

RADIOCENTRE SUBMISSION TO OFCOM CONSULTATION ON ITS PROPOSED LICENSING PRIORITIES FOR ANALOGUE AND DIGITAL RADIO

SUMMARY

1. Radiocentre welcomes the opportunity to respond to Ofcom's consultation¹ on its proposed licensing priorities for analogue and digital radio. Ofcom's strategic and holistic view of the radio landscape broadly supports a focus on maximising the effective use of finite spectrum for the benefit of UK audiences.
2. Listening habits continue to change and there has been a significant shift in distribution in recent years from analogue (AM/FM) to digital (DAB and online), which has accelerated ahead of forecasts. In particular, the share of listening on connected devices has more than doubled in the past decade, from 14% in Q4 2015 to 30% in Q4 2025, with the majority of IP connected listening now taking place via smart speakers.
3. Despite these changes, analogue distribution still remains an important distribution platform for a sizable proportion of commercial radio listening (20%). This remains particularly true for in car listening, where there are many older cars on the road with FM receivers, as well as in more rural areas with poor internet coverage. Overall, total broadcast platforms (analogue and DAB/DTV) still account for the vast majority (67%) of commercial radio listening, with DAB alone accounting for just under half (45%) of total commercial radio listening hours.
4. The priorities should also be considered in the context of the joint industry and Department for Culture, Media & Sport (DCMS)'s Digital Radio & Audio Review², which will assess future scenarios for the consumption and distribution of UK radio and audio content, including the long-term future of analogue distribution. We therefore recommend that Ofcom retain flexibility to revise these priorities in accordance with any recommendations.
5. While we agree in principle with Ofcom's proposals, we have highlighted some areas of concern, which are set out in response to the questions below.

QUESTIONS

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

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.

6. We broadly support Ofcom's timely review of its licensing priorities, which largely reflects the evolving broadcasting landscape and changing listening habits. For those priorities to ensure the best outcomes for audiences, they must be implemented in a way that continues to support existing analogue services where they remain important, while also improving digital access and coverage for smaller commercial operators.

¹ [Consultation: Ofcom's licensing priorities for analogue and digital radio – Ofcom.org.uk](https://www.ofcom.gov.uk/consult/condocs/radio/radio_2025/radio_2025_consultation_statement.pdf)

² [Ministers kick off review to safeguard radio's future - GOV.UK](https://www.gov.uk/government/news/ministers-kick-off-review-to-safeguard-radio-s-future)

7. Small-Scale DAB (SSDAB) is used across the UK by local commercial and community radio broadcasters that utilise Digital Sound Programme (DSP) and Community Digital Sound Programme (C-DSP) licences. SSDAB multiplexes provide local broadcasters with a cost-effective way of reaching audiences on DAB, with Ofcom noting in March that the 100th multiplex has now launched.
8. While this continued innovation is welcome, Ofcom must also explicitly safeguard the sustainability of existing commercial multiplexes and services by avoiding an excess of overlapping SSDAB capacity. Due regard should also be given to the impact of any new local DAB multiplexes on existing local services.
9. Several Radiocentre members have highlighted the importance of improving national DAB coverage and spectrum availability over time, in order to support a wider range of services and ensure that operators have the opportunity to reach audiences on this key broadcast radio distribution platform. Ofcom should therefore review prioritising projects which aim to find further bandwidth on the existing national DAB multiplexes.
10. As DCMS conducts a new Digital Radio & Audio Review it may wish to consider future distribution on the BBC's national multiplex, which if it were to move to DAB+ could provide new national capacity for commercial radio broadcasters.

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.

11. Ofcom proposes that the 40% ceiling could be “*rebutted in exceptional circumstances where significant public benefit could be achieved through minimal exceedance of the 40% level*”.
12. We acknowledge the important role that SSDAB can play in reaching niche and under-served audiences through community radio. In principle, we are not opposed to taking a more flexible approach. Small commercial radio operators also play a very important role on SSDAB serving local audiences. Some members have also noted challenges with the current framework, with complaints from listeners and local advertisers over poor existing SSDAB coverage.
13. With regard to community radio operators, Ofcom should continue to give consideration to a report commissioned by Radiocentre in 2018³ that highlighted how some of the smallest commercial radio stations can be placed at real risk when less dutiful, or unduly competitive, community stations are launched in their areas. Community radio has also been given considerable flexibility in recent years, including changes to advertising revenue limits⁴ and the removal of most key commitments⁵ for analogue services. Taken together, these changes could create further competitive pressure for smaller, independent commercial radio operators.
14. It is also the case that 40% represents a significant percentage of coverage. It will therefore be important that any flexibility remains genuinely exceptional, is applied transparently, and

³ <https://www.radiocentre.org/wp-content/uploads/2018/11/SMALL-SCALE-RADIO-IN-THE-UK-PRINT.pdf>

⁴ [New measures to generate growth and greater financial sustainability in community radio - GOV.UK](#)

⁵ [Statement: Community Radio - future approach to Key Commitments](#)

is supported by clear published criteria. Ofcom should clarify what it considers to be “*significant public benefit*” and “*minimal exceedance*”. We understand that some operators have had practical concerns in certain instances with Ofcom’s coverage maps and signal strength, impacting on the potential viability of some smaller services.

15. Where exceedance is proposed, Ofcom should carry out a full impact assessment on neighbouring commercial stations, giving affected providers and existing multiplex operators the opportunity to comment. This should take into consideration the extent to which services provided on SSDAB are distinct from other local commercial services and the potential impact on advertising revenue.
16. Some members also highlighted that Ofcom should carry out an impact assessment on the SSDAB sector ahead of licencing any new local DAB multiplexes.

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 answers.

17. We broadly agree with Ofcom’s analysis. This framework is relevant for the short and medium term. We also recognise that this work will be informed by the outcome of the ongoing DCMS Digital Radio & Audio Review, which is expected to publish its report by the end of 2026, followed by a government response in early 2027.

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.

18. We are broadly supportive Ofcom’s assessment of the impact of its licensing approach, including the positive impact of services that bring social, cultural and economic benefits to local and minority communities.
19. In addition to the areas identified by Ofcom, consideration should also be given to the potential for incremental SSDAB overlap or new local multiplexes to erode listening and revenue for existing local/regional multiplexes. Continued operational viability is a strategically important element of the network relied upon by millions of listeners.
20. Ofcom should also consider how it will provide operators with continued licence stability and renewal options for commercial radio FM licences following the outcome of relevant recommendations within the Digital Radio & Audio Review. We would welcome clarification within the subsequent consultation statement on these issues, alongside further opportunities for stakeholders, both large and small, to engage with Ofcom as the market develops.

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

21. We would welcome Ofcom publishing clear service standards and timelines for processing licence variations and DAB technical changes to enable stakeholders to plan network upgrades efficiently with transmission partners.
22. Ofcom should also keep under review the extent to which its licensing approach supports a sustainable and coherent spectrum infrastructure across analogue, DAB and SSDAB, while

guarding against unintended outcomes that could undermine broadcast distribution models or future growth opportunities.

23. Finally, as noted in response to some of the other consultation questions, Ofcom's licensing strategy must remain aligned with the forthcoming DCMS Digital Radio & Audio Review to ensure coherent decisions on FM longevity, DAB development and SSDAB growth, and to provide long-term business certainty.

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