is not allowed because there is no adequate separation between the programme content (i.e. the song being played) and the promotion of the download. In other words, the download promotion was not broadcast as a clearly separated advertisement.

Overview of response

There were few objections to the format of this promotion, and widespread surprise that the material was not currently permitted under Code rules. Many believed commercial references of this kind were commonplace on commercial radio, with few able to identify anything that struck them as overtly wrong. The promotion was viewed as practical and useful, particularly with 18-24 year olds:

*"It doesn't do any harm – if anything it was quite useful to know."
London 18-24yrs*

Listening experience

With regard to the listening experience, this example was welcomed for its brevity, subtlety, and perceived relevance for those with an interest in the promoted product. Its brevity also meant that it was tolerable - or at least easy to ignore - for those with no personal interest. Many respondents drew comparisons with the spot advertisement, stating a preference for the sample clip as a more palatable form of promotion.

*"I don't know why that wouldn't be allowed – it was a very smooth transition."
Stirling 45-60yrs*

*"Short and sweet – it was less intrusive – I'd be less likely to switch over."
Belfast 35-44yrs*

*"I prefer that kind of promotion to ad breaks, it's shorter."
Liverpool 25-34yrs*

*"I like the lack of separation; it's less annoying and obtrusive this way."
Cardiff 18-24yrs*

A key listener concern related to the possible frequency of the same, or similar, commercial references. While the format of the promotion was broadly accepted, respondents felt that excessive commercial references in programming of this kind would become an irritation and possibly prompt switching station or switching off:

*"I wasn't too bothered - the whole point of radio is to promote tracks. But I wouldn't want it to be on all songs."
London 25-34rs*

It was felt that a certain degree of self-regulation on the part of the station itself would be necessary in order to avoid this. It was suggested that such promotions should be

restricted, for example to new music releases only or simply at the start and end of a programme, in order to avoid the risk of interrupting the listening experience.

Listener principles

The issue of separation (which this example was intended to highlight) was not considered a concern among respondents, as the sample clip was felt by most to reflect a transparent commercial arrangement. This was partly due to the reference to a major, well-known music download brand, and partly due to its direct call to action. For many, the fact that the promotion was pre-recorded signified a degree of separation – or transparency, as most regarded it:

*"The promo is a pre-recording - it's obviously commercial and that for me is the separation".
25-34yr old, Liverpool*

It was felt important that the download announcement should clearly be pre-recorded material; presenter involvement would blur the line between promotional and editorial content and reduce transparency. It was also felt that, since presenters were potentially influential, their involvement in promoting a product or service might suggest personal endorsement of a particular song or company. This was considered misleading and inappropriate.

The brevity and unintrusiveness of the promotion were welcomed with regard to the listening experience but raised some concern with regard to listener principles. This was due to a perceived potential for surreptitious/covert messaging. A small minority observed that, where commercial messages were less intrusive, they would be inherently less transparent to listeners. However, the vast majority of respondents were confident in their own sense of judgement – and that of others – concerning such promotions..

*"It's no problem for me – if you want it, you can get it."
35-44yrs London*

*"You have the choice of whether to download or not."
Liverpool 45-60yrs*

A minority also expressed concern that the commercial reference in the sample clip was misleading, as there was no reference made to whether the download was free or not. This led to some debate around the nature of the communication; was it information (alerting listeners to a free download) or a commercial promotion (asserting that listeners should pay for the download)? This concern tended to be countered in the group discussion with the argument that advertisers were not generally obliged to detail specific prices, and as long as the communication was transparently commercial in nature there was little danger of being misled.

On prompting, respondents also debated the nature of the commercial arrangement in place. Most did not spontaneously question this; however, it was felt to be unclear who was paying who for the promotion made in the sample clip. This was significant because it questioned the broadcaster's editorial independence. Was the download sponsor paying the station to play certain songs and therefore dictating the playlist? If so, this was considered to be an unacceptable degree of commercial control over programme content, which provoked opposition on two grounds: that it would effectively render the entire song an advert (unpalatable in the eyes of most) and that the editorial integrity of the station would be compromised:

*"If [music download brand] pick the song they are dictating to the radio station what should be played so they are altering the content of the show."
Belfast 25-34yrs*

It was felt to be important that the broadcaster retained control over its music content, which for many characterised the station's identity. If commercial organisations were given the power to control music choice, most felt this would be an unacceptable loss of editorial control, which would negatively impact the listening experience (and consequently the radio listenership).

Future scenarios

Respondents were asked to select one of a number of possible future scenarios (i.e. regulatory options) that Ofcom could consider in its Code review, when considering commercial references in programming.

The following table shows a range of future scenarios that were presented to respondents, together with the results. The final column contains the overall score for each future scenario option (i.e. number of respondents from a total sample size of 156):

1	Current rules apply i.e. this kind of promotion remains an infringement of Ofcom rules	35
2	As long as a promotion is directly relevant to the programming you've just heard, it is considered acceptable by Ofcom (e.g. the example just heard)	87
3	Promotions which are not relevant to the programming you've just heard, but which the radio station feels are relevant to its listeners more generally are considered acceptable by Ofcom (e.g. promotion of a third party's CD that reflects the music more generally heard on the station)	22
4	Commercial promotions which are not necessarily related to any content broadcast on the station are considered acceptable by Ofcom (e.g. a local business / service)	12

NB: Base size 156 – treat as indicative only

In this instance, an overall majority favoured **scenario 2**. This was most marked among the 18-24yr old age group (see Scenario Table by Age in Appendix F), with older age groups demonstrating a slightly stronger inclination to maintain the status quo. This was largely due to concerns about the possible frequency of commercial references and possibly a lower level of perceived personal relevance.

In summary, respondents regarded the kind of commercial reference in the sample clip favourably because of its brevity and relatively seamless integration with programme content. The majority felt there was room for relaxation of current Code rules. The main concerns centred around how such references might be controlled with regard to station playlist control and the frequency of commercial references.

Options 3 and 4 were considered inappropriate, as respondents believed that promotions that did not relate directly to programming would unacceptably disrupt the listening experience.

Sponsored competitions (stimulus 2):

'Bond DVD'

Respondents were played an audio clip representative of a contemporary chart music station. The clip was a listener competition. The competition was sponsored by a James Bond DVD, to celebrate the release of the DVD. The competition included extracts from, and questions about, the James Bond film (that had just been released on DVD).

Under the current rules, references to the sponsor can only be in sponsor credits and the sponsor may not feature in the competition question or content itself.

Overview

As noted previously, sponsored listener competition features were generally welcomed and expected as commercial radio content – the kind of content that listeners tune in for. There was widespread surprise that this kind of promotion was currently not permitted under Code rules. As with the previous sample clip, this was partly because it was felt to be a familiar format; the majority of respondents believed that promotional references of this kind were commonplace on commercial radio. For many, Ofcom's current stance on this type of promotion seemed illogical, both for the listener and the sponsor:

*"If that's not allowed - that's just splitting hairs."
Cardiff 45-60yrs*

Respondents struggled to see how such a promotion could result in any kind of harm to listeners. They also tended to support the right of a sponsor (as a competition prize provider) to some degree of promotion within the sponsored programming. A significant degree of sponsorship involvement in sponsored competitions was expected, and considered part of overall programme content.

Listening experience

The execution in the sample clip was viewed positively and reinforced support for this type of programming. The promotional references were thought to be unobtrusive, suitably brief and not overtly promotional in tone – i.e. the promotion did not detract from the competition itself:

*"With Bond it's still a competition – the (department store) [see below] it was just, 'You are getting these goods'."
Belfast 40-65yrs*

High production values heightened the sense of the promotional content as programming (rather than advertising). From the perspective of the listening experience, this increased respondents' tolerance towards it.

Listener principles

With regard to listener principles, the requirement for sponsor promotions to exist only at the start and/or end of the feature (in sponsor credits) was felt unnecessarily restrictive. The competition was felt to be transparently a commercial promotion even though it was embedded within programming. Of greater importance to listeners was that the presenter seemed sufficiently independent and not felt to endorse personally either the sponsor or its product in a way that seemed scripted and/or false. The competition was felt to preserve a sense of editorial control:

*"If it's relevant and current then having a question relevant to the sponsor makes sense. It could just have easily been the DJ who chose that question because it's relevant."
Cardiff 35-44yrs*

'Department store'

Respondents were played an audio clip representative of a local contemporary chart music station. The clip was a listener competition. The competition was sponsored by a well-known department store, to promote one of the store's customer services. The competition included an interview with a store representative and a question concerning the price of the customer service discussed in the interview.

Under the current rules, references to the sponsor can only be in sponsor credits and the sponsor may not feature in the competition question or content itself.

Overview

In contrast to the previous example, respondents found this sample clip poorly executed and irritating. Concerns largely related to the listening experience, with the promotion described as *'contrived'*, *'over-long'* and *'naff'*. However, there were also concerns on the grounds of a lack of transparency and questionable editorial independence.

Listening experience

Respondents supported in principle sponsors being able to promote relevant offers in detail in sponsored competitions. Promoting prices in programming did not concern listeners but the way in which this was executed in the sample clip was viewed as overtly promotional in tone and described as being *'like a shopping channel'*. This was considered undesirable in programming and intruded on respondents' enjoyment of the competition. While hearing about a sponsor's offers in detail was not in itself a concern, respondents' tolerance was stretched when the on-air promotion of these was seen to affect their listening experience.

