



Community Media Association (CMA)

Response to Ofcom Consultation on Radio Licensing

April 2026

Introduction

The Community Media Association (CMA) is the UK representative body for community broadcasting, committed to promoting access to the media for all, and safeguarding the future of not-for-profit media.

Our mission is to enable people to establish media for cultural and creative expression, community development and entertainment.

Having successfully lobbied for the creation of community radio licensing in the UK we continue to support and represent the best interests of not-for-profit broadcasters in an ever-changing landscape driven by technical and social innovation.

We are a members led organisation open to all participants engaged with not-for-profit media. Our growing membership are accessing a network of expertise, best practice and advice drawn from across the UK.

We've been championing community media for over 40 years and are driving dynamic approaches for its future and social value.

As part of our response to this consultation the CMA surveyed both our members and subscribers to our monthly newsletter, as well as others on our mailing lists. The survey only had a short time window for people to respond but we were pleased by both the number and quality of responses. Further details of the survey are given in the confidential annexes.

Question 1: Do you agree with the proposed broadcast licensing priorities for the short to medium term? Please give reasons for your answer

As detailed below, the CMA welcome this consultation and is generally supportive of the path Ofcom outline.



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.

Below we express concerns about local DAB which we believe will have a detrimental impact of SSDAB and consequently may potentially impact on the provision of services for local communities and listeners.

The CMA would have welcomed guidance from Ofcom on what period 'medium term' covers.

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 already covered by the local mux (the "40% ceiling")? Please give reasons for your answer

We welcome this but, as highlighted in our survey, we are concerned that this will increase the carriage charges for CDSP stations who may not be able to recover the additional cost through increased revenue. As such, we are recommending that Ofcom seek their views when considering improvement or extension requests.

Question 4: Do you agree with Ofcom's analysis in section 3 and at Annex A1 of the existing broadcast licence types? Please give reasons for your answer

As a broadbrush analysis this is useful. We note that FM is deemed to be 'better than AM but declining long term' and would caution that does not become a self-fulfilling prophecy.

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.

We note in A3.11 and elsewhere the positive comments that the rollout of SSDAB was able to achieve. We also note in A3.13 that *'our proposals promote innovation and competition and help secure the continued availability of radio services across the UK'*.

As outlined below we are concerned that the proposed expansion of local DAB will potentially hamper SSDAB achieving the objectives outlined above.



Question 6: Do you have any other comments to make on the proposals

Any other comments are covered below.

CMA Executive Summary

The CMA broadly welcomes this consultation and is generally supportive of the aspirations expressed.

There is some disagreement with the level of precedence Ofcom are proposing against some of their proposed actions.

Our greatest concern is over the proposed expansion of local DAB, which we feel could have a detrimental impact on both community radio stations on SSDAB multiplexes as well as the SSDAB multiplexes themselves.

As part of our survey, outlined above, we also addressed three additional areas.

We asked respondents about the financial security of their organisations. The anonymised responses are given in a confidential appendix. We also asked for general feedback. Again, the verbatim comments are in the confidential appendix (again, anonymised).

The last issue we addressed is around the reissuing of licences that have been surrendered or handed back, or where a station holds a licence but have not been broadcasting for a period of time. We believe this is a minor but persistent issue that Ofcom could address with relative ease.

Detailed Comments on Ofcom's Proposals

In our survey, and this response, we address several of the priorities listed in the consultation.

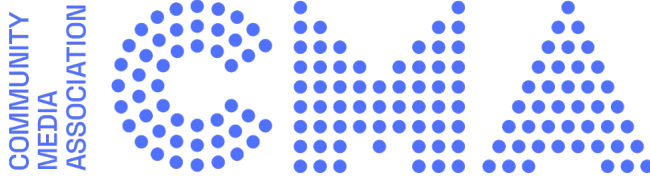
Para 4.6 – New Community FM Radio Licences

"We will consider inviting applications for new community FM radio licences."

Survey Question: Welcome for the FM Licensing Proposal

In our survey we asked

'Do you welcome the Ofcom proposal to return to FM community radio licensing?'



