

## News Broadcasting's response to the BBC Radio 5 Sports Extra: Public Interest Test consultation

### Section 1: Executive summary

- **The BBC is the most significant player in the UK speech radio and podcast market.** Its sports-focused stations - 5 Live and 5 Sports Extra - have a very strong position in the sports radio market. This proposal to extend 5 Sports Extra from a part-time station to a full-time station would further strengthen its position in the market, at a significant cost to competition and plurality.
- **By proposing an extension to BBC 5 Sports Extra, the BBC has effectively proposed launching a new all-day live sports radio station.** As Ofcom has moved away from Operating Licence format restrictions and quotas, there would be no checks and balances to ensure that 5 Sports Extra only broadcast pre-existing podcast content and simulcasts of 5 Live, as it implies it would do in its consultation document.
- **Virtually all of the uplift in listening to 5 Sports Extra would come from the talkSPORT network.** The talkSPORT network is the only direct competitor to the BBC's sports stations, 5 Live and 5 Sports Extra. The risk of cannibalisation to the BBC's other radio services is low, and it is unlikely that on-demand audio listeners would switch to listening to live radio.
- **The BBC's proposal appeals to a significant proportion of talkSPORT listeners and means they would listen less.** Nearly three-quarters (73%) of talkSPORT listeners said they would listen to a relaunched 5 Sports Extra, and nearly a quarter (24%) said they would listen to talkSPORT less as a result.
- **Such a significant loss of listening hours would have a material negative impact on our business.** Based on the BBC's listening estimates, we would expect talkSPORT's revenues to fall by [REDACTED]. This would impact our ability to invest in talkSPORT, our ability to sustain talkSPORT 2 and to invest in our broader audio portfolio, as well as eroding our position in the audio sports rights market.
- **This cost would come without the BBC providing any net additional public value.** The BBC has failed to demonstrate that the proposal would be distinctive and offer additional net public value. It has not provided any qualitative or quantitative evidence as to how it will appeal to the tastes of the target audience. This proposal is very unlikely to help the BBC achieve its objective of better serving younger, C2DE audiences based outside of London.
- **As a result, News Broadcasting strongly opposes the proposed extension of 5 Sports Extra.** The significant negative impact on fair and effective competition

in the sports radio market would be entirely disproportionate to the minimal public value of this proposal. The benefits simply do not outweigh the costs.

- **There is an alternative approach available to the BBC which would help it reach the target audience while avoiding the negative market impacts of this proposal.** The BBC could carry independent UK music, news and sports radio stations on BBC Sounds. This would improve the diversity of the BBC's offer to audiences, while helping the BBC to engage with its target audience. This would also be convenient for audiences; 63% of talkSPORT listeners said they thought the idea of non-BBC stations being available on BBC Sounds was appealing.

## Section 2: Introduction and market context

News Corp UK and Ireland ('**News UK**') is one of the leading media businesses in the UK and Ireland. Our news brands include *The Times*, *The Sunday Times*, *The Sun*, *The Sun on Sunday* and *The TLS*. Our national broadcasting brands include talkSPORT, Talk, Times Radio and Virgin Radio UK, and we have market-leading local stations across Ireland. Our world-famous brands provide news, analysis, opinion and entertainment to almost 40 million people each month. Spanning print and pixel, audio and video, events and experiences, our multi-format brands are home to a plurality of opinion, representing the diverse communities we serve. News UK is wholly owned by News Corp.

We welcome the opportunity to respond to the BBC's Public Interest Test (PIT) consultation on its proposed changes to Radio 5 Sports Extra (5SE). This response first outlines the broader context in which these changes have been proposed, before then answering each of the BBC's consultation questions in turn.

The level of detail provided by the BBC in supporting its proposals has been disappointing, and made it challenging to properly assess and understand the impact of the proposed changes on our business. The BBC's decision to run all of its market research and economic analysis alongside the PIT consultation means that key data points are missing from the PIT, including analysis of the likely impact on competitors. Key pieces of data that the BBC likely does have access to - such as the demographic profile of listeners to its sports podcasts - are missing from the PIT. Throughout our response, we have highlighted areas where it would be helpful for the BBC to provide additional data that it is likely to already have access to. If the BBC does produce new information on its proposals, it is likely that we would want to refresh our analysis to reflect any new information.

To better understand the likely impact of the BBC's proposals and fill in gaps in the BBC's consultation, we commissioned a survey using a sample of 242 talkSPORT network listeners, weighted to reflect the listenership of the talkSPORT network. We have used these results throughout this response, alongside evidence from other sources such as RAJAR.

## **The market context: The evolution of 5 Sports Extra and talkSPORT**

### ***Relaunching 5 Sports Extra as an all-day station would be a significant change from its original purpose, but it is not the first time the BBC has proposed this idea***

In a speech to the RTS Conference in September 2001, DCMS Secretary of State Tessa Jowell announced her decision to allow the BBC to proceed with the launch of several new digital TV and radio services, including 5SE.

*“Five Live Sports Extra is a sensible proposal to use the digital environment to make better use of sports rights already held for broadcast on BBC radio. It will be subject to the condition that it can only be used for these overflow purposes - it must not be used to acquire rights for its own purposes”.*

Tessa Jowell, 13 September 2001<sup>1</sup>

In approving the launch of 5SE, DCMS stated that it is “important that the service is and continues to be, distinctive from competitors and maintains its role as an overflow service from existing BBC radio”.<sup>2</sup> It set two service conditions for the new station:

- 1) *The service will broadcast live sporting events which cannot be accommodated on BBC Radio Five Live. It will not be a full time network.*
- 2) *In particular, the service must be used solely as an overflow for rights that have been obtained for broadcasting on Radio Five Live and Radio 4 Long Wave and must not provide an additional outlet for which the BBC will bid against commercial broadcasters.*

DCMS, Schedule of Decisions, 13 September 2001

Implementing the change to 5SE as proposed would therefore be a significant change from the station’s original purpose. This is not a minor tweak. The station would stop being an extension of 5 Live, and become a live sports radio station in its own right with a distinct brand. But this is not the first time the BBC has proposed this change.

