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## What are your comments on these proposals?

Scottish Screen is the national government-backed agency responsible for developing all aspects of screen industry and culture across Scotland, focusing on the following five priority objectives:

1. Education – to ensure that people of all ages and backgrounds are inspired and equipped to analyse, appreciate, explore, create and share screen media;
2. Enterprise and Skills - to ensure that there are appropriate levels of skilled individuals and viable companies to sustain all aspects of the screen industries across Scotland;
3. Inward Investment and Communications - to promote Scotland as a dynamic, competitive and successful screen production hub;
4. Market Development - to ensure that the widest range of screen product reaches and is appreciated by a diversity of audiences;
5. Talent and Creativity - to identify nurture, develop, support and progress Scotland's screen talent and screen production companies.

Historically, radio has had a relatively low profile as part of Scottish Screen's portfolio of screen media responsibilities. However, radio has served as an important entry point for many of those who subsequently worked elsewhere in the screen industries (comedy being one notable example) and the increasing pace of convergence of audiovisual technology has only served to highlight the transferability of relevant talent, skills and competencies. Further, radio has played a key role in the cultural lives of local communities, to a degree that (at least until now) has been beyond the capability of television.

We believe that it is essential that any changes to current regulatory intervention should not jeopardise the sustainability of a diverse and vibrant radio sector in Scotland and that this should be the primary objective of any such regulatory changes in so far as they impact on Scotland. Reducing the amount of intervention, realignment of ownership rules and freeing-up spectrum in the longer term should be viewed as part of a preferred approach to ensuring the sustainability of a diverse and vibrant radio sector, *ceteris paribus*, rather than as primary objectives in their own right.

Scottish Screen therefore welcomes this opportunity to comment on Ofcom's consultation on the Future of Radio.

While the radio sector environment is undoubtedly changing and there is strong pressure for accelerated change from certain parts of the industry, we would stress the need for careful and detailed consideration of the impact of regulatory change on the complex and often fragile radio broadcasting ecology. It is also true that, as Ofcom have observed, the radio ecology in Scotland has a number of distinctive characteristics, including:

- The relative strength of the local commercial radio sector in Scotland (with an audience share in 2006 of 43% compared with a total UK equivalent of 32%) and the relative weakness of BBC Radio (45% share across both Network and Local/National stations compared with a UK figure of 55%);<sup>1</sup>

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<sup>1</sup> *The Communications Market Report, Nations and Regions: Scotland*, par. 4.2.2.2, page 149, Ofcom, 24 May 2007.

- Scotland's more dispersed population, reflected in the relatively large proportion of Scottish stations (41%, compared with 25% in England) with a potential reach of less than 100,00 people<sup>2</sup> and the large geographical areas of the country – particularly the Highlands and Islands and the Borders – which are not served by digital radio multiplexes<sup>3</sup>;
- The important role of Scottish Gaelic radio programming;<sup>4</sup>
- The unique and successful network of community radio stations across the Highlands and Islands which pre-date the current Community Radio licensing regime and still operate under the commercial regime, such as Lochbroom FM and Heartland FM;<sup>5</sup> and
- The valuable and ground-breaking work of the Moray Firth Media Trust (MFMT), a non-profit making organisation part funded by the European Social Fund, HIE, Local Enterprise Companies, Awards for All lottery funding and Moray Firth Radio (MFR); based within MFR, it delivers quality training and work experience and offers the Certificate in Radio Broadcasting - the only vocationally-based qualification for 'beginner' radio presenters in the whole of the UK which uses practical, hands-on work experience in radio broadcasting.<sup>6</sup>

While we are certainly not opposed to change, we believe there is a need for detailed analysis of the specific implications of any changes for the long term health of radio in Scotland and therefore welcome the earlier reported comments of Ofcom's Advisory Council for Scotland:

"Ofcom's Advisory Council for Scotland noted that 'changes in listening patterns are only just beginning to show through and one needs to be cautious about drawing too many conclusions. While it is true that younger listeners are finding new media, the audience for radio remains remarkably robust and local content was never of much interest to younger listeners.'"<sup>7</sup>

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<sup>2</sup> *The Communications Market Report, Nations and Regions: Scotland*, par. 4.1.1.1, page 131, Ofcom, 24 May 2007.

<sup>3</sup> *The Communications Market Report, Nations and Regions: Scotland*, par. 4.1.1.3, page 137, Ofcom, 24 May 2007.

<sup>4</sup> See *The Communications Market Report, Nations and Regions: Scotland*, par. 4.2.2.4, pages 151-152, Ofcom, 24 May 2007.

<sup>5</sup> *The Future of Radio*, par. 6.11, pages 121-122, Ofcom, 17 April 2007.

<sup>6</sup> See <http://www.radioskills.org.uk/training.htm> .

<sup>7</sup> *The Future of Radio*, par. 3.50, page 41, Ofcom, 17 April 2007.