

## Your response

Question	Your response
<p><b>Question 1:</b> Do you agree with the findings from our review of the BBC's assessment of the public value of the Proposals? Please provide evidence to support your views.</p>	Yes
<p><b>Question 2:</b> Do you agree with our assessment of the likely impact of the proposals on fair and effective competition? Please provide evidence to support your views.</p>	Yes
<p><b>Question 3:</b> Do you agree with our provisional conclusion that the public value associated with the BBC's proposals justified the adverse impact on fair and effective competition that we have identified? Please provide evidence to support your views.</p>	Yes
<p><b>Question 4:</b> Do you agree with our proposals on the Operating Licence conditions that should apply to BBC Radio Cymru 2? Please provide evidence to support your views.</p>	Yes

The NUJ welcomes the proposed expansion of BBC Radio Cymru 2 into a full separate radio station. The consolidation of commercial radio in recent years has reduced the content specifically provided for Welsh audiences, including Welsh language content. This demonstrates the importance of the BBC Wales stations in serving the needs of these audiences. Ofcom is right to take the view that an expanded Radio Cymru 2 is unlikely to have any significant impact on those commercial stations that offer a minimal Welsh language service.

Ofcom is also right to conclude that Radio Cymru 2 will compete to some extent with Capital Cymru in the area covered by that station. As a commercial company, the station's owners should welcome such competition. Broadcasters in general should not regard reaching audiences as a zero-sum game, where they compete for share of a fixed number of listeners. They should aim to grow audiences by serving them well.

The NUJ particularly welcomes Ofcom's insistence that, as a fully-fledged radio station, Radio Cymru 2 must provide regular news bulletins.

The NUJ is part of an industry group which published the report, [Of and For Wales: towards a sustainable future for public interest journalism](#), which argues that access to trustworthy and accurate news which holds the powerful to account and protects Welsh-language journalism is essential for a democratic Wales. It calls for public service journalism to be designated as a public service, which will trigger public funding, and an institute, independent from government, to raise funds, administer government grants and foster a diverse and vibrant media industry ([NUJ press release](#)).

The NUJ sees the proposed expansion as welcome addition to the media offering for the people of Wales. Our concern, however, is funding: the BBC has seen its budget decrease by 30 per cent in the past decade. That is why the industry group believes the provision of public interest journalism should be supported by the government, with an arm's length organisation to generate new funding paths, as well as distributing any government grants. The success of BBC Radio Cymru 2 may well depend on this.

Please complete this form in full and return to [BBCRadioCymru2.assessment@ofcom.org.uk](mailto:BBCRadioCymru2.assessment@ofcom.org.uk).