



Radio – Preparing for the Future

Appendix B: Summary of consultation responses

October 2005

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Summary of consultation responses

Introduction

The *Radio - Preparing for the future* phase 1 consultation closed on 7 March 2005. In total, 170 responses were received; 56 were from organisations, and 114 from individuals - a list of respondents is included in the annex. The majority of the organisation responses were from broadcasters among the other respondents were Ofcom's Northern Ireland and Scottish Advisory committees, transmission providers, unions, and trade bodies.

This summary looks at the responses to questions 1 to 7 and 12 to 19. The remaining questions are looked at in the Appendix B to *Radio - Licensing Policy for VHF Band III, Sub-band 3*

Summary of consultation responses

Responses to the phase 1 consultation were broadly positive, with a great deal of consensus between all groups responding – the radio industry, the Trades Unions, Advisory Groups and trade bodies. Respondents largely agreed with the proposals contained in the report, with exceptions as detailed below.

Analogue regulation

The proposals for analogue regulation met with broad approval. In particular, the analogue proposals to make formats the primary tool of regulation, creation of news-hubs, removing automation rules, relaxing the rules on studio location and the revised localness guidance, all broadly met with the approval of the respondents.

However, the proposal to require stations to maintain a Format and Localness file split respondents. Many could see the argument for it, but were worried on a number of grounds:

- Some (including Emap, Capital and GWR) believed it would be onerous to maintain;
- Others argued that it should not be made available at the studios but only online or by post;
- The proposal to include staffing and automation information in the file was objected to as it may cause safety issues if the public could know when a station was going to be empty, or only manned by one person; and
- Others objected purely on policy grounds, i.e. Ofcom should not be interested in regulating inputs

The proposal to require full time journalistic cover for all of the hours which a station's licence says it has to provide local news was objected to by all of the industry respondents, as

- a. It was seen as input rather than output regulation and;
- b. It was considered that it could lead to a sub-optimal allocation of news gathering resources

However, this proposal was supported by the Unions and by Advisory Groups.

Digital Radio

Most operators called for a relaxation of data limits and the abolition of minimum bit-rates, although Emap did not.

However, around 70 individual respondents commented solely on question14 (the proposal on bit rates) and/or digital radio quality more generally. This was also a significant concern in a large number of the balance of responses from individuals. Their general feeling was a preference for quality over quantity and that we should not remove minimum bit-rates. However, all of the broadcasters were in favour of this proposal.

On medium wave the respondents felt that commercial radio should be given preference over community radio and that MW licensing should restart as soon as possible. However they were split as to the speed of MW licensing.

Summary by question

Question 1 – Do you agree with our proposals to use formats as the primary tool of regulation for analogue commercial local radio?

The response to this question was overwhelmingly positive. Respondents saw formats as striking a good balance between flexibility and ensuring that stations provide services that meet the required criteria. In particular respondents liked the ability of formats to be tailored to particular licences.

A number of those who responded positively asked for more clarity about the licence change regime. A separate paper detailing the proposed approach for format changes has been approved by the Radio Licensing Committee and will be presented to the Content Board and Ofcom Board for approval shortly, for publication as part of phase 2 of Radio – Preparing for the future.

Only two organisations dissented from the general proposal. Of these, one (RNIB) wanted the formats to be combined with additional elements (e.g. commitments to community undertakings) and the other (Crown Castle) felt that formats did not focus on “content” enough.

However, a number of those who responded positively asked for more clarity about the licence change regime. While stations wanted the ability to evolve their Formats to cater for changing circumstances and audience needs, there was particular concern that stations awarded licences based upon specialist Formats should not be allowed to become general interest stations catering for a mass audience.

Ofcom’s general view is that the current format regime strikes the balance required to ensure that stations deliver the services that they are required to without being overly burdensome. As a result we do not plan to change the structure of the formats.

In response to the concerns regarding format change we have developed, for consultation, a framework to provide guidance as to how requests for Format changes will be dealt with. This is discussed in more detail in the body of the main document.

Question 2 – How do you think the objective of ensuring the provision on commercial local radio of a high quality news service, including local and national news, is best achieved

Respondents generally supported the idea of commercial local radio being required to produce a high quality local news service (with Capital the notable exception), but did not feel that the regulator should be concerned with how it was produced. As a result, on balance the responses supported the proposal that newshubs should be allowed and opposed the proposals that each station should have “full time professional journalistic cover”. There were a variety of suggestions as to the alternatives that could be used to monitor output.