Over 80% of respondents welcomed the proposal, with only one respondent not welcoming the proposal. The rest did not express an opinion.

Survey Question: Expression of Interest Stage

However, when asked

‘Should Ofcom have a preliminary Expression of Interest (EOI) stage to gauge demand and carry out preliminary spectrum analysis?’

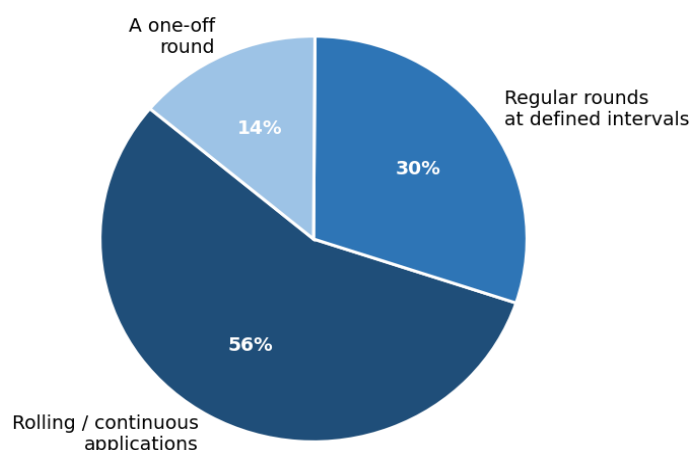
there was more of a divergence of opinion. Of the 85% expressing an opinion, nearly 80% believed there should be a preliminary EOI with just over 20% believing there should not be one.

Survey Question: Best Method for FM Licensing

When asked *“What is the best way for Ofcom to offer FM community radio licensing?”* 85% expressed an opinion, responding as follows:

Rolling or continuous applications with no rounds	56%
Regular rounds at defined intervals	30%
A one-off round is sufficient	14%

What is the best way for Ofcom to offer FM community radio licensing?



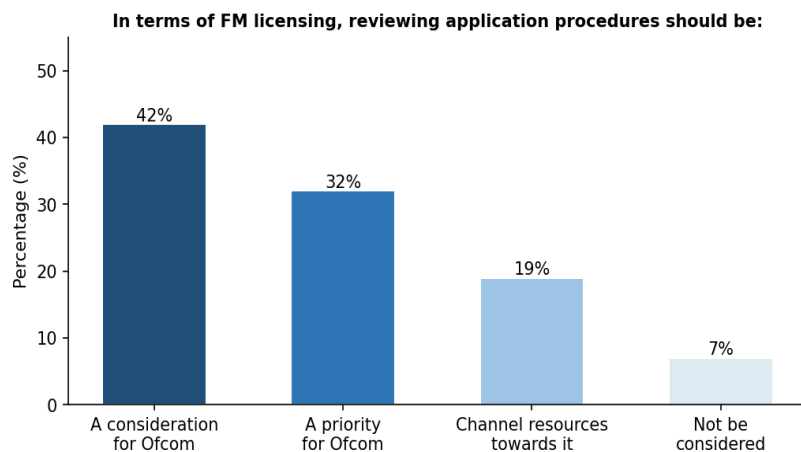


Survey Question: Priority Level for FM Licensing

Our final question on FM licensing asked

'In terms of Ofcom reviewing their procedure for applications for new community FM radio licences should this be'

A consideration for Ofcom	42%
A priority for Ofcom	32%
Something Ofcom should channel resources towards achieving	19%
Not be considered by Ofcom given their other priorities	7%

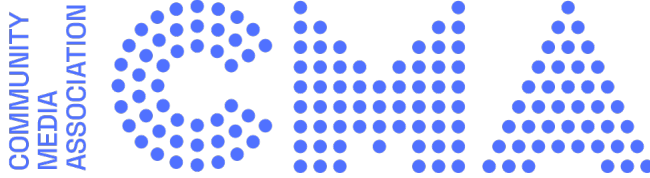


We also asked for respondents to tell us areas where they are aware there is demand for a new FM service. The areas are listed in the confidential appendix.

CMA Summary – Para 4.6: New Community FM Radio Licences

The community media sector clearly welcome Ofcom's consideration of application rounds for new FM community radio licences.

