

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? – N We believe priority should be given to licensing spectrum that delivers the greatest market impact and benefits the largest number of listeners. In practice, this means prioritising the release of new, additional local DAB multiplexes in urban areas that can provide new services and increase competition in meaningful markets. Ofcom should consider regulatory intervention to improve National DAB availability by using the existing spectrum, including spectrum currently allocated to the BBC. Over the past decade, Ofcom’s near-exclusive focus on SSDAB and community FM licensing has had unintended consequences that have held back development of the wider UK radio industry. By focusing regulatory effort on the small-scale and community sectors—both sub-scale and reaching relatively minor audiences—the two largest commercial operators have effectively been gifted long-term local and regional dominance. This is not good for competition or for the current Government’s stated Growth agenda. The UK radio market is now dominated by two major commercial operators. This concentration limits audience choice. Different owners can bring different content ideas, investment strategies, job opportunities and creative approaches, and Ofcom should take a more active role in encouraging plurality – particularly in areas where the station operator is also a significant shareholder in the multiplex. With the BBC reducing investment in local and regional radio, there is an even stronger need for Ofcom to adopt policies that promote competition and broaden listener choice. Having previously decided not to offer FM spectrum for the commercial sector we do not believe that existing community services should be allowed to expand so substantially that their coverage area meaningfully mirrors licenced areas of commercial services.

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	Ofcom should consider the extension of Local DAB licenses beyond 2030 so that licensees can plan their business into the future.
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? – N No. UK audiences today face severely limited choice due to ownership concentration and long-term consolidation, which has eroded the diversity of local content and local personalities available on air. While operators such as Nation Broadcasting help introduce much-needed variety, our ability—and that of others—to scale and deliver competitive services has been materially constrained by the slow pace of Ofcom’s licensing and its priorities over the past decade. Examples include Ofcom identifying local DAB opportunities in Central Scotland more than ten years ago yet leaving this spectrum unallocated and unused. It is a lost opportunity. After years of attempting to secure progress, we simply stopped engaging with Ofcom Scotland due to the lack of movement. Similar long-standing gaps exist in regions such as North East England. In the absence of DAB opportunities, operators have instead developed IP-based services, which involve lighter regulation but represent a lost opportunity for spectrum-based competition, local content, and listener benefit. The current licensing priorities therefore do not provide sufficient audience provision and fail to acknowledge the future challenges the sector may face at National and Regional level given the interdependency with DTT transmission sites.
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? – N Nation outlined the challenges of the sector in its previous consultation submissions, and these issues have now materialised. Operating SSDAB multiplexes is resource-intensive, complex, and difficult to sustain under the current rules.

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already covered by the local mux (the “40% ceiling”)? Please give reasons for your answer.	The limitations placed on SSDAB are not fit for a modern media environment. They constrain service expansion, disincentivise investment, and limit competition and listener benefit. These restrictions should be substantially relaxed or removed in the future.
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.	Confidential? – N No answer provided.
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? – N No. SSDAB has demonstrated limited demand and limited listener impact. Most multiplexes – outside Urban areas of high population (See answer to Question1 above) - attract no competitive bids. It underlines that operators do not view SSDAB as commercially attractive or capable of supporting meaningful audience reach or a commercial return. Ofcom’s priorities appear inverted. Instead of determining spectrum availability first and then inviting operators to compete within that constraint, Ofcom should begin with a thorough review of commercial opportunity and market needs, and then identify the spectrum required to support those services and maximise listener benefit.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – N Ofcom should publish a full audit of all existing and potential spectrum opportunities (FM and DAB), including trade-offs, which could support commercial radio development. This would allow operators to identify viable future services—for example, the possibility of new FM capacity in areas such as Aberdeen.

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	Similarly, a comprehensive replan of community radio spectrum could free significant capacity for new FM licences. In instances where community spectrum is used merely to relay centrally-produced content from London, licences should be reconsidered. There are multiple cases where frequencies could be reassigned more efficiently to deliver genuine local content and improved listener outcomes. Ofcom could be far more proactive in unlocking spectrum, promoting competition, and supporting the long-term health of the UK radio sector. The strict 18-month launch limit for SSDAB is not fit for purpose and needs to be changed. There is a very distinct difference between companies being awarded a licence and then establishing that they do not have the resource or demand to launch and then wait for the period to time-out against some of the detailed constraints around planning, site survey, site access and even weather events which can take up such a significant portion of the pre-launch period at no fault of the awardee.

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