

Consultation response form

Your response

About Gaydio and our interest in this review

Gaydio is the UK's national LGBTQ+ radio station, operating across DAB, online platforms and smart speakers. We exist to serve audiences who are often underrepresented by mainstream media and to provide content that reflects the diversity of the UK's LGBTQ+ communities.

Digital distribution, including DAB, is central to our ability to reach audiences at scale. Gaydio currently broadcasts on a combination of city-wide commercial DAB multiplexes (specifically London) and multiple small scale DAB multiplexes. This gives us direct operational experience of how different multiplex models function in practice, and how regulatory and market structures affect services of different sizes, ownership models and stages of growth.

We welcome Ofcom's review of broadcast regulation and its stated objective of ensuring that licensing and regulatory frameworks remain proportionate, future-proof and supportive of innovation in a digital environment. Our response focuses on digital radio, and in particular the licensing, ownership and operation of DAB multiplexes.

DAB market consolidation and structural imbalance

The DAB distribution market in the UK is now highly consolidated. A small number of large organisations control a significant proportion of multiplex capacity and transmission infrastructure, both nationally and locally. In many cases, these multiplexes are operated as for-profit businesses by organisations that also own and operate extensive portfolios of radio services.

This consolidation creates a structural imbalance in the market. Where multiplex operators also have substantial interests as radio service providers, decisions around capacity allocation, pricing, technical upgrades and service prioritisation are not neutral. There is an inherent incentive to favour affiliated services, whether directly or indirectly, and to structure pricing and access in ways that disadvantage independent services and new entrants.

For smaller broadcasters, specialist services and community-focused stations, this significantly raises barriers to entry and expansion. Access to DAB capacity is often expensive, inflexible, or unavailable on terms that allow sustainable growth.

Financial incentives and the extraction of surplus

Where multiplexes are operated on a for-profit basis, surpluses generated through carriage fees ultimately flow back to their owners. In cases where those owners are also major radio groups, this has the effect of offsetting their own transmission costs while independent services continue to pay market rates.

This dynamic reinforces incumbent advantage. Large radio groups benefit twice, once through their ability to influence or control multiplex economics, and again through reduced effective transmission costs for their own services. Independent broadcasters do not share in these efficiencies and are instead exposed to rising or inflexible costs.

This is not simply a commercial issue. It has implications for plurality, diversity of ownership, and the availability of specialist or minority-focused services on digital radio.

DAB+ transition and access to newly created capacity

We recognise that progress is now being made towards the adoption of DAB+. The transition to more efficient transmission standards has the potential to free up additional capacity and support innovation in the sector.

However, there is currently no clear assurance that this newly created capacity will be made available on fair, transparent and non-discriminatory terms to independent services and new entrants. Without regulatory oversight or stronger licensing expectations, there is a risk that the benefits of DAB+ will primarily accrue to existing multiplex owners and their affiliated services.

From a public interest perspective, Ofcom should consider whether the current licensing framework provides sufficient levers to ensure that technical efficiency gains translate into improved market access, increased diversity of services and greater listener choice.

Potential regulatory and licensing approaches

We encourage Ofcom to consider whether changes to licensing and regulatory expectations could help address these structural issues. Potential approaches could include:

- Introducing clearer expectations or requirements that a defined proportion of multiplex capacity is made available to third-party services on transparent, published and proportionate terms.
- Considering whether some capacity should be reserved or prioritised for genuinely independent services, with safeguards to ensure this achieves the intended market outcomes.
- Reviewing whether current licensing arrangements allow beneficiary owners to exercise excessive control over capacity allocation and access decisions, and whether alternative models would better support competition and innovation.
- Strengthening transparency requirements around DAB+ transition planning, including how additional capacity will be allocated and the criteria used.

We are not proposing a single prescriptive solution, but we believe the current framework does not consistently deliver the outcomes Ofcom seeks around competition, innovation and plurality.

A not-for-profit model as a possible alternative

A more radical option Ofcom may wish to explore is whether some DAB multiplexes, particularly at local or regional level, could operate on a not-for-profit basis.

Under such a model, the genuine costs of running the multiplex would be shared between participating service providers. As new services join, economies of scale would reduce costs for all participants, rather than generating surplus for a small number of owners. This would better align incentives with market entry, innovation and long-term sustainability.

We recognise that this would represent a significant shift from current practice, but believe it is worth exploring as part of a broader review of whether existing licensing models continue to serve the public interest in a digital broadcasting environment.

Small scale DAB, value for money and service quality

Small scale DAB has been an important entry point for many services and often offers significantly better value than commercial multiplexes for comparable local reach. Gaydio's experience of small scale DAB has demonstrated its potential to support innovation and local diversity.

However, listener experience on small scale DAB is inconsistent. In practice, service quality can vary significantly between multiplexes, and some deliver a noticeably poorer technical experience for listeners. While we recognise the financial constraints under which small scale operators operate, inconsistent quality risks undermining confidence in digital radio as a whole.

Ofcom may wish to consider whether clearer minimum expectations, guidance or best-practice standards are needed, while remaining proportionate to the scale and resources of small scale operators.

Coverage boundaries, service switching and listener experience

Services seeking wider reach often broadcast on neighbouring small scale multiplexes. In these cases, the real-world listener experience of moving between multiplexes is mixed.

In some boundary areas, radios repeatedly switch between versions of the same service. In other cases, listeners report that radios are slow to switch or fail to switch at all. This can lead to confusion, frustration and a perception of poor service reliability.

These issues suggest that current coverage planning, licensing metrics and regulatory measures do not always translate into good outcomes for listeners. In particular, it raises questions about whether percentage coverage requirements for local multiplexes are the most effective way of measuring success.

A regulatory target may be met on paper, while the lived listener experience remains fragmented.

Willingness to engage

We would welcome the opportunity to discuss these issues further with Ofcom and to provide practical examples based on operational experience and listener feedback. We believe these matters go directly to the objectives of this review and to the future sustainability, innovation and diversity of digital radio in the UK.
