RADIOCENTRE SUBMISSION TO OFCOM CALL FOR INPUT: REVIEW OF BROADCAST REGULATION

OVERVIEW

1. Radiocentre welcomes the opportunity to respond to Ofcom's call for input[1] on its review of broadcast regulation. We agree with Ofcom that "*regulation must be proportionate, consistent and targeted only where it is needed*" and that it is timely to review how Ofcom can "*set regulation to encourage growth and innovation*"[2].

2. Ofcom and the commercial radio industry have recently been through a deregulatory process under the Media Act 2024, which removed a number of outdated requirements (including formats and local production requirements), while safeguarding the provision of local news and information on analogue commercial radio licences.

3. As a result, our response to this consultation focuses less on immediate regulatory burdens within the existing regulatory framework for commercial radio and more on the strategic questions that Ofcom raises about long-term licensing reform, including what regulatory framework will be needed to support the ongoing sustainability of UK Public Service Media (PSM) content – including commercial radio and audio – within a wholly digital environment.

4. The key points we wish to highlight are:

    - **Commercial radio is a core part of the wider PSM ecosystem**, including through the provision of trusted news and information, the value it delivers to listeners and the contribution it makes to the UK economy and creative industries.

    - **As listening shifts online, access to audiences is increasingly mediated by digital gatekeepers**. In this context, prominence and discoverability will become central to whether UK PSM content (including radio and audio) is easy to find and access as media consumption shifts to third-party platforms and algorithmically curated environments.

    - **The Media Act sets an important precedent for establishing regulatory safeguards to support the delivery of PSM content online**. Part 6 of the Media Act guarantees access to Ofcom-licenced UK radio services on voice-activated platforms, in recognition of the significant public value provided by broadcasters. However, the audio market is moving beyond linear broadcast radio towards a diversity of IP-only services, on-demand audio and, increasingly, podcasts that feature video content.

    - **Looking ahead, the broadcast licensing framework will need to evolve**. It is therefore important that Ofcom and government consider how a future regulatory exchange could work, including whether prominence/discoverability protections for

[1] Ofcom, Call for input: Review of Broadcast Regulation, November 2025
[2] Ofcom, Transmission Critical, p. 64

UK audio on major online platforms (that act as gateways to audiences) should be part of that settlement.

5. We welcome continued engagement with Ofcom as it develops its roadmap following this review, including to ensure that the important public value delivered by commercial radio broadcasters is reflected in future work on the PSM ecosystem and the future of distribution.

COMMERCIAL RADIO DELIVERS PUBLIC VALUE

6. Radio in the UK remains an important and powerful medium. Listeners are well served by a diverse mix of national, regional and local broadcasters, from commercial radio and the BBC, with 9 out of 10 of the adult population tuning in every week[2].

7. Commercial radio alone has 40 million listeners[3] and is one of the UK's largest providers of news and information, broadcasting over 10,000 news bulletins weekly[4]. The sector is also a significant contributor to the creative economy. Commercial radio is estimated to provide £683 million GVA to the UK economy, as well as supporting 12,340 jobs.

8. Broadcasters provide listeners with a broad mix of music, entertainment, trusted news and information, and companionship. It is this diverse content proposition that underscores commercial radio's unique public value contribution. Radio stands out as a crucial source of human connection and shared experience for audiences as media consumption becomes increasingly online, atomised and fragmented.

9. Radiocentre's recent report, *Commercial radio: A force for good*[5], outlines the industry's overall positive social, cultural and economic impact. It showcases how commercial radio broadcasters deliver public value across five key areas:

    - **Companionship** – The value provided directly to audiences through entertainment, engagement and accessibility.
    - **Economic impact** – Commercial radio's direct and indirect contribution to the UK economy and creative industries, including gross value added, employment and investment in skills and training.
    - **Advertisers** – The effectiveness and return on investment that stations deliver to advertisers, along with their role as a trusted and regulated space to safeguard brand safety.
    - **News** – Commercial radio's contribution to informing the public through the provision of trusted news and information.
    - **Charity** – The role of broadcasters in supporting charities and raising awareness of good causes.

[2] RAJAR, Q3 2025
[3] Ibid
[4] Radiocentre, Commercial radio: A force for good, 2025
[5] Radiocentre, Commercial radio: A force for good, 2025

10. Commercial radio is therefore an important part of the UK's PSM ecosystem, as recognised by Ofcom in the *Transmission Critical* report[6]. It has a unique ability to reach audiences and delivers significant value to audiences, advertisers and the economy. The government recognises the public value provided by commercial radio and the importance of supporting the sector, alongside growth across the wider economy.

CHANGING AUDIENCE HABITS

11. In the *Transmission Critical* report, Ofcom notes that audiences are increasingly consuming content via online intermediaries and third-party platforms, and that securing the future of PSM content will require changes across the wider media ecosystem, including actions by platforms, government and regulators.

12. Although a large focus of the report is on television and the Public Service Broadcasters (PSBs), Ofcom's report also explicitly recognises the contribution of the commercial radio industry to news and speech programming and the delivery of PSM content.