Should stations be allowed to use news hubs to allow them to operate in the most operationally effective way?

All of the radio broadcasters supported this proposal. The arguments in favour included stronger support in hubs for supervision, training, editorial sources and management. In addition. News hubs were thought to free journalists from studios and to make the best use of the “best” radio voices. In addition many respondents

pointed to the research that Ofcom published showing that listeners did not care where the news was read from.

Amongst those who supported the proposal a number of respondents made the broader point that licensees should be allowed to operate the type of news operation that best suited their market (without regulatory intervention).

There were three organisations which felt that news hubs should not be allowed (BECTU, NUJ and Moss Media). Their concerns were about ensuring that local news was local and in-depth enough and connected to the area.

Ofcom's response is that the regulations on content and formats, combined with the localness guidelines and the accompanying will ensure the quality of local news.

Do you agree that we should include a statement in the localness guidelines to the effect that, in order to provide a comprehensive local news service, each station must provide direct and accountable editorial responsibility, based within the licensed area, for the provision of a news service equivalent at least to full time professional journalist cover for all of the hours during which its licensed format specifies that it will provide local news programmes?

All of the radio broadcasters, with the exception of GMG, opposed this proposal. A frequently made point was that this was not consistent with our goal of output regulation. Many made the point that it would not be in their interest to provide a low quality local news service as it would not serve their listeners who could turn off. A number who opposed the proposal separated local editorial responsibility from journalistic presence. A number pointed out that a number of the activities of a journalist could be done from anywhere as they involved telephoning and other remote communication (e.g. email). A few respondents (e.g. UKRD and Saga), thought it could be difficult to define and regulate a "full time professional journalist". This was reiterated in the responses to question 7 (see summary below). Lincs FM pointed out that it would be an additional financial burden on smaller stations (e.g. where the journalist has more than one job and so is only around for working hours so records the other news bulletins). Capital radio pointed out that while they may wish to keep full time journalists at certain stations, this should be an operational not a regulatory decision.

The supporters of the proposal included Leeds University, NUJ, GMG and UTV. In addition Saga could see this as one option for ensuring resource was available to provide news for a station.

Is there a better way to achieve the objective that focuses more on output rather than input regulation?

There were a number of suggestions that stations should self regulate without expanding on how this could be done. Other suggestions included: listening to output (including monitoring, spot checks and sampling), investigation of complaints, a listeners panel set up for each station to monitor all output, consumer research, listeners perceptions, formats, an audit of all stations.

A few respondents (including Capital) questioned the validity and basis of the objective of high quality news for each station (as opposed to the radio taken as a whole), given that licences do not stipulate the quality of news (only frequency and type). In particular a number quoted the Ofcom research which showed that television and newspapers were a more important source of local news than local radio stations. Some respondents did not answer this part of the question other than to agree that it was inconsistent with output regulation.

In response to the last two questions, we continue to believe that it is the quality of service provided to the listener that matters, rather than how the programme is made. We also believe that listeners are right to expect a local station to collect its news using journalists based in the local area, who are able to be more in-touch with the matters of importance to each area. However, we accept the arguments that to require a professional journalist to be employed locally for all of the hours that a station is required to provide local news is not a sensible requirement. It could actually damage the quality of news in some instances and could lead to significant additional costs for stations, particularly those smaller stations, many of which are not currently in profit.

We confirm, therefore, that groups of stations will be allowed to operate news hubs as they see fit, but we have revised the wording of the proposal regarding the need for full time professional journalists and tried to bring the proposal more into line with our aim of moving from input to output regulation

Question 3 – Should stations be allowed to decide for themselves how much programming they automate

The respondents (including all of the radio broadcasters) were largely supportive of the proposal to allow stations to decide for themselves how much programming to automate. Those in support pointed out that techniques and software allowed automation to be high quality.

There were a few requests for more information as to how Ofcom would test for a reduction in quality. A few of the opposing views wanted Ofcom to move more cautiously e.g. the NUJ wanted automation to be carried out only with Ofcom's permission, Leeds University wanted some, but not total relaxation of the rules and the Radio Studies Network and the Music Business Forum wanted more evidence.

