

Your response

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Question 1: Do you agree with the proposed broadcast licensing priorities for the short to medium term? Please give reasons for your answer.	Confidential? – Y / N We broadly agree with Ofcom’s proposed broadcast licensing priorities for the short to medium term, particularly in light of the completion of the Small-Scale DAB (SSDAB) licensing programme and the need to consolidate and support the evolving digital radio landscape. The focus on prioritising resources and streamlining licensing activity is sensible given the maturity of the current rollout phase. However, we believe there are several important considerations that should be strengthened to ensure the approach fully supports community broadcasters and smaller independent services. Firstly, while SSDAB has significantly improved access to digital broadcasting, affordability and long-term sustainability remain key challenges. Many community and not-for-profit services continue to operate with limited financial resources, and Ofcom should ensure that its licensing priorities actively support the viability of these services, including ongoing access to affordable digital carriage. Secondly, we would encourage Ofcom to maintain flexibility around analogue licensing, particularly for community radio. Although digital is now the primary direction of travel, analogue platforms (FM) remain important for accessibility, resilience, and reaching underserved audiences. In this context, we would also highlight that if Ofcom were to advertise an FM licence covering Newcastle and Gateshead, Affinity Media NE CIC would strongly consider applying. Our team includes individuals who were involved in Restricted Service Licences (RSLs) and NE1fm in 2007, bringing valuable experience in delivering local radio services to the area. This demonstrates both our commitment to the region and the continued interest and capability within the sector to deliver high-quality analogue services where opportunities arise. Thirdly, we support a licensing framework that encourages local content, diversity, and social value. Community and local radio services play a vital role in reflecting

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	local identity, supporting grassroots culture, and providing trusted information. Licensing priorities should continue to recognise and protect this contribution. Finally, we would welcome continued transparency and engagement from Ofcom as these priorities are implemented, ensuring that smaller operators have a clear understanding of future opportunities and regulatory expectations. In summary, while we agree with the overall direction of the proposed priorities, we recommend that Ofcom: • Ensures affordability and sustainability of SSDAB for smaller broadcasters • Maintains appropriate support for analogue/community radio services • Continues to prioritise localness, diversity, and social value in licensing decisions • Engages closely with the sector throughout implementation This will help ensure that the UK's radio landscape remains diverse, innovative, and accessible to audiences and broadcasters of all sizes.
Question 2: Do you consider that the proposed broadcast licensing priorities for the short to medium term will provide sufficient provision for audiences? Please give reasons for your answer.	Confidential? – Y / N We believe that the proposed broadcast licensing priorities have the potential to provide sufficient provision for audiences in the short to medium term, particularly given the continued expansion and consolidation of Small-Scale DAB (SSDAB) services across the UK. The growth of SSDAB has significantly increased the availability and diversity of radio services, allowing more local, specialist, and community-led content to reach audiences who were previously underserved. This has been a positive development for listener choice and reflects changing listening habits as digital platforms become more widely adopted.

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	However, we would caution that “sufficient provision” should not be measured solely by the number of available services, but also by their accessibility, sustainability, and relevance to local communities. Firstly, while digital coverage continues to improve, not all audiences have equal access to DAB services. Analogue (FM) broadcasting still plays an important role in ensuring universal access, particularly for older listeners, those in areas with variable digital reception, and those who may not have access to digital devices. Retaining a degree of analogue provision is therefore important to avoid excluding segments of the audience. Secondly, the long-term sustainability of smaller broadcasters is critical to maintaining audience provision. If community and independent services face financial or operational challenges—particularly around SSDAB carriage costs—this could reduce the diversity of content available to listeners over time. Ensuring that smaller services remain viable is therefore directly linked to maintaining sufficient audience provision. Thirdly, local content remains a key factor. Audiences benefit not just from more stations, but from stations that reflect their local area, culture, and interests. Community broadcasters, such as Affinity Media NE CIC, play a vital role in delivering locally relevant programming, promoting local events, and providing a platform for local voices. Licensing priorities should continue to support and encourage this type of content. Finally, we believe there is still a role for future analogue licensing opportunities where clear audience demand and local value can be demonstrated. This would help ensure that audiences continue to benefit from a balanced and inclusive radio ecosystem.
Question 3: For post-launch SSDAB multiplex coverage improvement or extension requests only, do you agree with our proposed change in approach to our application of the rule which restricts overlap with local muxes to 40% of the population	Confidential? – Y / N We broadly support Ofcom’s proposed change in approach to the application of the 40% overlap rule for post-launch SSDAB multiplex coverage improvements or extensions.

