

**Public Interest Test Consultation response:
BBC proposals for new music radio stations on DAB+**

Paul Simpson (March 2024)

The BBC's provision of public service music radio, whether existing stations, or proposed new extensions is a huge responsibility. They must have "clear propositions", and deliver against clear public value mission criteria. That is no mean feat, and is about more than building audiences for the BBC as a whole. Indeed, it could be argued that in some instances, a smaller audience may demonstrate success, if it delivers on other indicators.

I will respond to each of the consultation questions in turn, although my focus may broaden, and I will conclude by elaborating on my stakeholder status.

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Question 1:

The proposed stations vary widely in the extent to which they contribute to the BBC's mission to serve all audiences through provision of high quality and distinctive output and services which inform, educate and entertain. It is clear that to do so, they additionally must not replicate, or provide something that the market or commercial sector might already be able to provide (even if they help BBC Radio reach audiences too in direct competition). Sometimes, delivering public value can be a challenge to the listener, and consequently might have a smaller audience than more populist commercial rivals. This should not necessarily be an issue.

- The proposed '**Radio 1 Dance DAB+ Extension**' clearly contributes to the BBC's mission, particularly as it has a younger target audience, and will have a demographic that will inevitably lend itself better to skew towards a C2DE audience. By playing over 3000 unique tracks per year, and with its championing of new music, and new UK talent, it will have a breadth and range just not possible elsewhere on commercial radio. Its support for live events and special recordings will similarly provide support for the UK music/creative industries. By supporting new artists in their life journeys, the station definitely helps to inform and educate, as well as most definitely entertain by showcasing a range of specialist dance and electronic music genres. It must maintain this specialist focus in order to differentiate it from commercial stations playing dance music, for example, promoting experimentation, new sub-genres, and unearthing new music scenes around the UK.
- The proposed '**Radio 1 DAB+ Extension**' does little, I believe, to contribute to the BBC's mission and could end up diluting the 'mother brand'. Although it provides a broader range of tracks than competitors in commercial radio, it will still be playing the same music. While it will go beyond algorithmically generated playlists available on music streaming sites to the target audience of 15-34 year olds by offering authentic human curation, it is still likely that this will be via centralised playlist, rather than through the curation skills of the 'voice of young talent' behind and in front of the mic, trumpeted by the proposal. Even if the young talent do curate the music, the young audience are still totally free to develop, discover and navigate their own playlists on streaming services elsewhere anyway.

The proposal itself, outlining how it will repeat existing Radio 1 programming is a stretch too far. If anything, it should be the other way around. The proposal does nothing to support new music, or create challenging programming that would not be found elsewhere. While it might give new radio presentation talent a national home, Radio 1 already gets significant credit for doing this already, and if the BBC wanted to do more even more, could perhaps be even braver in providing more dedicated live slots to them which are currently filled with airings for pre-recorded podcasts, already available on BBC Sounds. I do not believe this station contributes to furthering the BBC's mission to any significant extent with regard to content, or reaching an underserved audience, despite the targets articulated.

- The proposed '**Radio 2 DAB+ Extension**' does little, I believe, to contribute to the BBC's mission, particularly because to a strong degree, the market already delivers for the audience it is seeking to reach. Again, it is proposing to use content already broadcasting on BBC Radio 2. There is no reason that much of the what is proposed for this station could not be 'elegantly' curated within the existing Radio 2 schedule. The reason that Radio 2 lost many of the listeners this extension targets aged 55+ years old and skewing C2DE is that over recent years, scheduling decisions took it away from providing that very content that served them. These listeners have found new homes. It is wrong to propose a new station that target listeners it has lost to new commercial stations which set up when Radio 2 started to serve them less well, and they (particularly Boom Radio) built services which deliver for them. While 'escape' may be a public service, it is not a particularly strong enough justification for a whole new radio station from the BBC.

The paper states that doing more on Radio 1 and Radio 2 of what the extensions above propose itself risks reducing its public value, disrupting the unique combination/balance of distinctiveness and scale. I disagree. Radio 1 is already incorporating such content, and there is easily scope for Radio 2 to incorporate more of such content. For example, a whole two hours between 17.00-19.00 on Sunday afternoons, between 'Sounds of the 70s' and 'Tony Blackburn's Golden Hour'. When it comes to that balance, distinctiveness should always trump scale.