The dissenting voices including the Advisory Committee for Scotland and BECTU. The opposing views often supported some relaxation in automation, but wanted some controls left in place. The Scottish Advisory Committee were concerned that there was no clear, unambiguous way to assess the quality of the output so were concerned at the removal of the input proxy.

On balance, we continue to believe that the current automation rules do not serve the best interest of citizens and consumers. Technology has improved since the rule was imposed and automated programmes can sound just as good as live programmes. A limit on the amount of automation is, therefore, no longer a proxy for the maintenance of quality. However, we do not wish to see all programming being automated, as stations need to be live and local and be able to react to events at the times that matter to listeners, for example at breakfast time. We have tried, therefore, to allow stations flexibility in the way that they produce programmes, while focusing in our guidelines, on the quality of the service the listener hears.

We have taking into account the desire that some controls should be left in place and that there may be no clear, unambiguous way to assess the quality of the output and so reserve the right to reconsider whether specific limits on automation should be reintroduced if the removal of regulation in this area proves to be detrimental to the overall quality of radio services.

In addition we suggested that each station should include, in the proposed Public File, details of how many of its hours are automated and provide Ofcom with information as to when those hours were. Other issues relating to security and the Public File are addressed under question 6 below.

Question 4 – Should the requirement for a station’s studios to be based within the measured coverage area be relaxed to require the station to be based within the licensed area?

The respondents were again largely in favour of the proposal to allow a station’s studio to be located within the licensed area (rather than the MCA). A few (e.g. Chrysalis and Emap) felt that the relaxation would have a minimal practical effect. There was also a desire from many that the requirement be relaxed further either to the Total Survey Area¹ (TSA), or, in some cases, to no restriction at all. Sunrise asked for clarity as to the definition of what constituted “a studio” and “licensed area”.

Those who opposed included BECTU and the NUJ, who urged caution and more consultation before making a decision, and the RNIB. The major concern was that stations could lose touch with their local communities if they were not in the heart of the area.

On balance, having taken into account the consultation responses, we believe that our proposal in phase 1, to change the definition of the local area from the station’s measured coverage area (MCA) to being the “licensed area” was correct, as this strikes a reasonable balance between protecting listeners’ interests and not being overly restrictive.

In response to the concerns that stations could lose touch with the local communities we said we would only consider allowing a station to locate its studios outside its licensed area, for example to co-locate with another station, in exceptional circumstances. However we noted that this may require a Format change to remove any requirement for “locally produced and presented material”, while retaining any requirements for local material.

Question 5 – Do you agree that a station’s local hours, as defined by its format, should include local material, but that, outside of these hours, stations should be free to share material with other stations on a network basis as they see fit?

Most of the respondents focussed on the second half of the question (i.e. about networking) and did not comment on the first part of the question (i.e. about a station’s local hours including local material). The response to the question was broadly positive. In particular the majority of the radio broadcasters were in favour of both aspects of the proposal except as noted below. A number of respondents (e.g. CRCA and Chrysalis) pointed out that the networking question was currently the status quo and that this was not a change.

GWR, the NUJ UTV and one other respondent wanted networking to be restricted to occur only outside daytime or peak times. Those who were opposed to the networking point were concerned about the loss of localness. BECTU and the Music Business Forum wanted Ofcom to monitor the development of networking and to

¹ The TSA is defined for a station by itself for RAJAR purposes and defines the area that RAJAR will sample in order to get listening data for that station

reserve the right to intervene. RNIB wanted networking to be minimal as it did not fulfil key local information functions which their constituents relied on.

Those who commented on the proposals to have local material in all local hours were also broadly supportive, however a number referred to this point negatively in their response to question 7 (see the summary below). CRCA (supported by SRH) objected to this proposal contending that it went beyond the legislative requirement to ensure that the local services contain an appropriate amount of local material.

We accept the arguments against the proposal to require all of the hours of locally made programming to be able to demonstrate elements of local material. We have therefore removed this from the final localness guidelines

Question 6 – Do you agree that each station should be required to maintain a format and localness file, available both at its premises and online, which demonstrates how it is meeting its obligations?

The respondents had a qualified agreement to this proposal. Many respondents seemed to be in agreement with the goals of openness and transparency. In addition the idea of co-and self regulation was seen as attractive (e.g. by CRCA).