Listener principles

The fact that the competition was sponsored by a commercial third party was evident to all. The identity of the sponsor was also deemed transparent by most (even though there was no clear sponsor credit), largely because of the frequency of sponsor references within the competition.

*"That felt like a shopping channel... It's OK though, as long as it's clear who the sponsor is."
London 18-24yrs*

Presenter involvement in the sample clip raised concern; in contrast to the Bond competition, above, presenter commentary appeared to respondents as *'fake'* and *'set-up'* – an example of editorial content being influenced excessively by a sponsor. It was felt to compromise presenter integrity and listener trust, leading some to question the authenticity of the competition – in particular, the participation of the *'alleged'* phone-in listener. In contrast with the Bond DVD competition, respondents felt the extent to which the sponsor had been permitted to influence the competition itself was unacceptable. The material was regarded as a contrived advertising mechanism rather than a competition:

*"It was over the top – the whole thing was just telling me to go to [the store]."
Cardiff 18-24yrs*

*"It's in your face but you know what you are getting. It's not hiding anything."
Cardiff 35-44yrs*

A conflict between the listening experience and listener principles was apparent here. Listeners desired clarity and transparency with regard to a clear promotional agenda, yet required the promotional material itself to fit as seamlessly as possible into programming. Transparency appeared to be significant in this case; separation of the promotion from programme content was not. However, respondents were also keen that any commercial arrangement (and promotional agenda) should have been clear from the outset. For many, there was a sense of being 'lured' into listening to a promotion without adequate signposting:

*"It was a fake competition, an ad in disguise – it felt more like an ad than a competition."
Liverpool 25-34yrs*

*"It was so contrived and fake. They were dressing the ad up as something it's not..."
London 25-34yrs*

Future scenarios

When considering future regulation, a key concern of respondents was to preserve the essence of the sponsored competition as programming and *'what I tune in for'*. Sponsored competitions tended to be regarded as entertaining content, offering interaction between listeners and the station. Where prizes were offered by a commercial third party, most felt that the organisation should be provided a more extensive promotional window than Code rules currently allow. The common view was that sponsors should be allowed to have competition content structured to some extent around their product or brand, as in the Bond DVD sample clip. This level of commercial reference was regarded as logical and appropriate. Specific references to promotional offers including pricing were also considered acceptable. However, overt, extended sales pitches, which compromised the nature of the competition itself (as illustrated in the department store clip) were not. Respondents supported presenter involvement, but not to the extent that sponsors could dictate their opinion or delivery, which could compromise their integrity and risk a breach of listener trust.

Respondents were asked to select one of a number of possible future scenarios (i.e. regulatory options) that Ofcom could consider in its Code review, when considering sponsored listener competitions.

The following table shows a range of future scenarios that were presented to respondents, together with the results. The final column contains the overall score for each future scenario option (i.e. number of respondents from a total sample size of 156):

1	<i>Do not allow references to sponsors within competitions (current)</i>	18
2	<i>Allow references to the sponsor as a feature of the competition question/content (as per Bond DVD)</i>	81
3	<i>Allow highly promotional references (i.e. prices etc.) to the sponsor as a feature of the competition question/content (as per Department Store)</i>	57

NB: Base size 156 – treat as indicative only

Again, an overall majority of respondents favoured **scenario 2**. However, a significant number of respondents favoured scenario 3. This was reflected across all age groups with the exception of 25-34yr olds, who were firmly in favour of scenario 2.

The balance of opinion was not clear-cut, illustrating a relative degree of ambivalence across the audience. As long as promotional material was relevant and was not felt to impede programming (i.e. by allowing a sales pitch for a sponsor to dominate a sponsored competition), respondents appeared comfortable with the inclusion of more overt promotional messages. That over half the sample chose scenario 2, however, probably reflected their concern over the potential for sponsors to impede a broadcaster's editorial independence.

Sponsored feature (stimulus 3):

'Travel agency'

Respondents were played an audio clip representative of a speech-led local radio station. The clip was a travel feature. The travel feature was sponsored by a local travel agency. The feature included an extended interview with a travel agency representative (in the capacity of an independent expert), at the end of which he promoted in detail a range of the agency's holiday offers.

In this clip, the travel agent paid to be featured on the station in this way as part of a weekly feature. This is currently not allowed for two reasons: it was not transparent that the programming was sponsored/funded and neither a sponsor nor its products/services can be promoted within programming.

Overview

This clip resulted in the strongest and most negative reaction from respondents, on the grounds of both listener principles and listening experience. There was some appetite for hearing about the sponsor's offers in detail, and a feature of this kind was felt to be a potentially effective and acceptable commercial vehicle for local shops and services. However, the delivery in this sample clip caused concern.

Listening experience

Delivery of the feature was considered poor. In particular, the promotional segment was considered too long, lacking in personal relevance and a 'turn-off' for respondents. The presenter involvement towards the end of the promotion was also considered stilted and inauthentic, which led some respondents to question whether his comments genuinely reflected his own view.

Listener principles

There appeared to be a widespread sense of deception from respondents. While it was clear by the end of the sample clip that the feature was sponsored, most felt this should have been clearly signalled at the outset. This lack of transparency had two implications. It meant that the representative of the sponsor gained the confidence of listeners, under the guise of a presumed objective and independent guest reporter, before his real agenda became apparent. It also meant that the respondents were not given the cue to switch station/off from the outset, if they wished to. Respondents considered that a clear sponsor credit was crucial, to alert listeners that the following interview was part of a wider sales pitch:

*"I felt conned. I was drawn in thinking it was about travel news and then got a spiel about a travel company."
Liverpool 35-44yrs*

*"The problem is that it's not clear at the start. It's done very sneakily. It's like a decoy – I felt tricked into listening."
London 25-34yrs*

*"I felt misled – you think you are listening to information but it turns out to be someone selling – no separation or transparency."
45-60yr old, Cardiff*

Respondents considered that the long preamble and journalistic tone of the sample clip was designed to gain their trust and then 'hijack' an apparently independent report with a sales promotion. They also found the content irritating, as political statements concerning Heathrow's Terminal 5 (the main subject of the interview) appeared to be exploited for commercial purposes. In particular, the sponsor joked about "direct flights" (from Edinburgh) being available from his travel agency, as opposed to having to travel to Heathrow:

*"It seems deceitful to lure listeners in through the Heathrow issue. He gets the public on his side with a common view point and then lures them into listening to the deals."
Belfast 25-34yrs*

*"Devious. He's being given credibility at first and then he is advertising – I would feel deceived."
Cardiff 35-44yrs*

*"It started like a news story and then morphed into a sales pitch... Using the Terminal 5 story as a means of selling holidays is misleading, devious."
Cardiff 45-60yrs*

Presenter endorsement caused concern, interaction with the sponsor representative being considered inauthentic and too enthusiastic. The involvement of the presenters was also felt to blur the line between the promotional message and the editorial content. While it was accepted that the entire feature was sponsored, respondents believed it was inappropriate for presenters to adopt an apparent sales role. Presenters' independence was highly valued and such promotional involvement was considered to raise potentially

negative, wider-reaching consequences with regard to the listener's relationship with the station:

*"The DJs are interacting – you feel they are owned by the sponsor which makes you question when else they are being led by sponsors. It makes them seem fake."
Cardiff 35-44yrs*

*"It's bad that the presenters are getting involved. They are not going to criticise the guest but they should remain impartial."
Liverpool 25-34yrs*

*"It was the false conversation – it compromises the integrity of the station and the presenters.... It would be OK for someone to pay and try to sell stuff – but the bogus conversation is wrong."
Cardiff 18-24yrs*

Respondents were more comfortable with the format of what they had heard when told that it was a weekly feature, since this could alert listeners to its nature/intent. However, the fact that it was a weekly feature had been mentioned in the audio but missed by most

Future scenarios

No future scenarios were considered in this case.

Nevertheless respondents clearly sought appropriate signalling of any sponsorship arrangement at the outset and believed that presenter involvement, if allowed, should be minimal and impartial. Some rejected the format outright, believing that a transparent sales promotion (without any preamble) would be more effective; however, they recognised that this would effectively render the promotion an advertisement.

Sponsored outside broadcasts (stimulus 4):

It is important to note that the following observations are based on audience assessment of a short illustrative clip from an outside broadcast programme which would potentially last several hours; during the deliberative sessions the need to focus on this context was emphasised to respondents.

'St Patrick's Day'

Respondents were played an audio clip representative of an alternative/modern rock music station. The clip was the opening segment of the station's breakfast show. To celebrate St Patrick's Day, the breakfast show was an outside broadcast from a brewery. The outside broadcast was sponsored by the brewer. The presenters – accompanied by a crowd of their supporters – mentioned the location and the link with St Patrick's Day.

This is not currently permitted because promotional references to sponsors or their products or services are not allowed within sponsored programming and non-promotional references must be editorially justified and incidental. (Sponsor references are limited to being in sponsor credits and may not feature significantly in the sponsored programming itself.)

References to a venue, as sponsor of an outside broadcast from that venue, are not therefore permitted, as they are not incidental.

Overview

Outside broadcasts were regarded as a popular form of promotional content among respondents; they were felt to bring interest and variety to a station's broadcasting and, as with sponsored competitions, were regarded as programming content, not advertising. Any reference to the sponsor/venue in an outside broadcast was considered relevant to the context and appropriate to the feature. As with sponsored competitions, respondents felt it was logical for venues to sponsor an outside broadcast and they would expect the sponsoring venue to receive references within that broadcast in return.