The survey supports (42%) Ofcom's view that this should be a **consideration** for Ofcom (as outlined on para 4.6 of the Consultation). However, we would ask Ofcom to take note that 32% of respondents consider it should be a **priority**. Additionally, there is a clear correlation between respondents who listed areas where there is a demand for FM services and those wanting this to be a **priority** area of work for Ofcom.



We would encourage Ofcom to seriously consider whether some of the areas where respondents have highlighted a demand for FM services can be prioritised. In doing this Ofcom can deal with the long-standing pent-up demand from a significant number of aspiring broadcasters.

40% Overlap Ceiling – More Flexible Approach for SSDAB

"A more flexible approach, where appropriate, in our application of the '40% ceiling' regarding SSDAB."

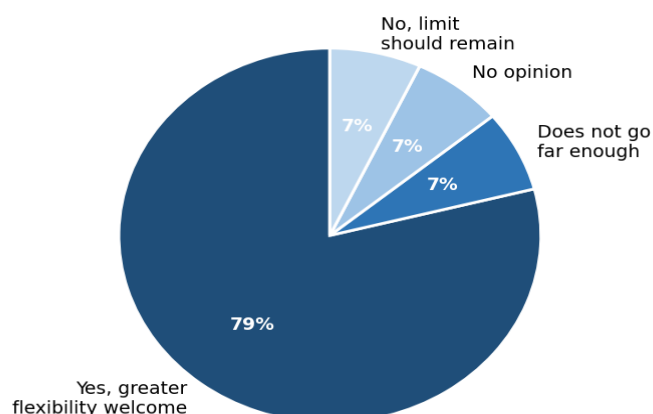
Survey Question: Agreement with Flexible 40% Ceiling

'Ofcom proposes to apply the 40% overlap ceiling more flexibly for post-launch coverage extensions. Do you agree?'

Respondents replied

Yes, greater flexibility is welcome	79%
The proposed flexibility does not go far enough	7%
No opinion	7%
No, the 40% limit should remain unchanged	7%

Do you agree with applying the 40% overlap ceiling more flexibly?



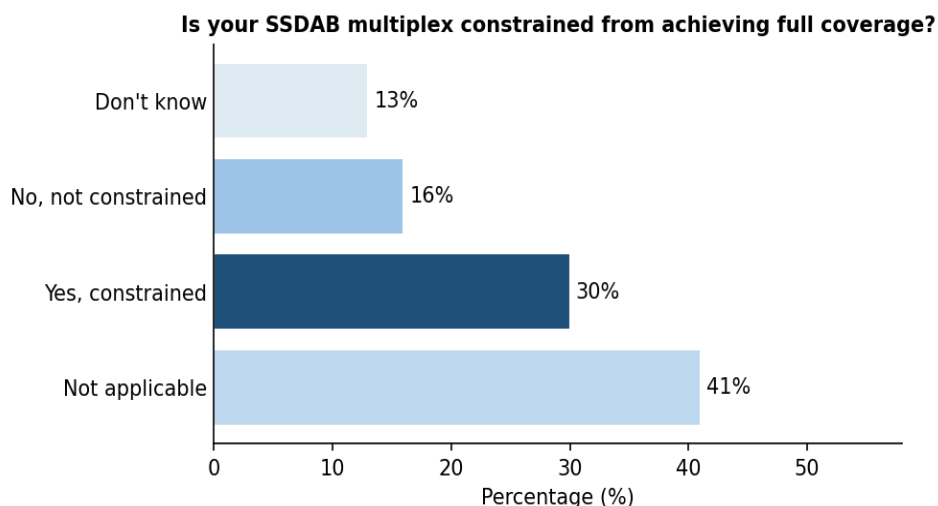


Survey Question: SSDAB Coverage Constraints

In answer to the question

'Is the SSDAB multiplex you are currently on constrained from achieving full coverage of its intended area?'

