

Your response

Foreword about the UK Community Radio Network

The UK Community Radio Network is the national sector body that represents, supports, and helps to develop Ofcom-licenced community radio across the United Kingdom. We are a whole sector body without membership, engaging directly with station managers and management representatives through regular dialogue, monthly meetings, and national events. We are a registered Community Interest Company, Company No. 13700623. Our recent activity includes regular engagement with Ofcom and DCMS, joint work on consultations affecting analogue community radio and small scale DAB, advocacy for an increased Community Radio Fund, sector support on compliance and election coverage, and collaborative partnerships with universities and sector bodies to evidence the impact of community radio.

The response to this consultation has been drawn from our recent consultation on the future of FM licensing and the Ofcom consultation

<https://radiotoday.co.uk/2026/02/ukcrn-urges-response-to-ofcom-consultation-and-government-radio-review/> our continued campaigning for the future of FM licensing
<https://radiotoday.co.uk/2026/01/community-radio-group-presses-ofcom-on-future-fm-licensing/>

As well as our regular engagement with stations and station management including via our monthly managers/management meetings.

We're able to provide additional direct quotes from stations on request.

Question	Your response
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 support the majority of the Ofcom proposed priorities. FM Community Radio should remain an active and protected part of the work of Ofcom, and not be regarded as a legacy platform. There is strong support from the sector that FM is essential for many communities across the UK for a variety of factors, including coverage, affordability (for listeners and broadcasters), and cultural needs and practice. We have found continued and growing support for new analogue FM licences, and do not agree that they should be only used in areas where there is no SSDAB coverage. Any area which can show demand and support for an analogue licence should be allowed to apply, this could and should include:

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	Areas where SSDAB provides no or little coverage of the population/community that is in need of a service. Areas where there have been existing analogue CR licences that have been handed back in the past 5+ years, in particular when it was against the wishes of the community. In fact, Ofcom should have a continuous process to provide opportunities for new stations to apply when a licence is not renewed or surrendered. Ofcom should also have the capacity and an approach to deal with ad hoc / on demand for new FM licence applications in instances where existing licences are not renewed or are handed back, especially when its against the will of the local community, or there is evidence of support and demand. Ofcom should not just run a single round of FM Community Radio licences and then never issue any new licences in this proposed short-to-medium-term approach. We agree that Ofcom should continue to deal with applications for renewals and extensions for analogue community radio, as well as supporting technical changes, coverage improvements and expansions. With SSDAB, we believe that areas already licensed and yet to launch should be given space to launch, to then provide a greater understanding of areas underserved. However, outside of those areas, Ofcom should consider supporting coverage improvements and expansions of existing SSDAB to improve their sustainability, as well as looking at advertising new or readvertising SSDAB areas. We do not consider the wider benefits of licensing new local DAB areas, when SSDAB should be supported to grow and develop to better serve wider audiences. Local DAB is often not suitable for Community Radio, has no provision for reserved capacity for C-DSPs, and is largely unaffordable for Community Radio.
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 Yes - Community Radio provides a vital role for audiences of location, identity and interest. FM must continue for the long term to support a diversity of community listeners, stations feel that FM is critical for older audiences, ethnic minority and faith

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	communities, rural and island populations and those households who are digitally excluded.
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.	Confidential? – N Yes, there needs to be a pragmatic case-by-case basis, to support the viability and sustainability of SSDAB, especially existing multiplexes that are constrained by the current 40% implementation. Providing greater flexibility alongside an approach to support coverage improvements and expansions will provide greater viability and sustainability for existing multiplexes. Ofcom does need to be cautious on the monopoly of areas by single operators/consortium operators, especially if it means that community licences are priced off the multiplex.
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 Not in the whole, as we disagree with Ofcom's approach of the longer-term decline of FM at a local community radio level. We ask that Ofcom and other parts of Government (including DCMS) move away from this framing of FM as declining without strong and direct evidence of that at a local level. While we acknowledge that this may be the case at a national or regional level, community radio and the local audiences served are in a very different situation from the engagement we’ve received from stations and their listeners. With analogue AM community radio, Ofcom needs to consider if there is demand and support from services and audiences, then why not maximise the use of the spectrum as per Ofcom's legal remit to maximise all spectrum, especially with how much interest there has been in AM traditionally in regard to minority communities.
Question 5: Do you agree with our assessment on the impact of our proposed broadcast licensing	Confidential? – N Yes, although we want to restate the case of grow and continued support for analogue FM community radio. Your impact assessment failed to fully make the case

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priorities for the short to medium term at Annex A3? Please give reasons for your answer.	(that we believe is there) as to why there needs to be longevity for FM long into the future.
Question 6: Do you have any other comments to make on the proposals?	Confidential? – also N We do wish to challenge Ofcom and the Government's continued reliance on Rajar data when deciding on policy for Community Radio. While their methodology works for them, it is designed for regional/large commercial / BBC stations as well as national brands. They have very little direct survey data bespoke to community radio, and the measurement of DAB/Digital only national brands, we believe, distorts their data in terms of audience listenership against FM. Other surveys we've seen conducted by community radio stations show a much higher level of listenership for FM. We would encourage Ofcom and/or the DCMS to commission independent, dedicated research to look at community radio platform listenership, or a broader audience listenership that looks at percentages of listenership by platform, not just by hours. Ofcom should also consider a business case/market analysis on the affordability and actual costs charged by SSDAB multiplexes, as well as the ownership considerations that can impact community radio. Stations report concerns about the long-term affordability of multiplex coverage, with stations seeing that FM is the best long-term, sustainable means of coverage, best suited to serve their community.

Please complete this form in full and return to broadcast.licensing@ofcom.org.uk.