A widely shared objection was the inclusion of staffing and automation information on practical and/or policy grounds. The practical objection was focussed around security as radio groups were concerned that if listeners knew that a station either had only one person there, or (if it was automated) was unoccupied there would be a risk to people and belongings. A number suggested that if Ofcom wanted this information it should collect it from the stations and keep it confidentially. The policy objections were around having to provide information about inputs to the process.

Another significant objection (e.g. from UKRD, GWR, and two other respondents) was to the administrative burden that would be placed on stations, in particular small stations, in order to create and maintain the file.

A number of respondents had additional security concerns about making the file available at the premises. Many suggested that the files should be made available online, by post and in addition at public libraries, rather than to visitors at the station.

Three of the large groups objected to the proposal entirely GWR (due to the administrative burden), Capital (due to inclusion of inputs), Emap (due to bureaucracy and security issues).

We have noted that some stations would regard it as a problem if the Public File had to be available for inspection at their offices as well as on their website. We have therefore removed this requirement and instead will require each station to provide, by post, a hard copy of its Public File upon written request by the public.

In response to the other security concerns we have changed the proposal, and will now require licensees to state in their Public File how many hours they are automating in daytime (6am – 7pm), but not which those hours are. In addition, Ofcom will collect information on which hours are being automated throughout the day, directly from stations on a quarterly basis, as part of the quarterly revenue data collection process.

The pre-existence of most of the information allows individuals to navigate to or away from the Public File through simple links and minimises the workload for

licensees. We believe this answers any criticisms that the new system would be onerous for stations.

In response to the concerns on policy grounds, we note that in order to replace input regulation with output regulation, then it will be necessary to find ways to ensure that licensees' output complies with the obligations set out in their formats. Following the consultation and the changes that we have made we feel that the file (combined with investigations and spot checks) is the best way of achieving this change.

Question 7 – Do you agree with our revised localness guidance, which sets out the factors stations should take into account in providing local programming?

While respondents were broadly supportive of the guidance they tended to pick up on specific aspects where they had concerns. A number referred to the comments that they had made in response to earlier questions.

In relation to the provision of local material in each hour of locally produced material, a number of respondents (Capital, CRCA, SRH and two other respondents) expressed concerns. Broadly, their concern was that it would not be an efficient use of resources to ensure that every hour of locally produced material had elements of localness. Rather they wanted to target their resource at specific times during the day.

In addition a number of respondents reiterated their concern around the requirement for a locally-based professional journalist.

Our response to the concerns raised have been addressed above

Question 12 – Do you think the limit on non-programme related data carried on each commercial DAB digital radio multiplex should be raised from the current limit of 20%? If so, what should the limit be raised to? What do you envisage extra capacity would be used for?

On balance the respondents supported an increase in the data limits although a significant number wanted it to be left at 20%. There was no consensus amongst radio broadcasters taken as a whole. There was a general desire from respondents to make sure that the prime purpose of a multiplex remains the provision of radio sound services and this tended to be the major concern for those who opposed increasing the limit.

The respondents who wanted an increase varied in the level that they would increase the limit to from 40% to no limit. A few suggested that the majority (i.e. 51%) be retained for sound broadcasting. Others suggested that as long as the multiplex licence requirements for the number of services and quality levels were met then it should be up the multiplex owner to decide what data they wanted to put on. A few respondents suggested that the limit should be different for national and local multiplexes or that the limit should be decided on a case by case basis

The proposed services were usually unspecified data/multimedia services, although many wanted to ensure that it was audio programme related. Specific suggestions included in car data (e.g. traffic), EPG services and downloading music.

We have taken into account the views on the importance of sound broadcasting services to be carried on this spectrum and we have also noted that, on balance,

there was a desire for the limit to be raised. As a result we will recommend to the Secretary of State that the 20% data limit be replaced by a requirement on UK-wide multiplex operators to reserve capacity for a certain number of radio sound services (Digital One currently broadcasts 8 full-time stereo services and so we suggest that the equivalent of eight full-time stereo services, or a larger number of mono services – mono services require half the capacity of stereo services) should be set aside for sound radio services by all multiplexes.

Question 13 – Do you think the limit on non-programme related data (including radio) carried on each commercial digital terrestrial television multiplex should be raised from the current limit of 10%? If so, what should the limit be raised to?