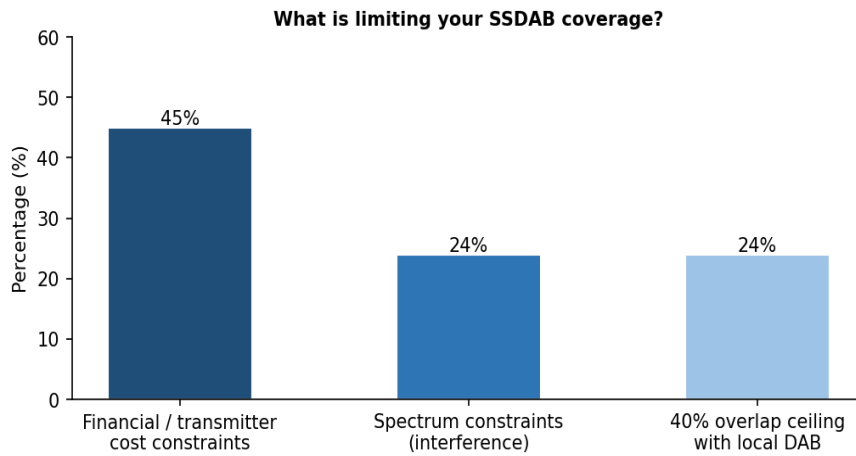
Not applicable	41%
Yes, constrained	30%
No, not constrained	16%
Don't know	13%



If you exclude the 'not applicable' and the 'don't know' there is a two to one majority of respondents who are **constrained** from achieving their full coverage.

Survey Question: Factors Limiting Coverage

When given options to list what *'is limiting your coverage'* 45% of respondents who expressed a view listed 'Financial or transmitter cost constraints', 24% listed 'Spectrum constraints such as interference with adjacent SSDAB or other services' and the same percentage, 24%, listed 'The 40% overlap ceiling with the local DAB multiplex'



Survey Question: Coverage Extension Requirements

When asked *'If you wanted to extend your coverage, what would this require'*, for those who this was applicable and knew, the results were:

One or more additional transmitter sites (with additional costs)	44%
A simple power increase on the existing transmitter (relatively low cost)	56%

Survey Question: Impact on Carriage Costs

We then asked: *'If your multiplex operator applied to Ofcom for a coverage extension, do you believe this would increase your carriage costs?'*:

No, costs would stay the same	18%
Yes, but manageable or offset by additional income from wider coverage	21%
Yes, costs would increase	40%
Don't know	21%

We wanted to investigate whether the sector felt that if Ofcom adopted *'a more flexible approach, where appropriate, in our application of the '40% ceiling'* regarding SSDAB they should take account the views of the stations on the multiplex in question.



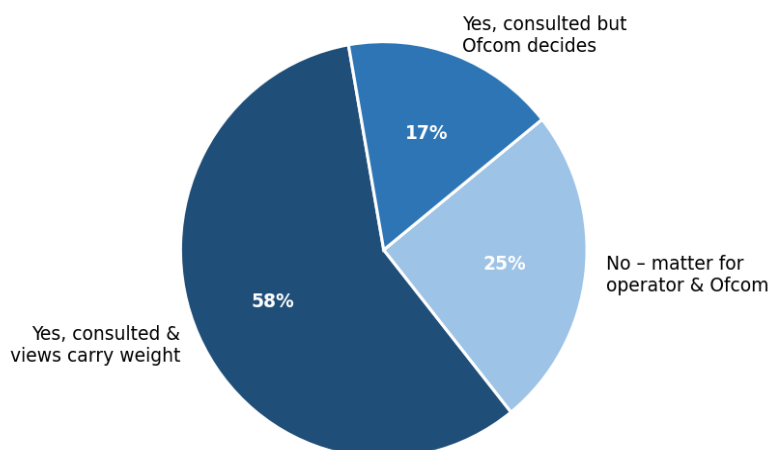
Survey Question:

‘Should community and local stations carried on an SSDAB multiplex have a formal right to be consulted before a coverage extension is approved, and should Ofcom take their views into account?’

For the 87% for whom this question was applicable and had an opinion the responses were:

Yes – stations should be consulted and their views should carry weight	58%
No – coverage extensions are a matter for the multiplex operator and Ofcom	25%
Yes – stations should be consulted but the final decision should rest with Ofcom	17%

Should stations have a formal right to be consulted on coverage extensions?