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already covered by the local mux (the “40% ceiling”)? Please give reasons for your answer.	In practice, the current restriction can limit the ability of SSDAB operators to optimise and stabilise coverage areas, particularly in regions where geography, transmission constraints, or urban density create uneven reception. A more flexible approach would allow multiplex operators to address coverage gaps, improve signal reliability, and deliver a more consistent listening experience for audiences. From an audience perspective, improved coverage is essential. Listeners expect reliable, uninterrupted access to services, and technical limitations should not prevent broadcasters from reaching their intended communities. Allowing reasonable overlap with existing local multiplexes can help achieve this without necessarily undermining the overall structure of the licensing framework. However, we believe this flexibility should be applied in a balanced and proportionate way. The original intent of the 40% ceiling—to protect the viability and distinctiveness of local multiplexes—remains important. Any relaxation of the rule should therefore ensure that it does not lead to unintended consequences, such as market distortion or reduced incentives for investment in local DAB infrastructure. We would also encourage Ofcom to ensure that smaller broadcasters and multiplex operators are not disadvantaged by the process. Clear guidance, transparency in decision-making, and consistency in how requests are assessed will be important to maintain confidence across the sector. From our perspective as a community-focused broadcaster, improved and more reliable SSDAB coverage would directly benefit both listeners and services. It would enable stations like ours to better serve our target audience and strengthen our role within the local media landscape.
Question 4: Do you agree with Ofcom’s analysis in section 3 and at Annex A1 of the existing broadcast licence types?	Confidential? – Y / N We broadly agree with Ofcom’s analysis of the existing broadcast licence types as set out in section 3 and Annex A1. The assessment reflects the significant evolu-

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Please give reasons for your answer.	tion of the UK radio landscape, particularly the transition from analogue-dominated broadcasting to a more diverse, digital-led environment supported by DAB and Small-Scale DAB (SSDAB). The analysis correctly identifies that many of the current licence categories were developed in a different technological and market context, and that the relative importance of analogue licences has shifted as digital platforms have expanded. We agree that this changing landscape justifies a more streamlined and forward-looking approach to licensing. However, we believe it is important that this analysis is not interpreted as reducing the ongoing value of certain licence types—particularly community radio and analogue (FM) licences. Community radio licences continue to play a vital role in delivering social value, supporting local engagement, and providing access to broadcasting for underrepresented groups. These services often operate with limited resources but deliver significant public benefit, which may not be fully captured by a purely structural or market-based analysis. In the North East specifically, we would highlight that there is currently a gap in the provision of a community radio station that caters for a mainstream audience while delivering strong local content such as news, events, and community information. Affinity Radio is already addressing this need effectively via SSDAB, providing locally relevant programming and engagement. However, access to an FM licence would significantly enhance this provision. In the event of securing an FM licence, this would add an important additional layer to the North East radio landscape—improving accessibility, reach, and resilience, while strengthening our ability to serve local communities. Similarly, analogue licences still have an important role in ensuring accessibility and resilience. While digital listening is increasing, FM remains a key platform for reaching certain audiences and maintaining universal