The respondents had a similar view on increasing data limits in this question as question 12 (i.e. on balance no change) and many made similar arguments. Again there was no consensus amongst radio broadcasters. There were a number who wanted to ensure that TV multiplexes retained TV broadcasting as their primary purpose. A number wanted the data limit for DTT multiplexes to be raised to 20% to bring it into line with the limit on DAB multiplexes.

Both transmission providers (NTL and Crown Castle) suggested that radio could be included as broadcast data i.e. within the 90% already allowed. This would leave 10% available for all other data including radio. It was also pointed out that the BBC digital sound programme services were already classified in this way.

Question 14 – Do you agree with the proposal to abolish the minimum bit-rate limit for DAB digital radio and replace it with a co-regulatory system akin to that applied in television for picture quality?

The organisations which responded to this proposal were broadly in support. In particular the radio broadcasters, except for UKRD, were all in support. The reason for the support was essentially that bit rate, by itself, was a poor proxy for quality. An industry led best practice approach was advocated by the BBC. SRH wanted the current rules removed and nothing put in its place as they saw it as an anomaly compared to AM, FM, DTT and satellite.

There was a desire to know more details of how it would work particularly around how disputes would be resolved, who would pay and the potential burden of providing the evidence that Ofcom was asking for. One respondent wanted Ofcom to produce guidance as to what combinations of technology and codecs may be acceptable.

The organisations who objected were concerned that reduced quality could damage the take up of DAB. This included the academic respondents (e.g. Leeds University and the Radio Studies network)

As noted in the introduction this question raised the largest amount of interest from individual respondents who were almost all opposed to the proposal. Many said that they would prefer increased quality to increased quantity of stations. Both the individuals and the organisations which were opposed to the proposal were concerned at the potential reduction in quality that could result. Many of the individuals equated bit-rate with quality and did not respond to the concept that technical developments could allow the same quality output at lower bit-rates than in the past.

A number of individuals made the point that we should not replace FM with DAB (or switch FM off) until DAB was available at the same quality as FM. A number also made a more general point that DAB quality should be the same as FM quality.

On balance, we do not believe that replacing the current bit-rate limit with a co-regulatory system would lead to a reduction in sound quality from that already provided. Moreover, it would not be in the interests of radio stations to reduce the sound quality as the effect is likely to be that they will lose listeners. We understand the concerns of those who were concerned that this proposal would lead to a reduction in quality and we have said that we will intervene if the outcomes, by general consensus, are not serving the public interest well. However, we also recognise that improvements in technology mean that the existing minimum bit-rate is no longer the most appropriate way to ensure that sound quality is maintained (and we hope) improved

We therefore confirm that we will move to a system of co-regulation, similar to that already applied in television, where it is the sound coming out of the speaker that is judged, rather than the technical inputs.

In response to the questions about the particulars of the proposal we will consult digital multiplex licensees about the details of the co-regulatory regime. We intend that the approach should be industry-led, and should aim to avoid detailed regulatory intervention. An industry-drafted note of guidance on best practice might play a part.

Question 15 – How should Ofcom allocate further MW (AM) frequencies between commercial and community radio?

There was a broad consensus among respondents that commercial radio should be favoured over community radio when allocating this spectrum, but that community radio should be given the spectrum when it would not be commercially viable for a commercial station. However it should be noted that the Community Media Association was the only community radio body to respond and they wanted community radio to be available on all platforms.

There was a strong feeling that commercial licenses should cover large areas (sometimes described as “super regional”) or major metropolitan areas and that the licenses should be advertised after inviting expressions of interest. Some felt that the spectrum should be given to existing FM or MW stations to increase or improve coverage and that power increases should be allowed for MW stations.

Several respondents felt that MW was a good place for community radio, but wanted to ensure neither that MW only had community radio on it, nor that community radio was only available on MW.

A minority of respondents (including GWR and four digital only stations) questioned why MW spectrum was being allocated if Ofcom wished radio to move to digital. NTL and SRH wanted some of the spectrum to be allocated to, or reserved for, DRM.

We have looked at the available frequencies and have concluded that they are not suitable for the large scale licences that were requested by some commercial radio stations. Therefore, given:

- the relatively low level of demand expressed by commercial stations for these frequencies, other than for large area coverage (as discussed above); and
- the possibility of using Medium Wave spectrum to provide a digital migration path for small commercial and community stations

we are not minded to make the licensing of further commercial MW stations a priority for the time being.