The responses to our survey question *‘Are you aware of areas not currently served by SSDAB where you believe there is demand for a new multiplex?’* are contained in a confidential appendix

CMA Summary – 40% Overlap Ceiling (SSDAB)

We note that Ofcom propose to channel resources towards this area (paragraph 4.5). The CMA welcomes the proposal of Ofcom to apply the 40% overlap ceiling more flexibly. However, we believe that the community radio stations would appreciate it if their views were considered when multiplex licence holders apply for area extensions.



We would recommend that multiplexes are asked whether they have consulted with their client stations, and whether they expect to raise their charges if successful with their application.

SSDAB Licensing Rounds

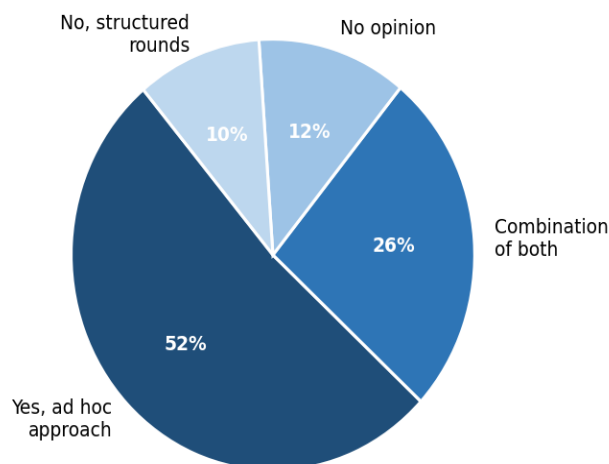
As with FM licencing, we were interested in how respondents view the Ofcom proposals for SSDAB licensing.

Survey Question: Ad Hoc vs Structured Rounds

Do you agree with Ofcom's proposal to move from structured SSDAB licensing rounds to an ad hoc expression-of-interest approach for new SSDAB areas?

Yes, ad hoc expression-of-interest approach	52%
A combination of both (ad hoc for urgent cases, structured rounds otherwise)	26%
No opinion	12%
No, Ofcom should retain structured rounds	10%

Agree with moving from structured SSDAB licensing rounds to ad hoc approach?





Survey Question: Priority for New SSDAB Areas

In terms of Ofcom dealing with requests to advertise new SSDAB multiplex areas this should be:

A consideration for Ofcom	36%
Something Ofcom should channel resources towards achieving	25%
A priority for Ofcom	23%
Not be considered by Ofcom given their other priorities	3%
No opinion	13%

CMA Summary – SSDAB Licensing Rounds

The CMA welcome Ofcom's proposal to prioritise this on an ad hoc basis.

However, we are concerned on the emphasis that Ofcom want the services to be *'likely to launch and have longevity'* and that they are looking to receive *'clear and robust evidence of demand through expressions of interest'* (para 4.3). We would encourage Ofcom to be transparent about what it is they are looking here.

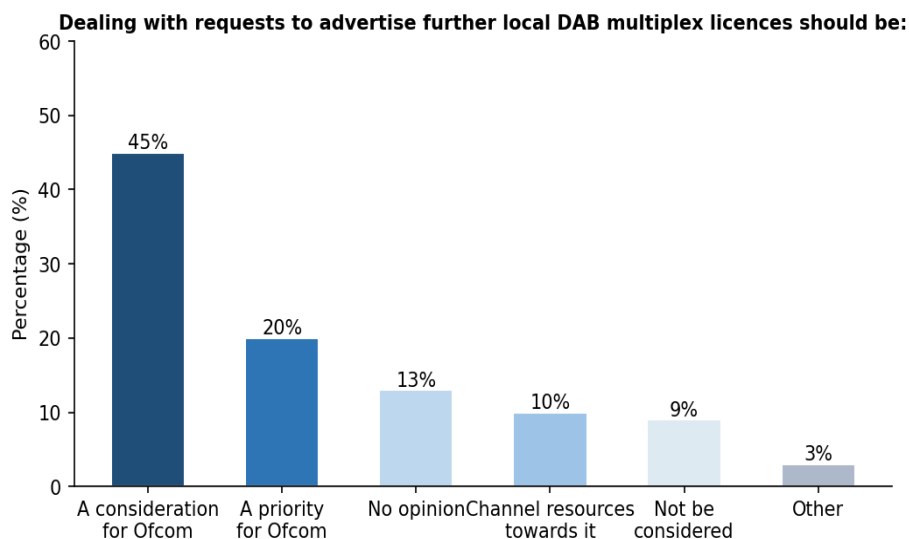
We are also concerned that their proposal to prioritise local DAB multiplex licences will not encourage the growth of SSDAB multiplex areas (see below) and damage the SSDAB sector.