Listening experience

It should be noted that the generic appeal of outside broadcasts (as an enhanced listening experience) and the ubiquity and favourability of the commercial brand featured in this example contributed to its overall acceptance.

Respondents generally wanted to hear about the venue (i.e. the sponsor), and questioned why presenters should not refer to it;

*"With an outside broadcast you expect them to tell you where they are... You have to say something about the location otherwise it would be really strange."
Stirling 45-60yrs*

*"It seems daft if you're at a venue not to mention the venue and its products."
Cardiff 35-44yrs*

Listener principles

There was widespread surprise that the St Patrick's Day material was not currently permitted under Ofcom Broadcasting Code rules. No issues were raised with the sample clip either on the grounds of listener principles or in terms of its execution and respondents generally believed the type of sponsor references likely to be made throughout the outside broadcast were commonplace and presented no risk of harm to listeners:

*"The location was mentioned, and it was good and relevant... It was linked to St Patrick's Day, which made it relevant."
Liverpool 35-44yrs*

*"It was more about the day and less about the product."
Cardiff 18-24yrs*

It was felt that there were no overtly promotional references, which contributed to its appeal. The sample clip was considered short and factual, and the presenter reference to the sponsor's brand was felt to be sufficiently independent and neutral.

*"They mentioned where they were coming from – 'We're here'. There was no deceit. The presenter didn't have to say, 'I like (sponsor brand) and I drink it every Tuesday.'
Belfast 25-34yrs*

'Theme Park'

Respondents were played an audio clip representative of an 'adult contemporary' music station. The clip was the opening segment of the station's breakfast show (sponsored by an airline). The breakfast show was an outside broadcast from an international theme park. The outside broadcast was sponsored by the theme park. The presenters referred to the theme park and its features a number of times, and introduced a song associated with the theme park owner.

This is not currently permitted because promotional references to sponsors or their products or services are not allowed within sponsored programming and non-promotional references must be editorially justified and incidental. (Sponsor references are limited to being in sponsor credits and may not feature significantly in the sponsored programming itself.)

References to a venue, as sponsor of an outside broadcast from that venue, are not therefore permitted, as they are not incidental.

Overview

Response to the theme park sample clip tended to be less positive, on the grounds of both the listening experience and listener principles. It should be noted that the brand in question tended to polarise respondents' reactions more than in the case of St Patrick's Day, above. This may have had an impact on their response.

Listening experience

The clip was considered upbeat and atmospheric, with the presenters enthusiasm being 'in the spirit of things'. In many respects, the clip illustrated what many cited as the main appeal of outside broadcasts: a lively and jovial event, with varied content. However, the likely frequency of sponsor references throughout the broadcast (based on the sample clip) was felt to be excessive and likely to compromise the quality of the listening experience:

*"It was too much [sponsor brand] down your throat at every opportunity. [The programme] was almost consumed by the brand.
Liverpool 45-60yrs*

*"That was more like an ad but using presenters."
Cardiff 45-60yrs*

As with sponsored competitions, respondents appeared content for promotional material to form part of the programming. However, they did not believe the sponsor should dominate the broadcast. This sample clip appeared to represent unacceptable sponsor control of the programme, which was considered intrusive by many respondents

Listener principles

Respondents questioned the broadcaster's editorial independence and integrity. They believed the sponsorship arrangement was transparent to listeners by the frequency of sponsor references but respondents were concerned by the degree to which the presenters appeared to endorse the sponsor:

"On the one hand they're obviously selling something but it's not clear how far they're selling it – the presenter involvement is blurring the line between the programme and the ads."

London 25-34yrs

The presenters were particularly enthusiastic about the sponsor/venue and many respondents suspected that their views had been scripted, in contrast to St Patrick's Day, above. Presenter endorsement was felt to be inauthentic and contrived:

"If you are paid to say something you don't agree with then you are on dodgy ground."
45-60yr old, Liverpool

While respondents considered it acceptable for presenters to offer their own opinions on sponsors and their products/services, they did not consider it acceptable for presenters' views to be controlled or influenced by the sponsor. The idea that the sponsor had paid for such views to be expressed was considered unacceptable and to compromise listeners' trust in both the station and the presenters:

"It wasn't clear whether the presenters were giving their actual opinion or being made to say these comments... If they are at the venue and experiencing it for themselves and these are their own opinions then it's fine – it's not deceitful."
Belfast 25-34yrs

"That was like brainwashing. The DJs were being forced to say things – it spoils what you respect about them and expect, that they say what they believe."
Cardiff 35-44yrs

"It sounded as though you had switched onto [sponsor brand] FM. It had no integrity at all, it was so obviously scripted."
London 25-34yrs

"It felt like [the sponsor] wrote the show."
Belfast 25-34yrs

When asked, respondents found it unclear whether the presenters had been paid directly for mentioning the sponsor so frequently on air but generally considered the notion of such an arrangement unacceptable. On a broader level, however, respondents believed that sponsors should be allowed to pay (the broadcaster) for their brand and/or products or services to be mentioned in outside broadcasts, and considered presenter endorsement acceptable, where it reflected their genuine views:

"You know that DJs aren't supposed to talk about places or products or brands, but they sometimes do and that's normal. They are people and they would probably do that in real life so it's fine."
London 18-24yrs

Nevertheless, most respondents acknowledged that negative presenter comment would be highly unlikely and that the cause of presenter endorsement (whether genuine or paid-for) would be difficult to assess:

*"It would be fine if they offered an honest view. But they aren't going to turn around and say, 'This ride is great but the ghost train is s**t' are they?"*
Cardiff 25-34yrs

Future scenarios

Respondents were asked to select one of a number of possible future scenarios (i.e. regulatory options) that Ofcom could consider in its Code review, when considering outside broadcasts sponsored by the venue.

The following table shows a range of future scenarios that were presented to respondents, together with the results. The final column contains the overall score for each future scenario option (i.e. number of respondents from a total sample size of 156):

1	Current rules remain unchanged (i.e. outside broadcasts cannot be sponsored by the venue)	2
2	Factual references to the sponsoring venue and/or its products or services are permitted (e.g. as in the [St Patrick's Day] clip)	94
3	Factual and promotional references to the sponsoring venue and/or its products or services are permitted (e.g. [Theme Park] clip)	35
4	Factual and highly promotional references to the sponsoring venue and/or its products or services are permitted (e.g. at the opening of a local superstore, prices and benefits of products are prominently featured)	25

NB: Base size 156 – treat as indicative only

The majority of respondents favoured **scenario 2**; factual references in the body of the commentary were considered acceptable. However, in discussion, more respondents appeared to favour allowing limited promotional references to the sponsor (as the venue) within outside broadcasts, but this was conditional upon presenters' views remaining genuine and references to the sponsor and/or its products or services not dominating the programme. It was generally considered that the sponsor's influence over programme content should be minimal. Younger respondents (18-24yr olds) were particularly keen that the sponsor did not influence a broadcaster's music playlist.

5 Conclusions

The regulation of commercial references within programming did not appear to be a key concern to respondents when listening to the radio while, by contrast, the quality of their listening experience and the safeguarding of basic social/moral standards appeared paramount. Irritation with spot advertising tended to make respondents more open to hearing less intrusive commercial content on radio. Listeners therefore appeared ready for some relaxation of Ofcom's rules concerning commercial references in programming and sponsorship. When asked, in response to audio stimulus, the majority of respondents opted for a change to the status quo. Nevertheless, their openness to any relaxation of Ofcom Broadcasting Code rules was subject to certain caveats, based on the preservation of their listening experience and their listener principles.

Although not within Ofcom's remit, respondents could not put aside the quality of their listening experience when reacting to the audio stimulus clips. Ultimately, their listening experience was what appeared to matter to them. They were asked to consider commercial activity within programming (not advertising), so the quality of that programming was naturally judged as part of that experience.

Respondents' own principles (summarised as clarity and integrity) were broadly in line with Ofcom's three principles (editorial independence, transparency and separation). However, **separation**, which was regarded as the least important of Ofcom's principles, generally appeared synonymous with traditional advertising breaks, which were felt to be intrusive and therefore to interfere with listener enjoyment. Separation was seen to represent a barrier to the more integrated type of commercial activity that respondents appeared to welcome on radio. If transparency was achieved, separation became less important. However, fear of a movement towards surreptitious/covert commercial messaging made transparency all the more important.

Transparency emerged as the second most important of Ofcom's principles; listener choice was seen to be compromised without it, since there was no signpost to switch station or switch off, if desired. Respondents also considered a lack of transparency opened the door to being misled.

Respondents considered **editorial independence** to be the most important of Ofcom's principles for a number of reasons. Respondents generally felt they had long-standing, trusting relationships with regular presenters. If presenters were felt to be delivering 'scripted opinion', respondents felt irritated, let down or protective of them (for being told what to say). Also, the idea that presenter opinion or playlist selection may be directly influenced by a commercial arrangement was unpalatable for many; 'That's not what we've tuned in for' was a common sentiment.

