



# OFCOM 'Radio: the implications of Digital Britain for localness regulation'

## BECTU Response

BECTU

1. BECTU is the trade union for workers (other than performers and journalists) in the audiovisual and live entertainment sectors. We have long had a membership in the radio sector, specifically including commercial radio. We have contributed to previous consultations on radio policy, including 'Radio: Preparing for the Future' and have consistently questioned Ofcom's deregulatory thrust in this sector. Our views on the current consultation are presented in summary form and on key questions only.

### Regional Stations

2. We note Proposal 1: 'regional stations allowed to share programming to become national stations'.
3. We remain to be convinced of the merit of this proposal, certainly in England. We believe that the 'possible loss of local (regional) programming which consumers may value' is indeed a significant drawback when set against the dubious commercial benefits of shared programming. As conceded by Ofcom, these stations' local content would become less of a defining characteristic - which is regrettable.
4. We acknowledge and welcome the requirement that stations in Scotland and Wales would be required to retain their specific nation focus.

### Local Stations

5. We note:
  - Proposal 3: co-location within a new set of defined areas
  - Proposal 4: programme sharing within the newly defined areas
  - Proposal 7: amendments to guidelines for AM stations
6. While acknowledging the problem of commercial viability for some stations, we remain supportive of strong localness guidelines. We agree that 'it is important for local material to be generally produced in or near the area the station is broadcasting to' and that 'the essence of local radio depends upon the presenters being rooted in the communities they are broadcasting to'.
7. We note that current localness guidelines require most FM stations to broadcast at least 10 hours a day of locally-made programming containing local material. Underlying this, we note that audience research consistently shows that the public value local content on commercial radio.

8. We would therefore totally oppose any proposal to remove all localness regulations and remain extremely cautious about co-location and programme-sharing proposals. We seek stronger evidence that the cost ('potential loss of services' at local level) would be justified by securing the viability of services (with meaningful local content) which would otherwise cease broadcasting.

### News

9. We note Proposal 6: an enhanced news option for local FM stations ie the option of reducing from 10 hours a day of local programming to a minimum of 7 hours per day in exchange for enhanced local news ('local news, regularly refreshed and updated, at least hourly during weekday daytimes').
10. We certainly support strong local radio news provision, noting that 'listeners value news more than other content on local commercial radio' and that there are broader social and democratic benefits since listening to radio news 'helps to make listeners better informed and therefore better able to participate in a democratic society'.
11. However, we question the rationale of reducing the overall local content requirements (from 10 hours to 7 hours per day) for an 'enhanced news option' which is largely undefined and gives no firm commitment to quality (and thereby to the professional input underlying this quality). We note that Ofcom seem unsure of the merits of this proposal, and 'do not expect it to afford significant additional viability'. If it cannot even be justified on narrow grounds of increasing commercial viability, we remain unconvinced of the overall merit of this proposal.