In 2012, the BBC proposed extending the remit of 5SE so it would carry regular daily programming made up of repeats from 5 Live and other BBC stations. The BBC Trust rejected the proposal. At the time, the BBC was in a cost cutting process and the Trust considered the proposal to be inappropriate in that context. In addition, the Trust encouraged the BBC to do more to cover minority sports on 5 Live.<sup>3</sup>

In 2015, the BBC proposed relaunching 5SE as a ‘broader multi-sport channel’ with a 9am to 7pm daytime schedule. It would broadcast magazine shows (e.g. sport chat shows) and highlights and/or repeats of programming carried on BBC Local Radio, BBC stations in the

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<sup>1</sup> BBC News, 13 September 2001, Jowell explains digital decision. Available at: <http://news.bbc.co.uk/1/hi/entertainment/1542898.stm>

<sup>2</sup> DCMS, 13 September 2001, BBC New Digital Services: Schedule of Decisions.

<sup>3</sup> BBC Trust, January 2012, Service Review: BBC Radio 5 live and BBC Radio 5 live Sports Extra. Available at: [https://downloads.bbc.co.uk/bbctrust/assets/files/pdf/our\\_work/r5\\_live/5live\\_5live\\_sports\\_extra.pdf](https://downloads.bbc.co.uk/bbctrust/assets/files/pdf/our_work/r5_live/5live_5live_sports_extra.pdf)

Nations and Regions and the World Service. It included proposals to cover minority sports, including netball, cycling and women's football. It said it would not cover Premier League or international football, international cricket or international rugby.

The Trust decided that the plan would have a material impact on existing commercial radio stations - including talkSPORT - and that it could negatively impact the soon-to-launch talkSPORT 2. The Trust's decision was based in part on advice from Ofcom: "Overall, given the output of 5LSX is proposed to increase by almost 85% and the potential for it to become a sports destination station in its own right with a regular broadcast schedule, there is a risk that the Proposals may have a material impact on talkSPORT and a potentially greater impact on talkSPORT 2".<sup>4</sup>

In 2024, the BBC has returned *again* with a proposal to extend 5SE to a full-time sports radio station with a 6am to 10:30pm schedule. The proposed schedule includes live sports coverage simulcast from 5 Live and podcast content from BBC Sounds and the BBC's Nations and Regions, but makes no commitment to cover a wider range of minority sports. If this proposal could not proceed in 2012 and 2015, there is no new reason why this less distinctive proposal should go ahead now.

This proposal also follows the change to the 5 Live quota in 2023, increasing the proportion of sports programming 5 Live could broadcast from 25% to 30%. That quota change was justified on the basis that the BBC needed to do more to better reach younger, C2DE audiences. Our internal analysis indicates that the BBC has not made use of the quota change, yet is now proposing a further increase to the hours of sports content it can broadcast.

### ***The BBC retains a significant position in the radio market, particularly in the speech radio market***

Listening to all commercial radio stations combined now outstrips listening to BBC radio stations (54.8% to 43.2%).<sup>5</sup> But no single commercial player comes close to the BBC's position in the radio market. The BBC has an even more significant position in the speech radio market; the BBC has a 77% share of listening hours in the speech radio market.<sup>6</sup> The BBC's own Annual Plan notes that:

***"In audio, in a UK market where commercial providers are flourishing, 31.7m adults listen to BBC Radio on average per week – more than any other broadcast radio company or on-demand player. BBC radio stations remain market leaders, with Radio 2 the UK's number one station overall, Radio 4 the number one speech station by some margin and 6 Music the biggest digital-only service."***<sup>7</sup>

<sup>4</sup> Letter from Ofcom to the BBC Trust, 22 July 2015. Available at:

[https://www.ofcom.org.uk/data/assets/pdf\\_file/0027/62973/bbc\\_trust\\_significance\\_test.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0027/62973/bbc_trust_significance_test.pdf)

<sup>5</sup> RAJAR, Q4 2023

<sup>6</sup> RAJAR Q4 2023, 3 month weighting. The BBC speech radio stations included in this analysis are BBC Radio 4, BBC Radio 4 Extra, BBC 5 Live, 5 Sports Extra, BBC Nations Radio and the BBC World Service. The commercial speech radio stations included are TalkRadio, Times Radio, talkSPORT, talkSPORT 2, the LBC network, and GB News radio.

<sup>7</sup> BBC, 28 March 2024, Annual Plan 2024/2025, p. 11. Available at:

<https://www.bbc.co.uk/aboutthebbc/documents/bbc-annual-plan-2024-2025.pdf>

The BBC's strength in the speech radio market - aided by its preferential access to spectrum, the stability of its licence fee income relative to commercial revenues, and the strength of its established brands - provides important context to its efforts to further extend its speech radio footprint. Any change by the BBC to its speech radio portfolio risks having a significant impact on the rest of the market.

***The talkSPORT network continues to grow, but operating a profitable speech radio station is challenging***

talkSPORT evolved from the TalkRadio brand in the early 2000s, as the first national commercial sports radio station. talkSPORT 2 followed in 2016, increasing the amount of live sports and complementary sports programming we could broadcast. talkSPORT and talkSPORT 2, as part of the Wireless Group, were acquired by News Corp in 2016.