Glossary of radio broadcasting terms

Editorial	See Programming .
Editorial Independence	(A regulatory principle) To ensure that programming is not distorted for commercial or other purposes. To this end, the broadcaster must maintain editorial control over <u>all</u> programming (i.e. including sponsored programming).
Outside broadcast	Programming broadcast from a remote location. It is usually live and is characterised by the lead presenter(s) hosting it from a venue other than the studio.
Playlist	The list of music tracks from which songs played by a radio broadcaster are selected.
Principles	Ofcom's regulatory principles are enforced through current rules. The principles concerning commercial references in programming (including sponsored programming) are transparency , separation and editorial independence .
Programming	Sometimes referred to as 'editorial', programming is all radio output (including sponsorship, programme trails etc.) apart from advertisements. It comprises programmes (e.g. a Breakfast Show), music, and features (e.g. weather).
Separation	(A regulatory principle) Advertising should be kept separate and distinct from programming . To this end, sponsor credits should also be clearly identifiable as such around (and sometimes within) programming .
Sponsor	Any body that gives payment (or equivalent) to the broadcaster to be associated with specific programming , with a view to promoting itself through that association.
Sponsor credit	Sometimes referred to as a 'sponsorship credit', this is a brief branding statement that lets the listener know a sponsor has a commercial association with specific programming (i.e. a specific show or a specific feature). A sponsor credit may include phrases such as "brought to you by...." or "in association with..." to identify the sponsorship arrangement.
Sponsored competition	Sometimes referred to as a 'radio promotion' (by the radio industry), this is an example of a sponsored feature. Generally, the sponsor not only pays to be associated with the competition but also donates the prize(s) on offer.
Sponsored programming	A programme (or set of programmes) or a feature (or set of features) that has received funding for its production from a sponsor .
Spot Advertisement	Sometimes referred to as a 'commercial' or 'spot ad', this is an advertisement found in an advertising break.
Transparency	(A regulatory principle) Any commercial association with programming (generally sponsorship) should be made clear to listeners (e.g. in the case of sponsorship, transparency is achieved by the inclusion of sponsor credits).

ESSENTIAL

Appendices

**APPENDIX A:
RECRUITMENT SCREENER**

Q1. Have you ever taken part in a group discussion or in an interview?
Yes /_____/ No /_____/

If yes, what was it about?

If subject close to the research: **CLOSE**

When was it?

If less than 6 months: **CLOSE**

CLOSE IF SUBJECT RELATED TO RESEARCH TOPIC OR IF LESS THAN SIX MONTHS

Q2a. How old are you? Mention age clearly /_____/

Q2b. Date of Birth _____ / _____ / _____

9 X RESPONDENTS PER GROUP MUST BE AGED 18-24 YEARS, IF NOT PLEASE CLOSE

9 X RESPONDENTS PER GROUP MUST BE AGED 25-34 YEARS, IF NOT PLEASE CLOSE

9 X RESPONDENTS PER GROUP MUST BE AGED 35-44 YEARS, IF NOT PLEASE CLOSE

9 X RESPONDENTS PER GROUP MUST BE AGED 45-60 YEARS, IF NOT PLEASE CLOSE

PLEASE ENSURE A GOOD SPREAD OF AGES ARE COVERED ACROSS ALL GROUPS

Q3. What is your occupation? And your partner's? In which sector? And your partner's?

Respondent /_____/ /_____/

Partner /_____/ /_____/

SOCIAL GRADE-BASED ON HOH OCCUPATION

B []

C1 []

C2 []

ALL RESPONDENTS MUST BE B/C1/C2, IF NOT PLEASE CLOSE

PLEASE ENSURE A GOOD SPREAD OF SEG IS COVERED ACROSS ALL GROUPS

Q4. Do members of your family or close friends work/used to work in any of the following professions or occupations?

	YES	NO
AN ADVERTISING AGENCY OR PUBLIC RELATIONS COMPANY	CLOSE	
MARKETING OR MARKET RESEARCH COMPANY	CLOSE	
JOURNALISM/ PRESS	CLOSE	
RADIO PRODUCTION	CLOSE	
RADIO STATIONS	CLOSE	
RADIO BROADCASTING	CLOSE	

**** IF YES TO ANY ABOVE, PLEASE CLOSE INTERVIEW****

Q.5 Can I check that you have been resident in the U.K for at least 3 years and have a good command of English?

YES

NO **CLOSE**

Q.6a GENDER

MALE

FEMALE

18 X RESPONDENTS PER GROUP MUST BE MALE, IF NOT PLEASE CLOSE

18 X RESPONDENTS PER GROUP MUST BE FEMALE, IF NOT PLEASE CLOSE

Q.6b ETHNICITY

White –

British Irish European Eastern European Other white background

Mixed –

White and Afro Caribbean

White and Black African

White and Asian

Any other Mixed background

Asian or Asian British -

Indian Pakistani Bangladeshi Southern Asian

Any other Asian background

Black or Black British -

Caribbean African Any other Black background

Chinese or other ethnic group

Chinese Other

GROUP 1:

8-10 X RESPONDENTS MUST BE OF AN ETHNIC MINORITY, IF NOT PLEASE CLOSE

GROUPS 2, 3, 4 & 5:

AT LEAST 2 AND UP TO 5 X RESPONDENTS MUST BE OF AN ETHNIC MINORITY, IF NOT PLEASE CLOSE

Q.7a Please can you tell me which of the following you have and use in your home?

- a) Terrestrial TV (channels BBC1, BBC2, ITV1, Channel 4, Channel 5 only) []
- b) Digital TV (e.g. freeview, Sky, Virgin) []
- c) Radio (normal radio set or part of a hi-fi) []
- d) DAB Radio (radio set receiving radio stations digitally e.g. Pure, Roberts) []
- e) Computer / Laptop []
- f) Mp3 player / iPod []
- g) Internet / Broadband []

ALL RESPONDENTS MUST CODE C) &/OR D) AND HAVE AND USE A RADIO IN THEIR HOMES, IF NOT PLEASE CLOSE

Q.7b You say you have and use a radio in your home, can you please tell me how else you listen to the radio?

- a) In the Car []
- b) Through a mobile phone []
- c) Through MP3 player/ iPod/ iPhone []
- d) Through digital TV []
- e) Through the internet []
- f) Through DAB radio []

ALL GROUPS:
10 X RESPONDENTS MUST CODE AT LEAST 1 OF THE LISTED RADIO DEVICES LISTED FROM C) – F), IF NOT PLEASE CLOSE

Q.7c Thinking specifically about different types of radio stations now, can you please tell me which of the following radio stations you ...

- | | | | |
|--|--------------|----------------------|-----|
| 1) <u>Currently</u> listen to | | | |
| 2) <u>Used to listen to</u> in the past, but no longer do | | | |
| 3) <u>Would never</u> listen to (Reject) | | | |
| | 1) Listen to | 2) Used to listen to | 3) |
| Reject | | | |
| a) Any Local Commercial Music stations | [] | [] CLOSE | [] |
| CLOSE
(e.g. London – Capital 95.8FM, Choice FM
Liverpool – Radio City, Juice
Stirling – Clyde1, Forth 1
Belfast – City Beat, Cool FM
Cardiff – Red Dragon, The Wave) | | | |
| b) Any Local Commercial speech stations | [] | [] CLOSE | [] |
| CLOSE
(e.g. London – LBC
Liverpool – City Talk
Stirling – Real Radio Scotland
Belfast – U105
Cardiff – Real Radio Wales) | | | |
| c) Any National Commercial stations
(e.g. Classic, Absolute, Talksport) | [] | [] CLOSE | [] |
| CLOSE | | | |
| d) Any BBC radio station
(e.g. Radio 1, Radio 2) | [] | [] | [] |
| e) Any Pirate radio station | [] | [] | [] |
| f) Any Digital radio stations | [] | [] | [] |
| CLOSE
(e.g. Heat, Kerrang, Planet Rock) | | | |

NOTE TO RECRUITER: PLEASE SEE SPECIFIC LOCAL STATION LIST FOR PROMPT

PLEASE ENSURE A GOOD SPREAD OF RESPONDENTS ARE CODING 1) @ A), B) &/OR C) PER GROUP, AND ARE CURRENTLY LISTENING TO LOCAL COMMERCIAL MUSIC RADIO STATIONS, LOCAL COMMERCIAL SPEECH RADIO STATIONS &/OR NATIONAL COMMERCIAL RADIO STATIONS, IF NOT PLEASE CLOSE

PLEASE ENSURE AT LEAST 10 X RESPONDENTS PER GROUP ARE CODING 1) @ B) AND CURRENTLY LISTEN TO COMMERCIAL SPEECH RADIO STATIONS, IF NOT PLEASE CLOSE

AT LEAST 10 X RESPONDENTS PER GROUP MUST CODE 1) @ F) AND CURRENTLY LISTEN TO DIGITAL RADIO STATIONS, IF NOT PLEASE CLOSE

ASK GROUP 1 – LONDON RESPONDENTS ONLY

Q.7di You say you listen to commercial radio stations, can you now please tell me how often you listen to each of the following stations for ...

- 1) less than 5 hours per week
- 2) between 5-14 hours per week
- 3) over 14 hours per week

		1) less than 5 hrs	2) 5-14 hrs
		3)14+ hrs	
a)	Capital 95.8 []	[]	[]
b)	Choice FM []	[]	[]
c)	LBC []	[]	[]
d)	LBC News []	[]	[]
e)	Heart []	[]	[]
f)	XFM []	[]	[]
g)	Kiss []	[]	[]
h)	Magic []	[]	[]
i)	Gold []	[]	[]
j)	Classic FM []	[]	[]
k)	Talksport []	[]	[]
l)	Absolute []	[]	[]

RESPONDENTS CODING 1 RADIO STATION ONLY MUST CODE 2) OR 3), AND LISTEN TO THIS RADIO STATION FOR A MINIMUM OF 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

RESPONDENTS CODING MORE THAN 1 RADIO STATION CAN CODE 1), 2) OR 3), AND BE LISTENING TO ANY AMOUNT OF HOURS AS LONG AS IT TOTALS OVER 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

PLEASE AIM FOR A GOOD SPREAD OF RADIO STATIONS COVERED ACROSS THE GROUP

ASK GROUP 2 – LIVERPOOL RESPONDENTS ONLY

Q.7dii You say you listen to commercial radio stations, can you now please tell me how often you listen to each of the following stations for ...