Local DAB Multiplex Licences

Survey Question: Priority for Local DAB

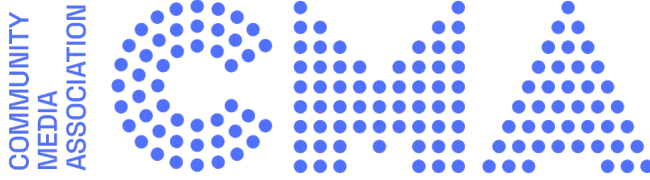
'In terms of Ofcom dealing with requests to advertise further local DAB multiplex licences'.
Respondents felt this should be:

A consideration for Ofcom	45%
A priority for Ofcom	20%
No opinion	13%
Something Ofcom should channel resources towards achieving	10%
Not be considered by Ofcom given their other priorities	9%
Other	3%



CMA Summary – Local DAB

Ofcom propose that this should be a **priority**; most of the respondents to our survey believe it should merely be a **consideration**. The CMA find it difficult to disagree with the views of the survey and would even suggest that local DAB should **not be considered** by Ofcom given their other priorities.



As outlined earlier, the CMA is concerned about Ofcom's proposal to prioritise requests to advertise further local DAB multiplex licences.

We believe this approach poses a danger to the viability to SSDAB multiplexes. There is a distinct possibility that the financially stronger SSDAB stations, likely to be the commercial, will look to migrate to local DAB where they can reach a larger audience. This will see the SSDAB multiplexes losing their best paying stations which will damage them financially and could risk their financial viability and see some of them closing. The result of this would leave communities without their local community radio station and listeners with less choice.

We note in para 4.3 when writing about their proposal to prioritise, where appropriate, requests to advertise new SSDAB multiplex, Ofcom state they wish '*the services to be likely to launch and have longevity*'. This is also the wish of the CMA, but licensing local DAB is unlikely to help existing SSDAB multiplexes, let alone encourage aspiring SSDAB multiplexes.

We note that there is no reserved capacity on local DAB so even if a CDSP community radio station wished to migrate to local DAB they will need to compete for space against financially stronger stations.

Reissuing of Surrendered or Lapsed Licences

The CMA feel this is an issue that needs looking into. We are aware that some licences have either been handed back or were not renewed in time. For most of these stations we believe there is a demand for a community service that is now not being met.

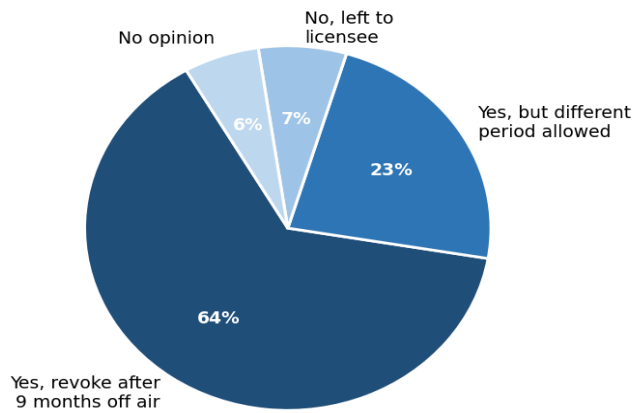
Survey Question: Revocation for Extended Off-Air Periods

'Where a community radio licence holder has stopped broadcasting for an extended period, for example 9 months or more, and not notified Ofcom, should Ofcom actively revoke the licence and re-advertise the frequency?'