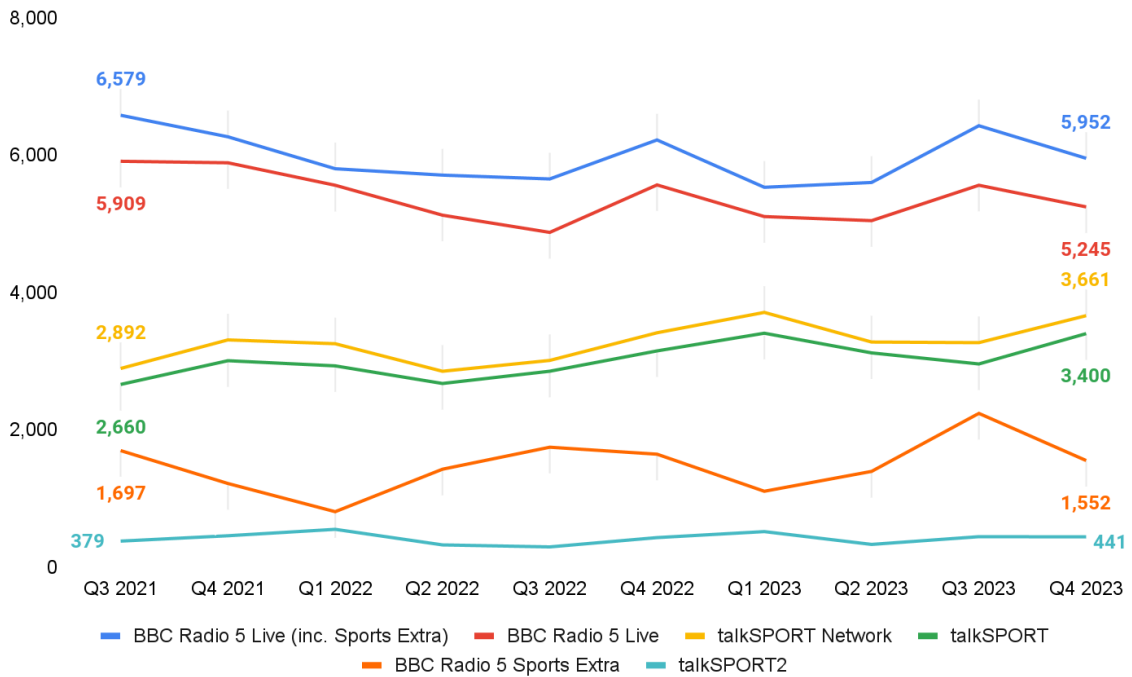
We have grown the talkSPORT network by investing in live sports coverage, our presenters and commentators, and different ways of distributing our content. This includes investing in visualising our content for YouTube and social media, and investing in our portfolio of audio sports rights. Last year, the talkSPORT network broadcast 2,280 hours of live sports coverage. This included men and women's football, rugby union and league, horse racing, golf, cricket and boxing. Earlier this year, talkSPORT broadcast exclusive ad-free coverage of England men's tour of India, and later this year talkSPORT will be the first commercial radio station in the UK to broadcast live coverage of the Olympics.

But operating a profitable commercial speech radio station is difficult. While both talkSPORT and talkSPORT 2 have performed well, they still only have a portion of the listening to 5 Live and 5SE. BBC 5 Live and 5SE enjoy a 3.6% of listening share, compared to the talkSPORT network's 2.1% share.<sup>8</sup> [REDACTED].

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<sup>8</sup> RAJAR, Q4 2023

**Figure 1: Adult 15+ quarterly reach for BBC 5 Live and Sports Extra and the talkSPORT network ('000s)**



Source: RAJAR, Q3 2021 - Q4 2023, 3 months weighting.

In order to overcome the challenges of growing and maintaining a profitable commercial speech radio business, we operate all of our News Broadcasting radio stations as a network. This allows us to more effectively leverage brand assets and control costs. We operate a unified app, allowing listeners to easily switch between our stations, and utilise our Talent and content across all of our stations. For example, talkSPORT presenters and commentators regularly appear on Times Radio to discuss the biggest sports stories of the day, and we will use our rights to the Olympics across our stations in the UK and Ireland.

This means that while the change proposed by the BBC would directly impact talkSPORT network revenues, given our operational model, it would have a broader impact on our ability to invest across all of our audio brands.

### Section 3: Responses to consultation questions

**Question 1:** What do you think about the potential public value of our proposals for extending the number of originated hours for 5 Sports Extra, including the extent to which our proposal contributes to the BBC’s mission to serve all audience through the provision of high quality and distinctive output and services which informs, educates and entertains?

The BBC has failed to demonstrate that its proposal for 5SE offers any additional net public value. It has failed to produce any quantitative evidence to support its value for money claims, or any qualitative or quantitative evidence to support its claims that it will help it better reach its target audience. It has made no commitments about the proportion of minority sports or hours of Nations and Regions content it will broadcast. The proposal is not distinctive, nor does it offer any clear public benefit.

Below, we respond to each of the points that make-up the BBC’s public value hypothesis in turn.

**1) *“Improve value for money for linear radio audiences, by making more of our brilliant on-demand sports content discoverable on network radio”***

The BBC has failed to demonstrate how this proposal improves value for money for licence fee payers. As a starting point, the BBC has not provided any figures to support this claim. We would welcome the BBC quantifying how this proposal improves value for money for licence fee payers.