- 1) less than 5 hours per week
- 2) between 5-14 hours per week
- 3) over 14 hours per week

	1) less than 5 hrs	2) 5-14 hrs	3)14+ hrs
a) Radio City	[]	[]	[]
b) Juice	[]	[]	[]
c) Mersey	[]	[]	[]
d) City Talk	[]	[]	[]
e) Century	[]	[]	[]
f) Magic	[]	[]	[]
g) Gold	[]	[]	[]
h) Classic FM	[]	[]	[]
i) Talksport	[]	[]	[]
j) Absolute	[]	[]	[]

RESPONDENTS CODING 1 RADIO STATION ONLY MUST CODE 2) OR 3), AND LISTEN TO THIS RADIO STATION FOR A MINIMUM OF 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

RESPONDENTS CODING MORE THAN 1 RADIO STATION CAN CODE 1), 2) OR 3), AND BE LISTENING TO ANY AMOUNT OF HOURS AS LONG AS IT TOTALS OVER 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

PLEASE AIM FOR A GOOD SPREAD OF RADIO STATIONS COVERED ACROSS THE GROUP

ASK GROUP 3 – STIRLING RESPONDENTS ONLY

Q.7diii You say you listen to commercial radio stations, can you now please tell me how often you listen to each of the following stations for ...

- 1) less than 5 hours per week
- 2) between 5-14 hours per week
- 3) over 14 hours per week

	1) less than 5 hrs	2) 5-14 hrs	3)14+ hrs
a) Clyde 1	[]	[]	[]
b) Cylde 2	[]	[]	[]
c) Forth 1	[]	[]	[]
d) Forth 2	[]	[]	[]
e) Real Radio Scotland	[]	[]	[]
f) Galaxy	[]	[]	[]
g) XFM	[]	[]	[]
h) Classic FM	[]	[]	[]
i) Talksport	[]	[]	[]
j) Absolute	[]	[]	[]
h) Central FM	[]	[]	[]

RESPONDENTS CODING 1 RADIO STATION ONLY MUST CODE 2) OR 3), AND LISTEN TO THIS RADIO STATION FOR A MINIMUM OF 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

RESPONDENTS CODING MORE THAN 1 RADIO STATION CAN CODE 1), 2) OR 3), AND BE LISTENING TO ANY AMOUNT OF HOURS AS LONG AS IT TOTALS OVER 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

PLEASE AIM FOR A GOOD SPREAD OF RADIO STATIONS COVERED ACROSS THE GROUP

ASK GROUP 4 – BELFAST RESPONDENTS ONLY

Q.7div You say you listen to commercial radio stations, can you now please tell me how often you listen to each of the following stations for ...

- 1) less than 5 hours per week
- 2) between 5-14 hours per week
- 3) over 14 hours per week

	1) less than 5 hrs	2) 5-14 hrs	3)14+ hrs
a) City Beat	[]	[]	[]
b) Cool FM	[]	[]	[]
c) Downtown	[]	[]	[]
d) U105	[]	[]	[]
e) Classic FM	[]	[]	[]
f) Talksport	[]	[]	[]
g) Absolute	[]	[]	[]

RESPONDENTS CODING 1 RADIO STATION ONLY MUST CODE 2) OR 3), AND LISTEN TO THIS RADIO STATION FOR A MINIMUM OF 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

RESPONDENTS CODING MORE THAN 1 RADIO STATION CAN CODE 1), 2) OR 3), AND BE LISTENING TO ANY AMOUNT OF HOURS AS LONG AS IT TOTALS OVER 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

PLEASE AIM FOR A GOOD SPREAD OF RADIO STATIONS COVERED ACROSS THE GROUP

ASK GROUP 5 – CARDIFF RESPONDENTS ONLY

Q.7dv You say you listen to commercial radio stations, can you now please tell me how often you listen to each of the following stations for ...

- 1) less than 5 hours per week
- 2) between 5-14 hours per week
- 3) over 14 hours per week

	1) less than 5 hrs	2) 5-14 hrs	3)14+ hrs
a) Red Dragon	[]	[]	[]
b) Swansea Bay Radio	[]	[]	[]
c) The Wave	[]	[]	[]
d) Real Radio Wales	[]	[]	[]
e) Gold	[]	[]	[]
f) Kiss	[]	[]	[]
g) Classic FM	[]	[]	[]
h) Talksport	[]	[]	[]
i) Absolute	[]	[]	[]

RESPONDENTS CODING 1 RADIO STATION ONLY MUST CODE 2) OR 3), AND LISTEN TO THIS RADIO STATION FOR A MINIMUM OF 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

RESPONDENTS CODING MORE THAN 1 RADIO STATION CAN CODE 1), 2) OR 3), AND BE LISTENING TO ANY AMOUNT OF HOURS AS LONG AS IT TOTALS OVER 5 HOURS PER WEEK, IF NOT PLEASE CLOSE

PLEASE AIM FOR A GOOD SPREAD OF RADIO STATIONS COVERED ACROSS THE GROUP

ASK ALL GROUPS

Q.8a Changing the subject to advertisements within the media now, can you please tell me which of the following statements you agree and disagree with?

- | | <u>AGREE</u> | <u>DISAGREE</u> |
|---|------------------|------------------|
| a) 'I dislike all forms of advertisements on the TV, Radio and newspapers' | [] CLOSE | [] |
| b) 'I do not mind different forms of advertisements on the TV, Radio and newspapers' | [] | [] CLOSE |
| c) 'I enjoy different forms of advertisements on the TV, Radio and newspapers' | [] | [] CLOSE |
| d) 'I always switch over radio stations when advertisements come on no matter where I am' | [] CLOSE | [] |

NO RESPONDENTS TO AGREE WITH STATEMENT A) & D) AND DISAGREE WITH STATEMENTS B) & C), IF SO PLEASE CLOSE

Q.8b Can you now please tell me which of the following statements you agree and disagree with regarding different forms of entertainment?

- | | <u>AGREE</u> | <u>DISAGREE</u> |
|---|--------------|------------------|
| a) 'I enjoy watching the TV & would class this as my favourite form of entertainment' | [] | [] |
| b) 'I really enjoy listening to the radio' | [] | [] CLOSE |
| c) 'I enjoy spending my time on the internet' | [] | [] |
| d) 'I enjoy spending time with my family/friends' | [] | [] |

NO RESPONDENTS TO DISAGREE WITH STATEMENT B) AND MUST NOT REJECT LISTENING TO THE RADIO, IF SO PLEASE CLOSE

**APPENDIX B:
DISCUSSION GUIDE**

MODERATORS' SESSION FLOW & TOPIC GUIDE

12.30	RESPONDENTS SIGN IN, RECEIVE NAME BADGES AND CODED STICKERS, COLD SNACKS AND DRINKS	
12.45-12.55	WELCOME AND INTRODUCTION (10 MINS)	PLENARY
	<ul style="list-style-type: none"> • Introduce Essential Research – explain role, MRS checklist (confidentiality, anonymity, bound by guidelines) • Here on behalf of Ofcom; introduce Ofcom representatives and inform that we will explain about what they do later on • Explain that we will be talking about commercial radio and looking at the various issues in very small detail; however emphasise it's important to consult with the public on these issues in order to help Ofcom make the right decisions in future on this subject • Format of the day (mix of presentations, table and all-in discussions, scheduled breaks) • Basic rules (no right/wrong answers, everyone to have a say) <ul style="list-style-type: none"> ○ however, we will need them to concentrate! • Housekeeping (mobile phones, drinks, toilets, fire exits) 	

12.55-13.25	TABLE DISCUSSION: COMMERCIAL RADIO GENERICS (30 MINS)	TABLES BY AGE GROUP
	<p>MODERATOR INTRODUCES SELF; REITERATES NO RIGHT/WRONG ANSWERS AND NEED FOR EVERYONE TO HAVE A SAY ALSO EMPHASISE WE ARE <u>NOT</u> FROM OFCOM / <u>NOT</u> EXPERTS</p> <p>RESPONDENTS PAIR UP AND INTRODUCE EACH OTHER, CAPTURING EACH OTHER'S FAVOURITE RADIO STATIONS AND WHY, AND FEED BACK TO THE TABLE</p> <p>MODERATOR IDENTIFY WHICH LISTENERS ARE MAINLY SPEECH VS. MAINLY MUSIC LISTENERS AND PROBE THROUGHOUT DAY ON ANY DIFFERENCES IN OPINION</p> <ul style="list-style-type: none"> • Table briefly discusses role of (all) radio in lives; likes/dislikes; values vs. other media • Focus on commercial radio: what do they think of when we say 'commercial radio'? What does this mean? How does it differ from BBC or Pirate radio? <p>CAPTURE MAIN WORDS / PHRASES ASSOCIATED WITH 'COMMERCIAL RADIO' ON FLIPCHART</p> <ul style="list-style-type: none"> • What do they like/dislike most about commercial radio (vs. BBC/Pirate radio)? <p>CAPTURE MAIN COMMERCIAL RADIO LIKES AND DISLIKES ON FLIPCHART</p> <ul style="list-style-type: none"> • Explore spontaneous awareness and understanding of commercial radio revenue sources and regulatory framework • Focus on 'commercial messages' on commercial radio: what are they? What do they think of them? Do they notice them/like/dislike them? • Are there different sorts of commercial messages on commercial radio BEYOND ad breaks? How would they describe them? <p>CAPTURE RESPONDENTS' CLASSIFICATIONS/WORDS/PHRASES ON FLIPCHART</p> <ul style="list-style-type: none"> • What do they feel about each of these types of commercial messages? <p>ENCOURAGE SPONTANEOUS DISCUSSION BUT DO NOT INTRODUCE OFFICIAL DEFINITIONS HERE</p>	<p>NOTE-TAKING + FLIPCHART CAPTURE</p>