However we note the demand for community radio services and we will license the frequencies, where appropriate, for community stations (e.g. where FM frequencies are not available or would be inappropriate). This approach should not hamper the development of DRM services.

Question 16 – How might we accommodate the advertisement of new commercial MW licences into our existing FM licensing plans?

There was a general feeling amongst respondents that MW licensing should get under way soon. However, apart from that, the respondents were split between the three proposals of releasing MW rapidly, waiting until FM licensing was complete to license MW and slotting MW into the existing FM licensing timetable.

A small minority of respondents as in Q15 (i.e. GWR and the same four digital only stations) felt that no more commercial MW licenses should be advertised.

Given our decision not to licence further commercial MW services for the time being no licensing process will be required.

Questions 17-19 – Strategic framework and Public Purposes

17. Do you agree with the proposed strategic framework for the future regulation of radio, which aims:

- To enhance choice, diversity and innovation for consumers at the UK, national, regional, local and community levels.
- To secure citizens' interests through the provision of radio designed to meet public purposes.
- To do this with as little intervention in the market as possible, consistent with meeting our objectives, in a way that is as consistent as possible across media and across platforms.

18. How important do you think it is to develop a set of public purposes for radio and what should those public purposes be?

- Is the set of public purposes already developed for television a useful starting point?
- What else should be added or what should be taken away?
- What is the relative importance of the different elements?
- Are there things that are better delivered by radio than other media?

19. To the extent that it is possible to comment at this stage, how do you think those public purposes are best delivered?

- How important is plurality of provision of the public purposes for radio?
- How much of what commercial radio currently does could be classified as meeting public purposes?
- How well does the current market structure help fulfil public purposes in radio?
- Should the BBC's radio archive be made available more widely to commercial players to provide alternative radio services?

A broad range of answers were received on these questions. In general there was support for the proposed strategic framework. A number of respondents (e.g. BECTU, Music Business Forum and RNIB) raised concerns as to how we could achieve our goals with little intervention in the market.

The idea of public purposes was broadly thought to be useful, although there were some dissenting voices (e.g. Saga). Their concern was that public purposes may create additional burdens on commercial radio, however they felt there was a case for public purposes for BBC radio.

Plurality was generally thought to be important. In addition there was broad consensus that the BBC archive should be made more widely available.

We have described our work on the public purposes of radio in the body of the main document. That section defines the public purposes of radio quite narrowly, in part to address concerns about intervention in the market. Therefore public purposes are defined, as those things which, as a society, we value, but which the market would either not provide at all, or would not provide in sufficient quantity. These are the things which society might want to intervene to ensure the delivery of, either through publicly funded organisations, such as the BBC, or through the requirements on commercial stations or community stations via their licences.

We believe the five public purposes in the Green Paper on the BBC, together with a sixth relating to social gain, can also be applied to radio as a whole and may provide reasons for intervening in the radio market. However we understand the concerns about additional burdens on commercial radio and note that the intention is not to suggest that new obligations should be imposed on existing services, but that existing services already meet some of those public purposes.

Annex - List of non-confidential respondents

abracDABra
Absolute Radio (UK) Ltd
BECTU
BBC
British Entertainment Industry Radio Group (BEIRG)
BT plc
Capital Radio PLC
Centre for Justice and Liberty
Chelmsford Amateur Radio Society
Christian Broadcasting Council
Chrysalis Radio
CN Group
Community Media Association
CRCA
Crown Castle UK Limited
Digital One
DRDB
Emap
Equity
GMG Radio
GWR Group plc
Institute of Communications Studies, University of Leeds.
ISBA
KMFM Group
Lincs FM Group
Moss Media
Music Business Forum
Musicians' Union
MXR Ltd
ntl Broadcast
NUJ
Ofcom Advisory Committee for Scotland
Ofcom Advisory Committee for Northern Ireland
Panjab Radio
Passion for the Planet
PPL
Premier Christian Radio
Radio Studies Network
RNIB
Saga Radio
SRH
Sunrise Radio Group
Tindle Radio Limited
Trades Union Congress
UBC Media
UKRD Group Limited
UTV
WorldSpace
Zeta Digital

Radio – Preparing for the future

Eight wholly confidential responses

114 responses from individuals