13. Connected devices are transforming listening habits and the platforms audiences use to listen to radio and audio services. Online listening to live radio now accounts for a third (33%) of all commercial radio listening – with smart speakers alone accounting for 22%[7]. This is a higher proportion than for radio overall or BBC radio, which has not seen listening migrate online at the same rate. Meanwhile, according to Ofcom's own research, almost a quarter of adults (24%) listen to podcasts each week[8], with Spotify being the most commonly used podcast platform, followed by BBC Sounds and YouTube[9].

14. Furthermore, video-sharing platforms play an increasingly significant role in audio listening, with YouTube identified by Ofcom as the most listened-to online audio service[10]. Ofcom also highlights that audiences are using YouTube for music and podcasts, and that nearly 30% of people who consume podcasts prefer to do so with video[11] – a trend which highlights the convergence of audio and video consumption/discovery.

15. Looking ahead, these trends signify that issues around prominence and discoverability on third-party platforms like YouTube will become more central to media policy and regulation. As audiences turn to online platforms for an increasing share of their media consumption, it becomes harder to ensure that PSM content (including commercial radio/audio) is visible and easy to find.

16. Ofcom is therefore right to identify[12] a case for government to review extending a prominence regime for UK PSM providers on third-party platforms, like YouTube, that play an increasing role in connecting audiences with news and other content.

[6] Ofcom, Transmission Critical, p. 4
[7] RAJAR, Q3 2025
[8] RAJAR, MIDAS Summer 2025
[9] Ofcom, Audio Listening in the UK 2025, p. 17
[10] Ofcom, Audio Listening in the UK 2025, p. 6
[11] Ofcom, Transmission Critical, p. 18
[12] Ofcom, Transmission Critical, p.46

THE MEDIA ACT (PART 6)

17. Part 6 of the Media Act introduces important safeguards for the future of UK radio on voice-activated devices like smart speakers. It guarantees access to UK radio services on voice assistant platforms (such as Amazon Alexa, Google Assistant and Apple Siri), including voice-activated systems in connected cars. This is vital, as online listening to radio continues to grow, the majority of which takes place on smart speakers.

18. This sets a helpful precedent – it recognises that, where radio services deliver public value, it is proportionate for policy intervention to ensure that those services remain available and easy to access on platforms that account for a significant share of radio listening.

19. Nevertheless, these regulatory protections will only apply to simulcasts of Ofcom-regulated broadcast radio services that are requested by voice. As listening habits shift, it is becoming clear that UK audio is expanding beyond linear broadcast radio, with consumption diversifying across:

    - IP-only radio stations
    - On-demand audio (including podcasts), and
    - Podcasts with a video component, including on major video-sharing platforms like YouTube.

20. We would encourage Ofcom to consider how the regulatory framework set out in the Media Act can remain futureproof as these trends develop. In particular, the safeguards around access and discoverability will likely need to be broadened beyond voice requests of IP-simulcasts, as audiences increasingly discover and consume UK audio across multiple interfaces, platforms and formats.

LONG-TERM LICENSING REFORM

21. Ofcom rightly notes that "*in the longer term the licensing framework is likely to need fundamental reform, so that it reflects a wholly digital environment*"[13].

22. Historically the regulatory exchange has seen licensed commercial radio broadcasters benefit from access to spectrum (and more recently voice assistant platform safeguards via the Media Act), in return, among other things, for delivering public value content and meeting certain licence conditions.

23. As audio consumption and distribution continues to shift online, audiences will increasingly access radio and audio services via a number of digital gateways (voice assistants, connected cars, mobile operating systems, aggregators and video/audio platforms). Ofcom's analysis shows that these shifts are already well underway – with smart speakers accounting for a substantial share of listening and YouTube increasing its position as a major audio and podcast platform.

[13] Ofcom, Call for input: Review of broadcast regulation, p. 2

24. We therefore welcome Ofcom exploring what a future licensing and regulatory framework should look like, including:

- how the continued provision of UK PSM audio can be supported in a context where discovery and access are increasingly mediated by third-party platforms and algorithms; and
- whether a new form of regulatory framework is required in which qualifying UK PSM audio services benefit from prominence/discoverability on significant online platforms, in recognition of the public value they deliver.

25. The nature of any policy and regulatory intervention will likely be dependent on the outcome of several concurrent and related workstreams, including:

- the future of television distribution, and the related impact of any decision for radio, given the shared broadcast infrastructure;
- the BBC Charter Review, which will set out the role and remit of the BBC for the next decade; and
- the forthcoming Digital Radio & Audio Review, which will assess future scenarios for the consumption and distribution of UK radio and audio content.

26. The *Transmission Critical* report highlights the need for action predominantly in relation to PSBs. However, we urge Ofcom to consider the wider PSM ecosystem, which includes commercial radio/audio, as it develops any proposals in relation to the discoverability of PSM content on significant online platforms.

27. We welcome continued engagement with Ofcom on the long-term questions raised in its call for input about the future licensing framework and would be happy to participate in further discussions as Ofcom develops its approach.

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