<p>13.25-13.35</p>	<p>MODERATORS HAND OUT DEFINITION SHEETS.</p> <p>ESSENTIAL LEADER INTRODUCES LISTENING SESSION AND EXPLAINS THAT WE WILL NOW BE DEMONSTRATING THE 3 CORE TYPES OF COMMERCIAL MESSAGE OUTPUT USED IN COMMERCIAL RADIO AND REFERS RESPONDENTS TO THE 'DEFINITIONS' SHEET ON THEIR TABLES.</p> <p>EMPHASISE THAT THROUGHOUT THE DAY WE WILL BE HEARING EXAMPLES OF COMMERCIAL MESSAGES AND WE ARE INTERESTED IN RESPONDENTS' VIEWS ON THEM. SOME EXAMPLES MIGHT NOT BE TO THEIR TASTES OR MAY NOT FEEL PARTICULARLY WELL-DONE, BUT WE'LL NEED TO PUT THAT ASIDE FOR THE PURPOSES OF OUR DISCUSSION.</p> <p>ESSENTIAL LEADER PLAYS EACH CLIP ONCE AND READS OUT ITS CORRESPONDING DESCRIPTION.</p>	<p>PLENARY</p> <p>BLANK NOTEPADS</p>
<p>13.35-13.55</p>	<p>MODERATOR OPENS DISCUSSION ON TABLE (20 MINS)</p> <p>CHECK THAT RESPONDENTS UNDERSTAND DIFFERENCE BETWEEN PROGRAMMING, SPOT AD, SPONSOR CREDIT AND SPONSORED COMPETITION USING DEFINITIONS SHEET FOR REFERENCE.</p> <ul style="list-style-type: none"> • Is everyone aware of/familiar with each of these commercial message types? • Discuss each message type one by one, to remind respondents of each • How noticeable to them are these sort of messages in their general radio listening? <p>CAPTURE KEY WORDS AND PHRASES RESPONDENTS ASSOCIATE WITH EACH MESSAGE TYPE ON FLIPCHART</p> <p>MODERATOR CIRCULATES '<u>ATTITUDINAL QUESTIONNAIRE</u>' AND ASKS RESPONDENTS TO COMPLETE, EMPHASISING THAT THIS QUESTIONNAIRE AND THE REST OF THE DAY'S DISCUSSION WILL <i>FOCUS ON COMMERCIAL SPONSORSHIP AND <u>NOT</u> AD BREAKS.</i></p>	<p>TABLES BY AGE GROUP</p> <p>NOTE-TAKING + FLIPCHART CAPTURE</p>

<p>13.55-14.10</p>	<p>BREAK (15 MINS)</p>	
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14.10-14.20	PRESENTATION FOLLOWED BY Q+A (COMPREHENSION ONLY) ESSENTIAL/OFCOM (10 MINS)	PLENARY
14.20-14.40	TABLE DISCUSSION: RESPONSES TO PRESENTATION ESSENTIAL MODERATORS (20 MINS)	TABLES BY AGE GROUP
	<p>MODERATOR CIRCULATES PAPER HANDOUTS OF PRESENTATION FOR REFERENCE</p> <ul style="list-style-type: none"> • Check for any comprehension issues; refer to handouts of presentation where necessary • Assess awareness of funding and regulatory landscape • Probe: how important is it for commercial messages and sponsorship on commercial radio to be regulated? <p>CAPTURE REASONS FOR vs. AGAINST REGULATION ON FLIPCHART</p> <ul style="list-style-type: none"> • How far is this something they care about? <p>PROBE ALL RESPONDENTS ON TABLE FOR PERSONAL OPINION</p> <ul style="list-style-type: none"> • What do they think of the concept of consumer protection as discussed in the presentation? Why is this important? <p>MODERATOR EXPLAIN: WITHOUT TRANSPARENCY / SEPARATION / EDITORIAL PROTECTION THERE IS A RISK THAT LISTENERS MAY BE MISLED, SUFFER FINANCIAL DETRIMENT AND LOSE TRUST IN THE BROADCASTER. THIS IS EVEN MORE LIKELY IF A STATION HAS LOST EDITORIAL CONTROL OVER WHAT IT BROADCASTS FOR FINANCIAL GAIN.</p> <ul style="list-style-type: none"> • How important to them as listeners are Ofcom’s principles of Transparency, Separation and Editorial Independence? <p>CAPTURE ON FLIPCHART USING SCALE OF 1-10</p> <p>MODERATOR EXPLAIN THAT WE ARE HERE TODAY TO DISCUSS POSSIBLE CHANGES TO EXISTING REGULATION OF COMMERCIAL SPONSORSHIP</p> <ul style="list-style-type: none"> • How would they feel about changes being made to the existing regulatory framework? Which way would they want to see things go? Who would benefit from change? Why? 	NOTE-TAKING + FLIPCHART CAPTURE AT KEY POINTS IN DISCUSSION

14.40-15.00	<p>CLIP #1: COMMERCIAL REFERENCE ([Song Download])</p> <p>PLAY CLIP TWICE TO WHOLE ROOM. AFTER 2ND HEARING RESPONDENTS MARK THEIR RESPONSES ON '<u>QUESTIONNAIRE #1</u>'</p> <p>RESPONDENTS KEEP THEIR QUESTIONNAIRES FOR REFERENCE</p>	<p>PLENARY</p> <p>PAPER Q'AIRE CAPTURE</p>
	<p>MODERATOR ALLOW FIVE MINUTES AT END OF SESSION TO CAPTURE MAIN THEMES / BASIC HAND-SHOWS</p> <ul style="list-style-type: none"> • <u>Briefly</u> discuss response to the clip they have just heard: respondents use their individual questionnaires as a reference <p>REVEAL: <i>'Under current rules, this type of promotion is not allowed because there is no adequate separation between the programme content (i.e. the [artist] song being played) and the promotion of the [Song Download]. In other words, the [Song Download] was not featured in an ad break.'</i></p> <ul style="list-style-type: none"> • How do respondents feel about this new information; has this changed their views and why • What do they think of the suggestion that they could download the track straight after hearing it? Why? • How far is it a concern to them that the promotion occurred in the middle of the programming and NOT in an ad break? • Would they feel differently if the promotion was made by the show's presenter, rather than broadcast as a recorded drop-in? Why? 	<p>TABLES BY AGE GROUP</p>

MODERATOR EXPLAIN:

In future the rules may or may not change, and we'd like to know what you think about the following four possible future scenarios for this type of promotion:

- 1) Current rules apply i.e. this kind of promotion remains an infringement of Ofcom rules

OR

- 2) As long as a promotion is *directly relevant* to the programming you've just heard, it is considered acceptable by Ofcom (e.g. the [Song Download] example you just heard)

OR

- 3) Promotions which are *not* relevant to the programming you've just heard, but which the radio station feels are relevant to its listeners more generally are considered acceptable by Ofcom (e.g. promotion of a third party's CD that reflects the music more generally heard on the station)

OR

- 4) Commercial promotions which are not necessarily related to any content broadcast on the station are considered acceptable by Ofcom (e.g. a local business / service)

5 MIN FLIPCHART SUMMARY CAPTURE:

- **GENERAL KEY THEMES**
- **SHOW OF HANDS - RESPONSE TO FUTURE SCENARIOS ABOVE**

<p>15.00-15.30</p>	<p>CLIP #2: SPONSORED COMPETITION ([BOND DVD]/[DEPARTMENT STORE]) (30 MINS)</p> <p>PLAY [BOND DVD] CLIP ONLY, TWICE TO WHOLE ROOM. AFTER 2ND HEARING RESPONDENTS MARK THEIR RESPONSES ON <u>QUESTIONNAIRE #2A</u></p> <p>RESPONDENTS KEEP THEIR QUESTIONNAIRES FOR REFERENCE</p>	<p>PLENARY</p> <p>PAPER Q'AIRE CAPTURE</p>
	<p>MODERATOR ALLOW FIVE MINUTES AT END OF SESSION TO CAPTURE MAIN THEMES / BASIC HAND-SHOWS</p> <ul style="list-style-type: none"> • Briefly discuss clip they have just heard, using individual questionnaires as a reference <ul style="list-style-type: none"> ○ sponsored or not; if so by whom; how could they tell <p>REVEAL: <i>The competition was sponsored i.e. paid for by the Bond DVD. Under the current rules, references to the sponsor can only be in sponsor credits (SEE DEFINITION SHEET) and the sponsor may not feature in the competition question or content itself.</i></p> <ul style="list-style-type: none"> • As a radio listener, how did you feel about the sponsor's product being featured within the sponsored competition? How far is this an issue for you and why? 	<p>TABLES BY AGE GROUP</p>