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	access to radio services. In some areas, analogue broadcasting continues to provide more reliable coverage than digital alternatives. We also note that the diversity of licence types has historically supported innovation and plurality within the sector. Any move towards simplification should ensure that it does not inadvertently reduce opportunities for new entrants or smaller operators. From our perspective as a community-focused broadcaster, the continued coexistence of multiple licence types—across both analogue and digital platforms—remains important in supporting a diverse and inclusive radio ecosystem. In summary, while we agree with Ofcom’s overall analysis, we recommend that: • The ongoing value of community radio licences is clearly recognised and protected • Analogue (FM) licences continue to be supported where they deliver audience benefit • Gaps in local provision, such as in the North East, are considered in future licensing decisions • Any simplification of licence types does not reduce diversity or access to broadcasting • The social value of smaller and not-for-profit broadcasters is fully considered This approach will help ensure that future licensing frameworks remain inclusive, flexible, and responsive to the needs of both broadcasters and audiences.
Question 5: Do you agree with our assessment on the impact of our proposed broadcast licensing priorities for the short to medium term at Annex A3? Please give reasons for your answer.	Confidential? – Y / N We broadly agree with Ofcom’s assessment of the likely impact of the proposed broadcast licensing priorities as set out in Annex A3. The assessment reflects the continued transition towards a more digital-focused radio landscape and recognises the efficiencies associated with consolidating licensing activity following the rollout of Small-Scale DAB (SSDAB).

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	However, we believe that the full impact on smaller, community-led broadcasters may be understated in some areas. While the move towards a more streamlined and prioritised licensing approach may improve regulatory efficiency, there is a risk that reduced focus on certain licence types—particularly analogue and smaller-scale services—could have unintended consequences for diversity and local provision. For community broadcasters, sustainability remains a key concern. The reliance on SSDAB, while beneficial in expanding access, introduces ongoing operational costs that can be challenging for not-for-profit organisations. If these pressures are not adequately considered, there is a risk that some services may struggle to maintain long-term viability, which would ultimately impact audience choice and local content provision. In addition, the assessment may not fully capture regional variations in impact. In the North East, for example, there is a clear need for strong, locally focused radio services that provide community news, events, and engagement. Affinity Radio is currently meeting this need via SSDAB; however, additional opportunities—such as access to FM—would significantly enhance our ability to reach wider audiences and strengthen local provision. We also believe that the social value delivered by community broadcasters should be given greater weight when assessing impact. These services contribute not only to media plurality, but also to community cohesion, skills development, and local cultural representation. Finally, we would encourage Ofcom to continue monitoring the real-world impact of these priorities as they are implemented, particularly in relation to smaller operators, to ensure that any unintended negative effects can be addressed in a timely manner.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – Y / N We welcome the opportunity to provide additional comments on Ofcom’s proposals and would like to highlight

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	the importance of maintaining a balanced approach between digital and analogue broadcasting. While we recognise the significant progress made through DAB and Small-Scale DAB (SSDAB), and the benefits these platforms bring in terms of choice and access, we believe there remains a clear and important role for FM broadcasting—particularly for community radio. In the North East, we consider there to be a gap in provision for a mainstream community-focused radio service that delivers local news, information, and engagement alongside broad, accessible programming. Affinity Radio is currently helping to address this through SSDAB, providing a platform that is inclusive, locally relevant, and open to a wide range of contributors. However, we strongly believe that FM broadcasting still holds significant value. It remains widely accessible, reliable, and familiar to many listeners, and continues to play an important role in ensuring universal access to radio services. In our view, DAB is a positive step forward, but it should complement—not replace—analogue provision. We would therefore encourage Ofcom to consider the prioritisation of community FM opportunities in areas such as Newcastle and Gateshead, where there is a clear case for additional local provision. Affinity Media NE CIC would welcome the opportunity to begin a conversation with Ofcom on how we could help deliver and manage such a service, building on our existing experience and track record in providing local radio via SSDAB. We believe we are well placed to help fill this gap and enhance the overall radio landscape in the region. More broadly, we believe that community radio should continue to be supported as a key part of the UK’s broadcasting ecosystem—providing access, opportunity, and a voice for local communities. Services like ours are not only broadcasters, but also platforms for participation, skills development, and community cohesion. In summary, we would encourage Ofcom to: • Continue to recognise the ongoing value of FM broadcasting alongside digital platforms

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	• Consider opportunities to expand community FM provision in underserved areas such as Newcastle and Gateshead • Engage with organisations like Affinity Media NE CIC to explore how these services could be developed and delivered • Ensure that the future licensing framework supports accessibility, inclusion, and local representation We believe this approach will help ensure a balanced, resilient, and truly local radio landscape for the future.

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