The podcast content that the BBC proposes broadcasting on an extended 5SE is already available and easily accessible on BBC Sounds. BBC Sounds is not a minnow in the UK audio market; it is the top platform for online radio listening and second most popular platform for podcast listening in the UK.<sup>9</sup> And podcast content performs well on Sounds; 40% of all listening on Sounds in 22/23 was to on-demand speech content.<sup>10</sup>

Spending £250,000 per year on extending a DAB radio station and populating it with podcast content - which is more naturally accessed on an on-demand basis on BBC Sounds - does not offer improved value for money for licence fee payers. This is at odds with the BBC’s recently announced strategy “to create a digital-first BBC that can deliver all our purposes in a fast-changing media landscape by connecting everyone to unmissable content, making the BBC online the best place to watch, listen and use the BBC”.<sup>11</sup>

<sup>9</sup> Ofcom, 16 April 2024, Audio Listening in the UK. Available at: [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0036/282798/Ofcom-Audio-Report.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0036/282798/Ofcom-Audio-Report.pdf)

<sup>10</sup> BBC, Group Annual Report 2022/23, p. 45.

<sup>11</sup> BBC, 28 March 2023, Annual Plan 2024/2025, p. 13.

The BBC has framed this proposal as being “highly cost effective”.<sup>12</sup> BBC 5SE’s £3 million content budget and the £250,000 required to hire four extra staff may be just a fraction of the BBC’s overall £524 million budget for radio.<sup>13</sup> But it is a significant figure compared to commercial stations such as talkSPORT and talkSPORT 2.

It is also likely to be an understatement of the actual costs. These budget figures do not reflect the BBC’s ability to rely on its privileged infrastructure and network access to distribute this station to a mass audience at low cost. While the BBC may say it has no plans to increase 5SE’s content budget, that is likely because it could account for any new sports podcasts commissioned to fill the 5SE schedule under BBC Sounds’ budget.

It is impossible to know how much the BBC spends on podcast content for BBC Sounds, because the BBC does not disclose a disaggregated budget for BBC Sounds in its Annual Plan or its Annual Report. While it discloses its spend on ‘Radio’ and ‘Online’ services, it is unclear where spend on BBC Sounds podcasts that would also go out on 5SE would be accounted for.

## **2) “Improve the value currently underserved C2DE and younger audiences are receiving from the BBC”**

We know that Ofcom has encouraged the BBC to improve its relationship with younger audiences in lower socio-economic groups, specifically DE audiences.<sup>14</sup> But this proposal will not help the BBC to better reach younger, C2DE audiences outside of London because it fails to fully reflect their listening habits and the content that appeals to them. Instead, it is likely that this proposal would end up super-serving the BBC’s most loyal audience of ABC1 listeners in London and the South East.

Fundamentally, we question why the BBC considers putting podcast content in a schedule on a live DAB radio service will appeal to its target audience. Long-term listening trends indicate that while live radio remains popular, younger audiences are much more likely to listen to on-demand audio than older audiences.<sup>15</sup> Research also illustrates that podcast listeners are more likely to be younger, in higher socio-economic groups and live in the South of England.<sup>16</sup>

The BBC has not provided any quantitative or qualitative evidence to demonstrate that this specific proposal appeals to its target audience. Instead, it has provided limited data illustrating that sports content on Radio 5 Live over-indexes with 25-34s and C2DEs, and 5SE over-indexes with 25-34s. Neither station over-indexes with audiences outside of London.

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<sup>12</sup> BBC, Radio 5 Sports Extra: Public Interest Test consultation, p. 11.

<sup>13</sup> BBC, 28 March 2023, Annual Plan 2024/2025, p. 45.

<sup>14</sup> Ofcom, 30 November 2023. Annual Report on the BBC 2022-23, p. 4. Available at: [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0027/272349/sixth-bbc-annual-report-23.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0027/272349/sixth-bbc-annual-report-23.pdf)

<sup>15</sup> Ofcom, 3 August 2023, Media Nations, pp. 55 - 57.

<sup>16</sup> Ofcom, 16 April 2024, Audio Listening in the UK, p. 8.

But the BBC is very likely to have data on the demographic profile of listeners to its sports podcasts on BBC Sounds. It should know from this data whether its sports podcasts - specifically the podcasts it lists in its consultation - over index with younger, C2DE audiences outside of London. This data would be a strong indicator of whether this proposition would appeal to the target audience, but the BBC has not included that data in its consultation.

Our own research looked at the demographic appeal of the station among talkSPORT network listeners. While younger audiences were more likely to say that they would listen to a revised 5SE than older audiences, neither C2DEs nor those outside London or the South East were significantly more likely to say they would listen to the proposed 5SE. When we asked respondents whether they would be likely to change their listening to talkSPORT if the proposed 5SE launched, C2DE audiences were much less likely to say they would listen to talkSPORT less. Just 11% of C2DE respondents said they would listen less. This means that rather than losing C2DE listeners to a revised 5SE, we would be losing ABC1 listeners.