	<p>ESSENTIAL LEADER PLAYS <u>[DEPARTMENT STORE] CLIP ONLY</u>, TWICE TO WHOLE ROOM</p> <p>AFTER 2ND HEARING RESPONDENTS MARK THEIR RESPONSES ON <u>QUESTIONNAIRE #2B</u></p> <p>RESPONDENTS KEEP THEIR QUESTIONNAIRES FOR REFERENCE</p>	<p>PLENARY</p> <p>PAPER Q'AIRE CAPTURE</p>
	<ul style="list-style-type: none"> • <u>Briefly</u> discuss clip they have just heard, using individual questionnaires as a reference <ul style="list-style-type: none"> ○ sponsored or not; if so by whom; how could they tell <p>REVEAL: <i>The competition was sponsored i.e. paid for by [the department store]. Under the current rules, references to the sponsor can only be in sponsor credits (SEE DEFINITION SHEET) and the sponsor may not feature in the competition question or content itself.</i></p> <ul style="list-style-type: none"> • Thinking about both clips in this section, did you feel either was more heavily promotional of the sponsor than the other; which and why? • How far does it matter if you have sponsor references within a competition; why? • Should sponsors be able to promote themselves in this way? 	<p>TABLES BY AGE GROUP</p>

	<p>MODERATOR EXPLAIN: <i>In future the rules may or may not change, and we'd like to know what you think about the following three possible future scenarios for this type of promotion:</i></p> <p>1) Do not allow references to sponsors within competitions (current)</p> <p>OR</p> <p>2) Allow references to the sponsor as a feature of the competition question/content (as per [Bond DVD])</p> <p>OR</p> <p>3) Allow highly promotional references (i.e. prices etc.) to the sponsor as a feature of the competition question/content (as per [Department Store])</p> <p>MODERATOR EXPLORE</p> <p><u>5 MIN FLIPCHART SUMMARY CAPTURE:</u></p> <ul style="list-style-type: none"> • GENERAL KEY THEMES • SHOW OF HANDS - RESPONSE TO FUTURE SCENARIOS ABOVE 	
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15.30-15.45	BREAK	
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15.45-16.15	<p>CLIP #3: SPONSOR REFERENCES ([TRAVEL AGENCY]) (30 MINS)</p> <p>PLAYS <u>[TRAVEL AGENCY] CLIP TWICE TO WHOLE ROOM</u></p> <p>AFTER 2ND HEARING RESPONDENTS MARK THEIR RESPONSES ON <u>QUESTIONNAIRE #3</u></p> <p>RESPONDENTS KEEP THEIR QUESTIONNAIRES FOR REFERENCE</p>	<p>PLENARY</p> <p>PAPER Q'AIRE CAPTURE</p>
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	<p>MODERATOR ALLOW FIVE MINUTES AT END OF SESSION TO CAPTURE MAIN THEMES / BASIC HAND-SHOWS</p> <ul style="list-style-type: none"> • <u>Briefly</u> discuss clip they have just heard, using individual questionnaires as a reference <p>REVEAL: <i>In this clip, the travel agent paid to be featured on the station in this way as part of a weekly feature. This is currently not allowed for two reasons:</i></p> <ul style="list-style-type: none"> - <i>it was not transparent that the programming was sponsored</i> - <i>you cannot promote a sponsor within programming</i> <p>MODERATOR EXPLAIN WE ARE NOW FOCUSING ON THE <u>FIRST</u> OF THESE TWO ISSUES I.E. LACK OF TRANSPARENCY RE. SPONSORSHIP</p> <ul style="list-style-type: none"> • How obvious was it that this was a paid-for feature <ul style="list-style-type: none"> ○ If yes: What made you aware that it was paid-for? ○ If no: Does knowing it was paid-for make you feel you were misled? • Do you think this kind of promotion should be allowed in programming? • Would you feel differently if it had been made clear that the feature had been paid-for (for example, by a sponsor credit)? • What do they feel about the lack of transparency in this example; why <p><u>5 MIN FLIPCHART SUMMARY CAPTURE:</u></p> <ul style="list-style-type: none"> • GENERAL KEY THEMES • OBVIOUSLY A PAID-FOR FEATURE YES / NO • SHOW OF HANDS: WOULD THEY FEEL DIFFERENTLY IF IT HAD BEEN MADE CLEAR THAT THE FEATURE HAD BEEN PAID FOR 	<p>TABLES BY AGE GROUP</p>
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<p>16.15-16.45</p>	<p>CLIP #4: SPONSORED OUTSIDE BROADCAST ([ST PATRICK'S DAY] / [THEME PARK]) (30 MINS)</p> <p>READ: <i>The two final clips you're going to hear are of 'outside broadcasts' – special features that are broadcast from venues or locations.</i></p> <p><i>An example of a local radio outside broadcast might be at an event like the opening of a local superstore. But producing outside broadcasts is expensive because of the costs involved to transport the production to the location. Broadcasters would like to offer the outside broadcast venue the chance to sponsor the programming.</i></p> <p><i>But currently, venues are not allowed to sponsor the outside broadcasts that come from them, as the radio station would then be giving more than a passing reference to the sponsor in programming.</i></p> <p><i>The two clips you're going to hear are just the opening few minutes of programmes that could last for a few hours each. So when you listen to them, bear in mind that the references to the sponsor – that is, the venue – are likely to occur throughout the broadcast, as it is featured or explored.</i></p> <p>PLAY [ST PATRICK'S DAY] TWICE TO WHOLE ROOM AFTER 2ND HEARING RESPONDENTS MARK THEIR RESPONSES ON <u>QUESTIONNAIRE #4A</u></p> <p>PLAY [THEME PARK] TWICE TO WHOLE ROOM AFTER 2ND HEARING RESPONDENTS MARK THEIR RESPONSES ON <u>QUESTIONNAIRE #4B</u></p> <p>RESPONDENTS KEEP THEIR QUESTIONNAIRES FOR REFERENCE</p>	<p>PLENARY</p> <p>PAPER Q'AIRE CAPTURE</p>
	<p>MODERATOR ALLOW FIVE MINUTES AT END OF SESSION TO CAPTURE MAIN THEMES / BASIC HAND-SHOWS</p> <ul style="list-style-type: none"> • <u>Briefly</u> discuss clips they have just heard, using individual questionnaires as a reference <ul style="list-style-type: none"> ○ what differences did they notice between the two clips in terms of the levels of sponsorship? ○ what would they expect to hear in the rest of the programmes? 	<p>TABLES BY AGE GROUP</p>

MODERATOR CLARIFY:

As indicated earlier, neither of these are currently permitted because references to sponsors or their products or services (whether promotional or non-promotional) are not allowed within outside broadcast programming. In other words, such references must only be in the sponsor credits and may not feature significantly in the outside broadcast itself. However the very nature of an outside broadcast is that it generally features or explores the venue.

- Should venues be allowed to sponsor outside broadcasts that come from them; why / why not
- Should sponsors be allowed to pay for their products / services to be endorsed by a presenter; why
- What did they think about the presenter in the [Theme Park] clip endorsing the sponsor’s venue / services; why
- Should sponsors be allowed to pay for their products and services to be promoted by presenters in outside broadcasts

MODERATOR EXPLAIN:

In future the rules may or may not change, and we’d like to know what you think about the following four possible future scenarios for outside broadcasts, with the first option representing no change, and the last option representing the greatest change to the current rules:

- 1) Current rules remain unchanged (i.e. outside broadcasts cannot be sponsored by the venue)
- 2) Factual references to the sponsor and its products or services are permitted (e.g. as you heard in the [St Patrick’s Day] clip)
- 3) Factual and promotional references to the sponsor and its products and services are permitted (e.g. [Theme Park])
- 4) Factual and highly promotional references to the sponsor and its products or services are permitted (e.g. at the opening of a local superstore, prices and benefits of products are prominently featured)

5 MIN FLIPCHART SUMMARY CAPTURE:

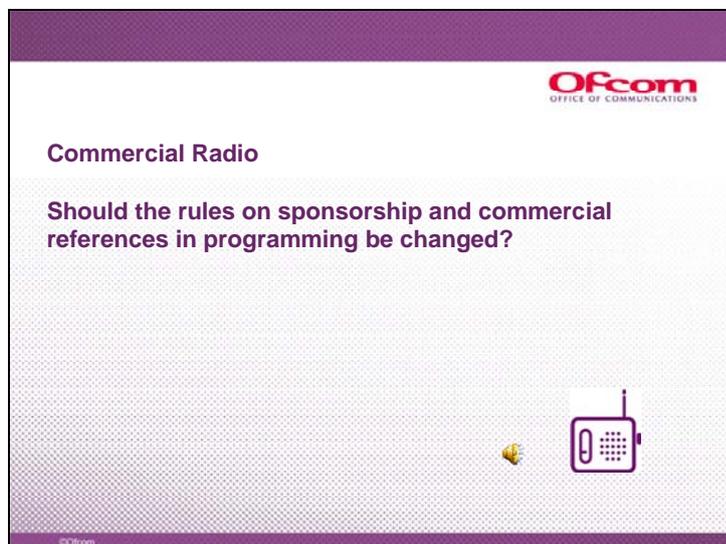
- **GENERAL KEY THEMES**
- **SHOW OF HANDS – RESPONSE TO FUTURE SCENARIOS (ABOVE)**

16.45	<p>MODERATOR ASK RESPONDENTS TO RETURN TO THEIR ORIGINAL GENERAL ATTITUDES SHEET AND FILL OUT THE SECOND COLUMN. EXPLAIN THAT THIS IS TO SEE WHETHER THEIR FEELINGS ON ANY OF THESE ISSUES HAVE CHANGED OVER THE COURSE OF THE DISCUSSION.</p> <p>EMPHASIES THAT THEY MAY NOT HAVE CHANGED AT ALL, AND IF SO THIS IS FINE!</p> <p>(ALLOW 5 MINS)</p>	
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16.50 - 17.00	<p>EACH TABLE FEEDS BACK THEIR FINAL VERDICT ON HOW FAR RULES SHOULD BE RELAXED WITH REGARD TO THE 4 CATEGORIES INVESTIGATED</p> <p>FINAL Q + A'S FOR OFCOM</p> <p>THANK, CLOSE, RESPONDENTS SIGN OUT</p>	PLENARY
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APPENDIX C: THE OFCOM PRESENTATION

Following are the slides from the PowerPoint presentation delivered to all respondents as part of this research. The slides were accompanied by a pre-recorded script, read by an Ofcom representative.



