

RADIOCENTRE RESPONSE TO OFCOM CONSULTATION ON THE BBC'S PROPOSALS FOR BBC RADIO CYMRU 2

1. Radiocentre welcomes this opportunity to input into Ofcom's consultation on the BBC's proposals for BBC Radio Cymru 2. As we noted in our submission¹ to the BBC's initial call for evidence in August, this is the first time that there has been a Public Interest Test (PIT) for a new radio service from the BBC and marks a positive step in providing more open and transparent engagement with the commercial sector.
2. The BBC plays an important role in the UK radio and audio sector. It also holds an extremely privileged position due to the scale of funding it receives, its unrivalled broadcast network and cross-promotion activities. Its best and most distinctive content provides a significant range and quality of content for audiences. Some of its services, including the educational documentaries and Welsh-language speech content on BBC Radio Cymru, would simply not be possible to provide on a commercial basis.
3. However, it is important that these services remain truly distinctive. Radiocentre has previously raised concerns² where the BBC's popular music services exhibit high levels of crossover and duplication with the commercial offering, particularly during peak times.
4. In our submission to the BBC over the summer, we made three recommendations that we thought would help to ensure that BBC Radio Cymru 2 remains distinctive from commercial radio music services in Wales:
 - The BBC should provide more information about the content of the music output and proposed music playlists.
 - The BBC should provide greater transparency about future plans for the Radio Cymru 2.
 - The BBC should recommend to Ofcom Operating Licence conditions for Radio Cymru 2.
5. In its response to the Public Interest Test consultation, the BBC helpfully clarified that the proposed music playlists would have at least 50% Welsh language music across all broadcast slots, and noted that it did not currently have any future plans for Radio Cymru 2. It also stated that it would be for Ofcom to determine the Operating Licence conditions that apply to the new service.
6. We recommended that, at minimum, new Operating Licence conditions should largely mirror those currently in place for Radio Cymru (with the additional focus on consistency of Welsh-language music output noted above). These clear and measurable quotas will help ensure that the service remains distinctive and does not impact negatively on fair and effective competition.
7. We are therefore pleased to see that Ofcom has proposed that the service contribute to the current Operating Licence conditions (4.51 and 4.52) that secure the delivery of content of

¹ <https://www.radiocentre.org/wp-content/uploads/2023/10/PIT-Radio-Cymru-Radiocentre-Response-FINAL.pdf>

² <https://www.radiocentre.org/wp-content/uploads/2023/01/RC-response-to-Ofcom-Modernising-the-BBCs-Operating-Licence-September-2022-FINAL.pdf>

interest and relevance and music of relevance to audiences in Wales. We note that Ofcom has decided not to impose a condition on the percentage of Welsh-language music played on the service, as it expects the BBC to monitor this under condition 4.52. Nevertheless, we believe that this should be reconsidered if the BBC fails to provide sufficient transparency about the proportion of Welsh-language music output on the service or begins to fall short of its commitment to broadcast at least 50% Welsh-language music across each programming block.

8. We also support the proposed condition on Radio Cymru 2 for the delivery of news bulletins daily and regularly Monday to Saturday and daily news bulletins on Sunday to secure news content on the service. We expect that Ofcom will closely scrutinise the BBC's plans to deliver news on Radio Cymru 2 and ensure that bulletins are frequent enough to genuinely deliver on the BBC's public purpose objectives.
9. We continue to support Ofcom in its work holding the BBC to account for meeting its public service obligations by retaining clear, quantifiable regulatory conditions and will continue to monitor further developments in this area closely.

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ABOUT RADIOCENTRE

Radiocentre is the industry body for commercial radio. We work on behalf of over 50 stakeholders who operate over 300 licensed radio stations across the UK and represent 90% of commercial radio in terms of listening and revenue.

www.radiocentre.org