Yes, Ofcom should revoke the licence after 9 months off air	64%
Yes, but a different off-air period should be allowed	23%
No, it should be left to the licensee to surrender the licence voluntarily	7%
No opinion	6%



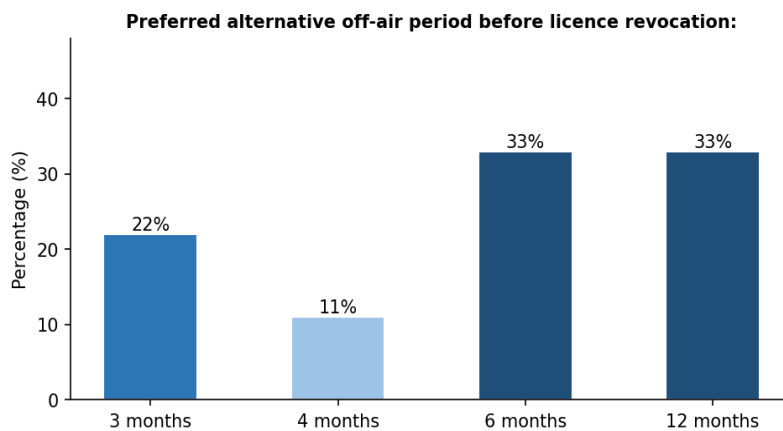
Should Ofcom revoke a licence if a station is off-air for 9+ months?



Survey Question: Preferred Alternative Off-Air Period

If you chose "Yes, but a different off-air period should be allowed", please state the period you think appropriate before Ofcom revoke the licence:

Three months	22%
Four months	11%
Six months	33%
Twelve months	33%



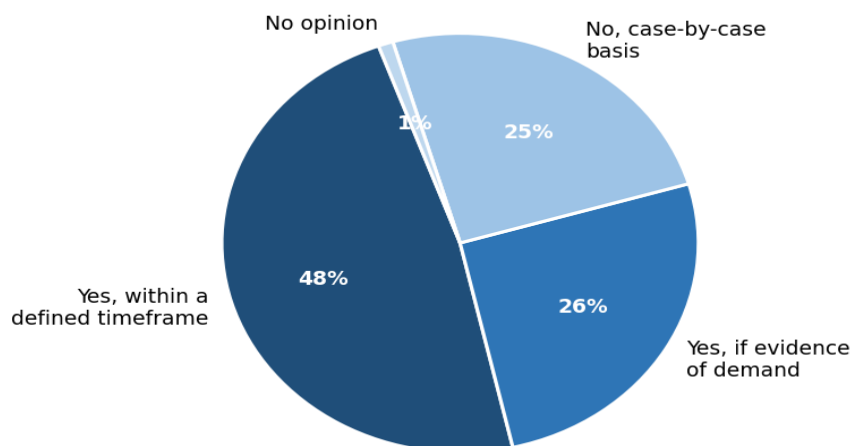


Survey Question: Re-advertising Surrendered Licences

'Where a community radio licence is surrendered, should Ofcom automatically re-advertise the frequency for a new service?'

Yes, within a defined timeframe (e.g. six months)	48%
Yes, but only if there is evidence of demand	26%
No, Ofcom should decide on a case-by-case basis	25%
No opinion	1%

Should Ofcom automatically re-advertise a surrendered licence?



CMA Summary – Reissuing of Surrendered or Lapsed Licences

We believe this is an issue that Ofcom should consider. Our survey shows the sector is in favour of revoking the licence of a station that has stopped broadcasting and not been in contact with Ofcom. However, there is a belief the licence should be readvertised within a defined and reasonable timeframe.

Letting a community radio licence simply lapse is highly undesirable and goes against what everyone in the sector is trying to achieve.

The CMA feel that often in these cases there is a demand for a community radio station that has not been met for all sorts of legitimate reasons. It seems unjust and, given the effort



made by Ofcom to find the spectrum, wasteful for Ofcom not to take the opportunity to investigate whether others could not meet that need.

The CMA would be happy to work with Ofcom and other sector bodies when these incidents occur.

— END OF RESPONSE —