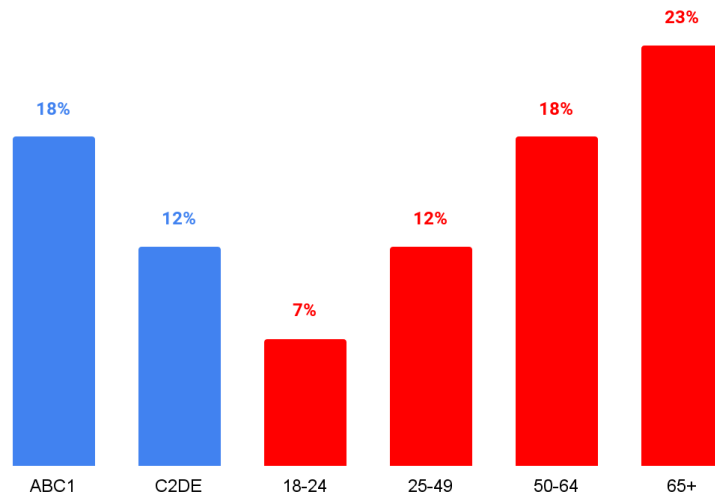
**Figure 2: Appeal of an extended 5 Sports Extra, by socio-economic group, age and location**

	Total	C2DE	18-34s	Outside of London and South East
Likely to listen to new station	73%	75%	83%	74%

Source: ResearchBods survey for News Broadcasting. N = 242, UK sample of talkSPORT and talkSPORT 2 listeners. Q B5: How likely, if at all, would you be to listen to this revised BBC 5 Sports Extra radio station?

Looking specifically at the content the BBC has proposed broadcasting on the station, there is no indication that the BBC has given serious thought to how it will appeal to its target audience. One of the sample schedules provided shows the station turning into a single sport station for five days during the mens' Ashes Test series. But cricket is not a sport that over-indexes with younger, C2DE audiences. If the BBC is serious about appealing to the target demographic, this has not been demonstrated in the type of content it proposes broadcasting.

**Figure 3: Cricket fans, split by socio-economic group and age**



Source: [YouGov](#), 6 September 2021, Question: Which, if any, of the following sports do you follow e.g. watching games on TV or live and/or supporting a particular team?

### 3) **“Improve the discovery of on-demand sports content on BBC Sounds through prominence on network radio”**

It is difficult to understand why the BBC considers that discovery of the sports podcasts already available on BBC Sounds need to be boosted by being made available on a national radio station, given both the strength of BBC Sounds and the BBC’s position in the sports podcast market.

In its consultation, the BBC states that: “An extended 5 Sports Extra on DAB will provide an easily accessible audio stream of sport content on **an already established and widely accessible medium**, offering content that appeals to these audiences”. BBC Sounds is an already established and widely accessible medium. Sounds is available on over 20,000 types of devices<sup>17</sup> and has an average of five million accounts listening weekly.<sup>18</sup> This growth since its launch in 2018 is all aided by the unlimited cross-promotion the BBC can give to Sounds.

In addition, the sports podcast market is very competitive, with a huge range of choice available to audiences. A plural range of players across the UK’s media market produce sports podcasts, include radio and TV broadcasters (e.g. the BBC, talkSPORT, Sky Sports, Global), news publishers (e.g. The Guardian, The Athletic), independent production companies (e.g. Goalhanger Productions, Off The Ball), and small fan-led podcasters (e.g. *Arseblog*, *The Anfield Wrap*).

The BBC has a relatively strong position in the sports podcast market, particularly compared to talkSPORT. While the BBC publishes very limited data on its podcast listenership, we do know that the BBC had a record 226 million plays to BBC Sounds

<sup>17</sup> BBC, June 2023, [Group Annual Reports and Accounts 2022/23](#), p. 136.

<sup>18</sup> BBC, 28 March 2024, Annual Plan 2024/2025, p. 11.

on-demand radio and podcast content in Q3 2023, with one 5 Live podcast - *Sport's Strangest Crimes* - in the top ten most played podcasts. Across third-party platforms, there were 226 million global downloads of BBC podcasts in Q3 2023, with three 5 Live podcasts in the top twenty downloaded: *Football Daily*, *Test Match Special* and *Rugby World Daily*.<sup>19</sup> In the absence of any other available data, we can only assume that the BBC's most popular sports podcasts are downloaded millions of times each week across BBC Sounds and third-party platforms.

Rather than improving public value, this proposal would grow audiences for BBC podcasts by leveraging the BBC's dominance in speech radio. It would push audiences to BBC Sounds, a walled garden which no other broadcaster can access, and the BBC would seek to retain listeners in that walled garden. This would have a detrimental impact on the sports podcast market in the UK, which would only be heightened if the BBC proceeds with its plans to carry advertising on its audio content on third-party platforms.<sup>20</sup>

**4) “Represent and serve audiences from across the UK by highlighting sport content and voices from the Nations and Regions and provide a linear platform for new talent”**

The launch of a revised 5SE cannot be justified on the basis that Nations and Regions audiences would be better served by this station. The BBC has not proposed investing any additional funds in new Nations and Regions-specific content under this proposal. It has not committed to broadcasting a fixed number of hours of Nations and Regions podcast content on 5SE, nor has it committed to broadcasting the list of Nations and Regions podcasts included in the consultation document.

The three sample schedules provided indicate that the extended 5SE would feature relatively little Nations and Regions-specific content. The first sample schedule features a Wednesday to Sunday of Ashes coverage with no Nations or Regions podcasts included.