- The proposed '**Radio 3 DAB+ Extension**' does little, I believe, to contribute to the BBC's mission, and could end up diluting the 'mother brand'. While the proposal states it will play about 8000 tracks a year, I did not get a sense from the paper of how this compares with Radio 3 itself, or commercial Classic FM (and to a lesser extent, Scala Radio). Much of the proposed content is not just the same as Radio 3, it will even be simulcast. I do not see how this is extending anything. The talk of matching moods and routines, rather than concentrating on the source of the content mirrors what the commercial Classic FM is already doing with 'Relaxing Evenings with Zeb Soanes' and 'Calm Classics with Ritula Shah'. Matching provision to audience research saying that people like things that are relaxing and laidback is no way, I believe, to plan to anchor future public service broadcasting provision, although of course it can inform it.

As the document outlined, audiences expect 'clear propositions.' Only one of the proposed extensions (Radio 1 Dance) delivers, while at least two of the others are in danger of diluting the main brands they seek to extend in terms of public value.

Question 2:

In terms of benefit to audiences who will listen to the proposed stations as well as wider social and cultural impacts, I think it is a mixed picture using the quoted BBC/IIPP Mazzucato framework.

- The proposed '**Radio 1 Dance DAB+ Extension**' will clearly be of direct benefit to those that listen, and introduce better to the wider BBC. Its investment in the creative economy by supporting new and live music, and British talent is of significant social and cultural impact. Looking at this through the BBC/IIPP Mazzucato framework, there is individual value, societal value and industry value.
- The proposed '**Radio 1 DAB+ Extension**' is less clear. There is little or no individual value. They are already served by Radio 1, Radio 2, Radio 1 Dance to an extent, and other commercial radio services too. There is little that could be described as genuinely original. There is no societal value. There is some industry value, not with regard to the music industry, but with regard to bringing through new presenting talent supporting the broadcasting industry. However, Radio 1 is already judged to do this well, and could do more if it wished by expanding live on-air slots further.
- The proposed '**Radio 2 DAB+ Extension**' is also less clear. There is individual value, bringing content to an audience group who has judged the BBC to have left them behind. This group have however already found new homes with commercial radio. There is societal benefit in being part of a push to help this older age group to become more tech-savvy, if it helps them discover the joys of BBC Sounds too, as well as 'unlocking' more of the BBC Archive in a similar way to that BBC Radio 6 Music did. The industry impacts are negative, hitting commercial radio groups, particularly small players who have managed to successfully establish themselves, like Boom Radio.
- The proposed '**Radio 3 DAB+ Extension**' is also less clear. There is arguably some individual value as it introduces classical music to a younger and more diverse audience demographic. There is a small amount of societal value in the way in which content 'leans' into mindfulness, wellbeing and sleep space related content, although it could be debated that competitors (and even Radio 3/BBC Sounds themselves, with its uses of such mixes, soundscapes, playlists and 'Slow Radio') do this to an extent already. There is industry value, with 15% of recordings having been released in the last year, and it supporting a diverse range of composers and performers, including those from under-represented groups. There will also be new commissions which will benefit the profession, although it is unclear how much of this could have already have been incorporated within BBC Radio 3.

Question 3:

It is clear that three of the four proposed stations will have an impact on fair and effective competition on commercial radio stations providing music content on radio.

- There is little problem with impact on commercial radio from '**Radio 1 Dance DAB+ Extension**'. There are other commercial dance stations, but the Radio 1 proposition is significantly different, in the same way Radio 1 itself is different from commercial radio.
- There are significant issues when it comes to '**Radio 1 DAB+ Extension**'. It very much feels like an attempt to dilute the Radio 1 offer, and make it more commercially attractive by playing less challenging music. Far too many commercial radio stations are already playing music from the same era.
- There are significant issues when it comes to '**Radio 2 DAB+ Extension**'. Boom Radio as a small operator will be significantly impacted. I know this first-hand as a listener to the station for the last six months. Many years ago, I used to love having a weekly appointment to listen to two shows in particular on BBC Radio 2 – David Jacobs, and Desmond Carrington. Those shows are long gone, but I found that in many of the programmes on Boom, and the diverse nature of its playlist, they have captured both the spirit of 'discovery' and of 'surprise' that I used to find from these champions of eras long since passed. Radio 2 has moved on from such output, and those audiences have now found new commercial homes, especially when combined with other changes. A dedicated 'Extension' would have too much impact on commercial services like Boom Radio (which is only a small-scale operation), and to a lesser extent, Greatest Hits Radio. The main brand of Radio 2 already has shows such as Liza Tarbuck, and the dedicated 'Sounds Of' shows, and it could concentrate on expanding these a little, and incorporating some of the proposed 'Extension' content into the existing Radio 2 network, such as the archive material and sessions, to address some of the challenges it articulates.
- There is a particular issue when it comes to '**Radio 3 DAB+ Extension**'. It feels like an attempt to target Classic FM pure and simple. It too also puts on special content and seasons, and attempts to match output to the audience's moods. It champions 'Rising Stars', tries to educate listeners about the music they are listening to (particularly through the use of charts), and has pioneered interesting work with pets around Halloween and Bonfire Night for example.