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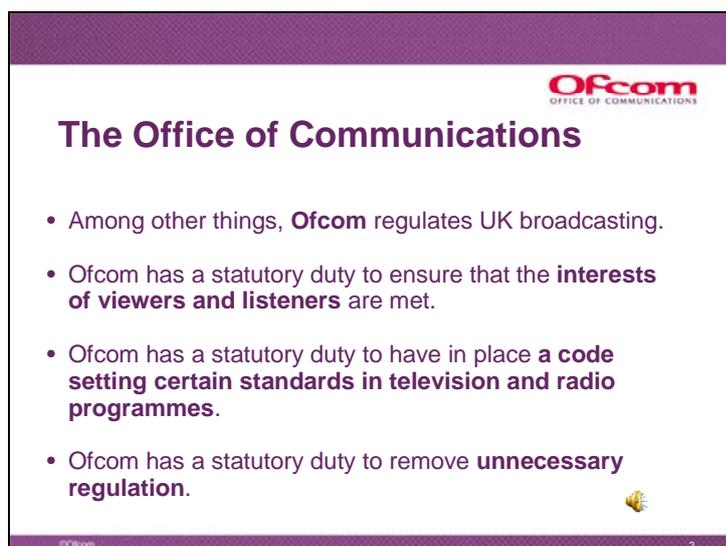
Commercial Radio

Should the rules on sponsorship and commercial references in programming be changed?



©Ofcom

This slide features a purple header with the Ofcom logo. The main content is on a white background with a light purple dot pattern. It includes the title 'Commercial Radio' and a question about sponsorship and commercial references. There are two small icons: a speaker and a mobile phone.



Ofcom
OFFICE OF COMMUNICATIONS

The Office of Communications

- Among other things, **Ofcom** regulates UK broadcasting.
- Ofcom has a statutory duty to ensure that the **interests of viewers and listeners** are met.
- Ofcom has a statutory duty to have in place a **code setting certain standards in television and radio programmes**.
- Ofcom has a statutory duty to remove **unnecessary regulation**.



©Ofcom 2

This slide features a purple header with the Ofcom logo. The main content is on a white background with a light purple dot pattern. It includes the title 'The Office of Communications' and a bulleted list of four points about Ofcom's duties. There is a small speaker icon at the bottom right.

Radio advertising and sponsorship – why does it matter?

- Commercial revenue pays for programmes and other broadcasting costs.
- Radio advertising and sponsorship is the 'price' listeners pay for free commercial radio.
- Commercial revenue affects the programming we hear.



Radio allows advertisers to connect with specific audiences

- Different stations attract different listeners.
- Different stations broadcast nationally, regionally and locally.



Ofcom does not undertake the day-to-day regulation of radio advertisements

Areas of interest today:

Sponsorship and

Commercial References within programming



Key principles

Transparency

Separation

Editorial Independence



Reasons for Ofcom's Review

- Ofcom is currently reviewing its Broadcasting Code.
- The purpose is to assess whether the Code remains fit for purpose.
- There have been big changes in the radio environment.



The changing radio environment

- The media, communications and entertainment industries are changing fast.
- In the radio market there are many more analogue and digital radio services.
- Listener choice is increasing.



What does this mean for commercial radio?

- Fewer listeners to individual stations.
- Less money from advertising.
- More expense: investment in new technologies is increasing costs.
- Stations are struggling to survive.



What does this mean for listeners?

- Range of radio programming and services could be threatened.
- Certain types of programme are unaffordable.
- Some stations might disappear.



Radio sponsorship is growing

- Commercial radio revenue from advertising is declining.
- Only sponsorship is growing.
- As a proportion of radio revenue it has grown by 25% since 2004.
- Commercial radio is looking for ways to increase revenue and would like to develop sponsorship further.



Consumer protection issues

Ofcom considers whether the material a commercial radio station may broadcast is likely to:

- mislead its listeners;
- cause its listeners harm or offence;
- lead to a breach of trust with its listeners.



Should Ofcom's rules on sponsorship and commercial references in programming be changed?



APPENDIX D: RADIO TERMINOLOGY SHEET

This sheet was given to respondents as an accompaniment to an audio clip which was played in the sessions. This clip contained three examples of radio promotions. The objective of providing this information was to ensure all respondents were clear about the various types of promotion and terminology which would be referred to throughout the session.

Radio Terms

The clips you will listen to now represent the following types of commercial promotion:

1) Sponsor Credit ([station] / [sponsor])

Sometimes referred to as a 'sponsorship credit', this is a brief branding statement that lets the listener know a sponsor has a commercial association with specific programming (i.e. a specific show or a specific feature). A sponsor credit may include a phrase such as "brought to you by....." or "in association with..." to identify the sponsorship arrangement.

2) Spot Advertisement ([station])

Sometimes referred to as a 'commercial' or 'spot ad', this is an advertisement found in an advertising break.

3) Sponsored Competition ([station])

Sometimes referred to as a 'radio promotion' (by the radio industry), this is an example of a sponsored feature. Generally, the sponsor not only pays to be associated with the competition but also donates the prize(s) on offer.

In addition:

Programming:

Sometimes referred to as 'editorial', programming is all radio output apart from advertisements. It comprises programmes (e.g. a Breakfast Show), music, and features (e.g. weather).

APPENDIX E: DEFINITIONS OF REGULATORY PRINCIPLES

These were provided to respondents in order that they could refer to them as a reminder throughout the session.

Regulatory Principles

Transparency:

Any commercial association with programming (generally sponsorship) should be made clear to listeners (e.g. in the case of sponsorship, transparency is achieved by the inclusion of sponsor credits).

Separation:

Advertising should be kept separate and distinct from programming. To this end, sponsor credits should also be clearly identifiable as such around (and sometimes within) programming.

Editorial Independence:

To ensure that programming is not distorted for commercial purposes. To this end, the broadcaster must maintain editorial control over all programming (i.e. including sponsored programming).

APPENDIX F: DATA TABLES

Please note, the following tables are based on an overall score across all regions and age groups i.e. a total of 156 respondents. While this is a sufficiently robust figure from which to draw conclusions about the results, it should be remembered that this data was gathered as part of a qualitative process and is intended primarily to deliver an overall sense of the balance of opinion across groups. In other words, while the data is valid from a quantitative point of view, it should be regarded as *indicative* of the weight of feeling towards certain scenarios.

TABLE ONE: SUMMARY OF LEVELS OF CONCERN RELATING TO EACH EXAMPLE

The following table illustrates the degree to which respondents indicated their individual, spontaneous concern over the examples they listened to.

1 = not at all bothered; 5 = extremely bothered

Bothered' scale: mean scores	
Song download	1.6
Bond	1.8
Department store	2.7
Travel agency	3.2
St Patrick's Day	1.5
Theme Park	2.6

NB: Base size 156 – treat as indicative only

TABLE TWO: SCENARIO TOLERANCE SPECTRUM BY AGE

	Song download	Bond / department store	St Patrick's day / theme park
18-24yrs	1 – 2 2 – 28 3 – 7 4 – 3	1 – 1 2 – 20 3 – 19	1 – 0 2 – 21 3 – 12 4 – 7
25-34yrs	1 – 12 2 – 19 3 – 5 4 – 1	1 – 9 2 – 25 3 – 3	1 – 0 2 – 33 3 – 3 4 – 1
35-44yrs	1 – 10 2 – 22 3 – 9 4 – 0	1 – 7 2 – 19 3 – 15	1 – 2 2 – 19 3 – 14 4 – 6
45-60yrs	1 – 11 2 – 18 3 – 1 4 – 8	1 – 1 2 – 17 3 – 20	1 – 0 2 – 21 3 – 6 4 – 11
TOTAL	1 – 35 2 – 87 3 – 22 4 – 12	1 – 18 2 – 81 3 – 57	1 – 2 2 – 94 3 – 35 4 – 25

NB: Base size 156 – treat as indicative only

TABLE THREE: SUMMARY OF OVERALL RESPONSE TO STIMULUS

The following table shows a summary of listener response to the range of stimulus clips played during the research sessions. These evaluations were developed at the analysis stage and not during the research sessions. They are based on the four criteria which we identified as mattering most to commercial radio listeners. The traffic light system indicates how far each clip was felt to meet each the four criteria.

	Song download	Bond	Department store	Travel agency	St Patrick's Day	Theme Park
It's relevant to the listening context						
It doesn't intrude on listening experience						
It's clear that this is commercial in nature						
It doesn't threaten listener trust						