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<sup>19</sup> BBC, BBC Sounds Quarter 3 2023. Available at: <https://www.bbc.co.uk/mediacentre/documents/bbc-sounds-q3-2023.pdf>

<sup>20</sup> The Times, 18 March 2024, BBC radio to feature adverts in UK for the first time. Available at: <https://www.thetimes.co.uk/article/bbc-adverts-tv-ads-programmes-uk-channel-commercials-rvsjd2vgg>

Figure 4: The first sample schedule provided by the BBC

	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
06:00	Additional hours for podcast content	Additional hours for podcast content	Additional hours for podcast content	Additional hours for podcast content	Additional hours for podcast content
07:00	Event adjacent podcast content	Event adjacent podcast content	Event adjacent podcast content	Event adjacent podcast content	Event adjacent podcast content
08:00	Test Match Special Podcast: The Big Ashes Preview Part 1	Additional hours for podcast content	Additional hours for podcast content	Additional hours for podcast content	Additional hours for podcast content
09:00	Test Match Special Podcast: The Big Ashes Preview Part 2	Podcast: Ashes Highlight – Day 1	Podcast: Ashes Highlight – Day 2	Podcast: Ashes Highlight – Day 3	Podcast: Ashes Highlight – Day 4
09:30		Test Match Special Podcast Day 1	Test Match Special Podcast Day 2	Podcast: Test Match Special Podcast Day 3	Test Match Special Podcast Day 4
10:00 – 18:30	<b>TEST MATCH SPECIAL</b> THE ASHES: ENGLAND v AUSTRALIA DAY 1	<b>TEST MATCH SPECIAL</b> THE ASHES: ENGLAND v AUSTRALIA DAY 2	<b>TEST MATCH SPECIAL</b> THE ASHES: ENGLAND v AUSTRALIA DAY 3	<b>TEST MATCH SPECIAL</b> THE ASHES: ENGLAND v AUSTRALIA DAY 4	<b>TEST MATCH SPECIAL</b> THE ASHES: ENGLAND v AUSTRALIA DAY 5
19:00 – 22:30	5 Live Sport Simulcast	5 Live Sport Simulcast	5 Live Sport Simulcast	5 Live Sport Simulcast	5 Live Sport Simulcast
22:30 – 06:00	OFF AIR	OFF AIR	OFF AIR	OFF AIR	OFF AIR

Source: BBC Radio 5 Sports Extra: Public Interest Test consultation, page 14.

The second shows a day with live sport in the morning and evening. It includes no Regions podcasts and only 2 hours of Nations podcasts, half of which is *Scottish Football Daily*. Scottish football is not a niche or undercovered sport, and playing the same podcast twice (at 6:30am and 6pm) is not distinctive.

Figure 5: The second sample schedule provided by the BBC

Example schedule of 5 Sports Extra for a day with no live sport			
06:00	The 5 Live Football Daily	18:30	Podcast Premiere (repeat)
06:30	Scottish Football Daily	19:00 – 20:00	5 Live Sport Simulcast
07:00 – 14:30	Live Sport: Tennis: Australian Open	20:00 – 22:30	Live Sport: Premier League: Chelsea v Arsenal
14:30	Sport Entertainment Podcast 1		
15:00	Sport Entertainment Podcast 2		
15:30	5 Live Podcast 3		
16:00	5 Live Podcast 4		
16:30	Nations Podcast 1		
17:00	Nations Podcast 2	22:30 – 06:00	OFF AIR
17:30	The 5 Live Football Daily		
18:00	Scottish Football Daily		

Source: BBC Radio 5 Sports Extra: Public Interest Test consultation, page 14.

The third shows a day with no live sport. The schedule includes two hours of unnamed Nations and Regions podcasts. *Scottish Football Daily* would be played three times across the day (at 6:30am, 8:30am and 5:30pm), which presumably means the BBC plans to repeat the same podcast three times in one day. As above, a high number of repeats is not distinctive. In 2023, there were only 30 days where 5SE did not broadcast any live sport, which means this is the maximum number of Nations and Regions podcasts the BBC would likely play and it is likely to happen very rarely (8% of the calendar year).

**Figure 6: The third sample schedule provided by the BBC**

Example schedule of 5 Sports Extra for a day with no live sport			
06:00	The 5 Live Football Daily	13:00	Podcast Premiere (repeat)
06:30	Scottish Football Daily	13:30	Podcast Premiere (repeat)
07:00	Podcast Premiere	14:00	Sport Entertainment Podcast 1
07:30	Podcast Premiere	14:30	Sport Entertainment Podcast 2
08:00	The 5 Live Football Daily	15:00	5 Live Podcast 3
08:30	Scottish Football Daily	15:30	5 Live Podcast 4
09:00	5 Live Podcast 1	16:00	Sport Podcast 1
09:30	5 Live Podcast 2	16:30	Sport Podcast 2
10:00	Narrative Podcast 1	17:00	5 Live Football Daily
10:30	Narrative Podcast 2	17:30	Scottish Football Daily
11:00	Nations Podcast 1	18:00	Narrative Podcast 3
11:30	Nations Podcast 2	18:30	Narrative Podcast 4
12:00	Regional Podcast 1	19:00 - 22:30	5 Live Sport Simulcast
12:30	Regional Podcast 2	22:30 - 06:00	OFF AIR

Source: BBC Radio 5 Sports Extra: Public Interest Test consultation, page 15.

If the BBC did want to build audiences to Nations and Regions sports podcasts, it would surely be more impactful to broadcast these podcasts on its regional and local radio stations, if it does not already do so, rather than extending 5SE. The content would be more directly relevant to its audience on these platforms, while the podcasts would also likely complement the BBC’s existing live coverage of sport of interest to local audiences (e.g. Scrum V could complement BBC Radio Wales live coverage of rugby).

**5) “Broaden the range of sports being represented on BBC linear audio services, particularly those that currently receive less broadcast coverage”**

There is no evidence in the PIT consultation that 5SE would cover a wider range of sports than is currently covered on BBC Radio.

The BBC proposes that an extended 5SE will “provide coverage of a broad range of sports including men and women’s football, rugby (union and league), cricket and boxing...”. These sports are all extensively covered by the BBC and commercial

broadcasters. The BBC has not included any commitment to dedicate a certain proportion of its hours to covering minority sports.