Question 4:

The question has been asked as to what steps can be taken to minimise potential negative impacts on fair and effective competition or to promote potential positive impacts. This assumes that the stations are given approval. I would like to widen my comments under this question.

In the section of the consultation document on 'A brief history of music radio', while mention is made of significant consolidation in commercial radio, there is no reference to recent changes to BBC Local Radio, even though this has had some impact on music on BBC Radio. I believe it could have some impact to this consultation, and to reaching underserved audiences, particularly aged 55+ and C2DE. It could be that some of the content which was to be made available via the '**Radio 2 DAB+ Extension**' could instead be made available exclusively via BBC Local Radio? Curated locally, it might provide a way of signposting other parts of the BBC Archive available via BBC Sounds, as well as providing a more coherent sound of public value to an identified target audience. Some content in this style could still be networked.

When it comes to making use of BBC Archive and BBC Sessions, if existing networks are not making use of them, or BBC Sounds, then beyond the scope of this consultation, there may be ways that the Corporation can seek to monetize their worth, being played on commercial networks (or joint ventures), but still signposting their original source, and public value at the time.

When it comes to promoting new stations, it should always be done in terms of that public value, NOT the quickest way to secure headlines or easy publicity or clicks. That will happen inevitably, but to copper-bottom the future status of such stations, they must be able to justify themselves in terms of that public value. Scale is important, but that should not come at the sake of understanding, as the stations will then suffer from never being able to justify their licence fee funding, or whatever form of public funding formula might follow.

The mother iconic brands of BBC Radio 1, BBC Radio 2, BBC Radio 3, etc must never be undermined. There may be an argument for additional radio stations, but that may not always be as 'extensions'. They must be 'clear propositions' as brand, whether link to the genre(s) of music, or other relevant identity.

My stakeholder status:

Back in 1995, and again in 1997-2001 I was first a member of the BBC Radio 1 press and publicity team, and later, the head of PR for BBC Radio 1. I was recruited from a role working for an MP, specifically to help articulate and justify the public value of BBC Radio 1 as it underwent change, at a time when it was under threat of privatisation from legislators. I worked alongside colleagues from other networks so got an understanding of how they defended the public value of their networks, and we prepared to launch new services that were coming down the tracks.

Later as a freelancer, I did communication support for Kiss FM, an independent production company, the Radio Academy and a number of radio talent. I went on to become a Senior Lecturer in Public Relations and Communications at the London College of Communication/University of the Arts, London (where I was course director on the BA Public Relations), and the University of Greenwich. There was a strong focus on audiences, understanding consumers and stakeholder management.

Today, having retired, I am a more voracious radio listener than ever, both to BBC and commercial radio. I am an energetic defender of public service broadcasting from the BBC. [redacted]

I listen a great deal to BBC Radio 3. I find that late night Radio 3 shows like 'Night Tracks', 'Unclassified' and 'Late Junction' embody the essence of public service broadcasting, doing something that commercial radio does not provide, seeking out new and challenging music, as well as reaching audiences where different genres collide, sparking new forms in the process. I listen to a great deal of BBC Radio 4, plus some time on BBC Radio 2. Having been primarily a listener to BBC Radio for decades, in the last five years, I have drifted increasingly to commercial radio stations, including Boom Radio, Classic FM and Times Radio. This has often been driven by the desire to follow trusted BBC talent who the corporation has 'let go', as well as new formats or focus.

I had to retire early on health grounds and moved back to the council estate where I grew up. Most of my neighbours are the same people I grew up alongside, mostly C2DE, and most over 65s. I feel a particular qualitative insight to many of the issues being addressed by this consultation. While the '**Radio 1 DAB+ Dance Extension**' will easily excite and be of interest to a younger C2DE audience, I cannot see any of the other three stations doing the same for younger or older C2DE audiences. Having said that, while the figures on page 10 of the consultation document may reveal an issue with younger 16-34 year old listeners compared to commercial radio (29% share of time spent listening vs 71%), there did not appear to be such an issue when it came to make up of C2DE audience listening anyway (38% for BBC Radio audiences vs 44% for commercial radio).

Any proposals for new DAB+ radio stations must deliver with flair and innovation on getting to air either new, or existing genres or 'scenes' that the market might otherwise struggle to develop or support, or serve audiences commercial radio might struggle to provide for, or understand. As I have argued, I only believe that one of the four proposed new stations/extensions do this. If there are available funds at this moment in time, they should be considered for reinvestment in content to these ends in the existing networks, including music content used in an innovative and clever way on BBC Local radio.

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[contact details redacted]