The BBC already covers men and women's football, rugby union and league, cricket and boxing extensively across 5 Live and 5SE. We would welcome the BBC providing data on the extent to which it already covers these sports across 5 Live and 5SE to understand why it considers these sports to be undercovered. In particular, we struggle to see how the BBC considers men's football, cricket and boxing to be sports that require better representation on BBC Radio, unless it specifically plans to cover only the lower tiers of these sports, such as amateur boxing.

The BBC's sample schedules do not indicate that it intends to use an extended 5SE to showcase a wide range of undercovered or minority sports. For example, Figure 6 in the BBC's PIT document indicates that it would turn the station into a single-sport station to focus on the men's Ashes Test matches, and as we have set out above, the schedule indicates that there will be minimal coverage of sports from the Nations and Regions.

The BBC could do so much more to use its existing high-reaching platforms to cover the diverse range of sports played that receive less media coverage. This could include disability and accessibility sports, sports played by women, or sports that only tend to be covered during the summer Olympics.

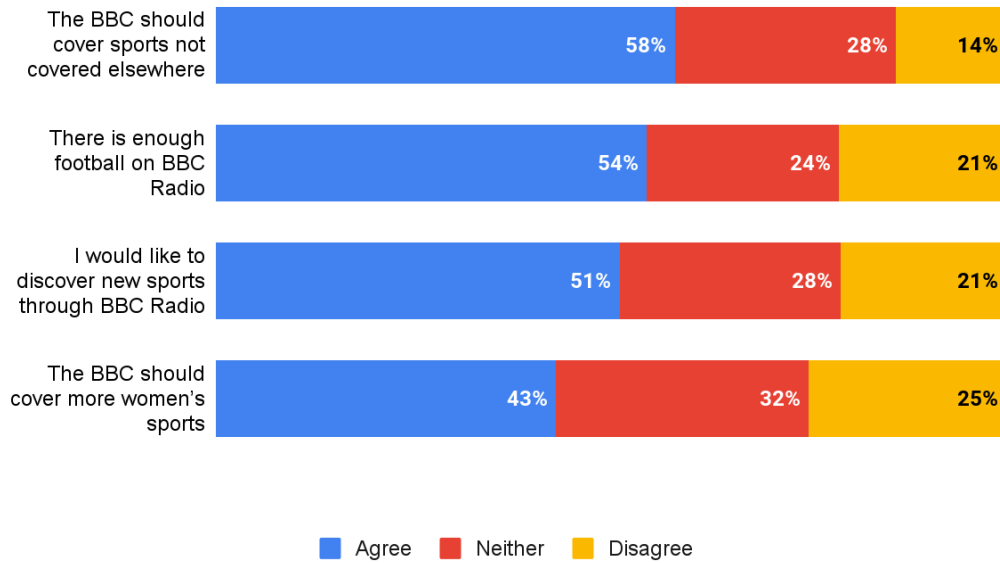
At talkSPORT, we try to showcase a wide-range of sports to give more to our audiences. For example, our schedule includes the *Women's Football Show* on talkSPORT 2 and coverage of women's rugby league. [REDACTED].

But this is the role the BBC - as a PSB with a remit to serve all audiences with distinctive content in exchange for secure licence fee funding - can play. It could do so much more within the existing scope and schedule for 5 Live and 5SE to provide a home on UK radio for undercovered and minority sports.

There is audience demand for the BBC to play that role. In response to our survey, over half of respondents (58%) agreed that the BBC should cover sports not covered elsewhere, and 51% said they would like to discover new sports through BBC Radio. More than half of respondents think there is enough football coverage on BBC Radio, and a significant minority think the BBC has a distinct role to play in covering more women's sports.

Respondents aged 18-34 were more likely to think that the BBC should cover sports not covered elsewhere (70%), cover more women's sports (61%), and that there's enough football on BBC radio (64%). They were significantly more likely than average to say they would like to discover new sports through BBC Radio (83%).

**Figure 7: Views on the BBC Radio’s role in covering a wide range of sports**

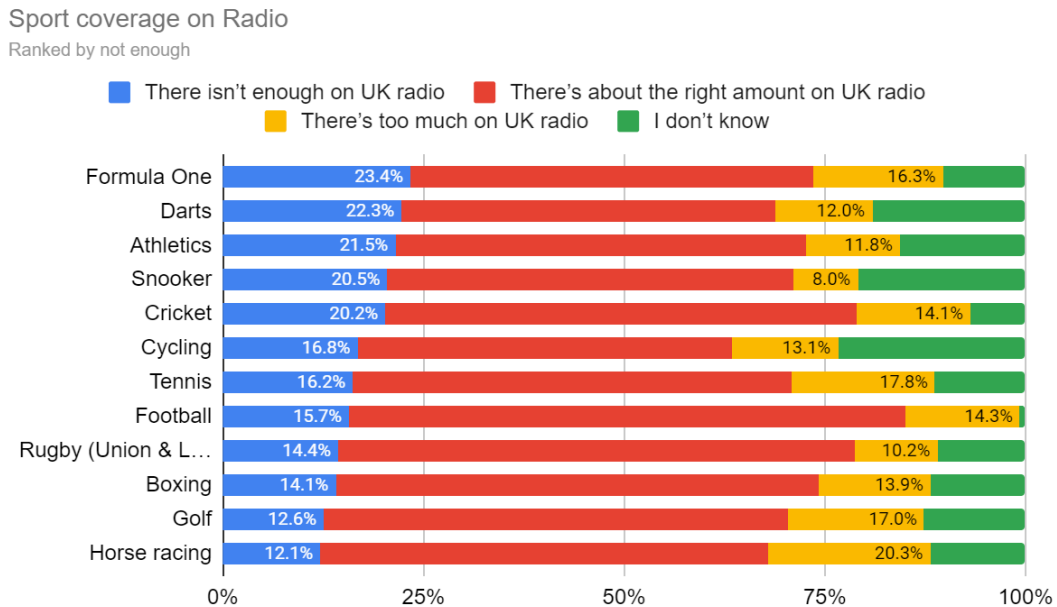


Source: ResearchBods survey for News Broadcasting. N = 242, UK sample of talkSPORT network listeners. Question B3: Thinking specifically about BBC Radio 5 Live / 5 Sports Extra, to what extent do you agree or disagree with the following statements?

We also asked our survey respondents to consider the level of coverage certain sports receive on UK radio. None of the sports the BBC has proposed covering on an extended 5SE (football, rugby, cricket and boxing) came in the top three that respondents considered uncovered. Just 16% of respondents considered that football is undercovered.

There were some differences among the BBC’s target demographics. Just 6% of 18-34s think football is undercovered, while a significant proportion consider that tennis (25%) and athletics (30%) are undercovered. A third of C2DE audiences (33%) think that snooker is undercovered.

**Figure 8: Views on level of coverage of different sports on UK radio**



Source: ResearchBods survey for News Broadcasting. N = 242, UK sample of talkSPORT network listeners. Question B2B: Do you think UK radio stations cover these sports enough, too little or about the right amount?

To conclude, the BBC has failed to provide evidence that extending 5SE would offer any net additional public value.

- **Value for money:** Putting BBC Sounds podcast content on DAB radio would not improve value for money for licence fee payers. The proposed budget is not an insignificant amount of money, and there is a lack of transparency around where any newly commissioned sports podcast content would be accounted for.
- **Improving satisfaction with underserved audiences:** The proposal is poorly designed to appeal to the BBC's target audience, evidenced by the fact that content in the BBC's sample schedules is unlikely to appeal to the target audience. While our research findings indicate that the proposed station may appeal to younger audiences, there is little evidence that the station would over index with C2DE audiences or those outside of London. It would do little to improve the BBC's satisfaction ratings with DE audiences, as Ofcom has encouraged it to do.
- **Improving discovery of BBC podcasts on Sounds:** The BBC already has a very strong position in the sports podcasting market. Coupled with the BBC's proposal to carry advertising on podcasts on third-party platforms, this proposal risks growing listeners to BBC Sounds at a significant cost to the wider sports podcasting market.
- **Nations and Regions audiences:** The proposal would not improve value for audiences in the Nations and Regions, given that the BBC has made no commitment

about the proportion of Nations and Regions content it would broadcast on the station and the sample schedules indicate that proportion would be very low.

- **Broader range of sport on BBC radio:** The range of sports the BBC has proposed covering is very limited. The BBC could instead use its existing hours of sports coverage on 5 Live and 5 Sports Extra to showcase sports not well-covered elsewhere in the market. Audiences would clearly welcome the BBC playing this role.

**Question 2:** What do you think about the benefit to audiences who will listen to the station, as well as wider potential social and cultural impacts?

As we have set out in detail in response to Question One, this proposition does not offer additional net audience benefit.

It is unlikely to offer improved benefit to individual listeners and licence fee payers because it merely replicates what is already available in the commercial radio market, and the content the BBC proposes populating the schedule with is more naturally accessed on BBC Sounds.

An extended 5SE is likely to have minimal broader social and cultural impacts because it is likely to end up superserving the BBC's most loyal audience of ABC1 listeners, and the Nations and Regions offer is very limited. The range of sports the BBC plans to focus on is not distinctive, and would not help audiences to discover new sports.

The BBC makes the case in its PIT that this change will have a broader benefit to audiences and industry because it would aid the shift of radio audiences from analogue and DAB to online. While we do want to see audiences migrate to online radio listening over time, migration plans should be made in partnership with industry. This proposition also reduces the ability for the BBC to collaborate with other broadcasters on DAB coverage buildout and capacity sharing. As noted above, simulcasting is an inefficient use of spectrum, as is broadcasting podcast content which could easily be accessed on BBC Sounds. In contrast, the incremental net public value that would be created by the BBC licensing its spare DAB capacity to third party radio operators is quantifiable, and material.

**Question 3:** What impact (positive or negative) do you think our proposal for a full-time 5 Sports Extra might have on fair and effective competition on commercial radio stations providing sports content on radio?

This proposal would undoubtedly have a negative impact on the talkSPORT network, and therefore fair and effective competition on the sports radio market. Proceeding with this proposal would significantly damage the BBC's only commercial rival in the sports radio market, without the BBC offering any additional public value. The potential costs of this proposal are completely disproportionate to the potential benefits. The BBC should not proceed with the proposal to extend 5SE.

***A fundamental concern is that this proposal allows 5 Sports Extra to broadcast as a live sports radio station***

The lack of clarity around the scope of the BBC's plans leaves us very concerned about how far this proposal could be pushed. This proposal could effectively allow 5SE to operate as a live sports radio station, rather than a station broadcasting some genuinely pre-recorded podcast material and some live sports programming simulcast from 5 Live.

For example, the line between 'podcasts' and 'live broadcasting' could become very blurred. Ofcom's own recent Audio Report acknowledges that there is "no agreed definition of a podcast".<sup>21</sup> Is a 'live podcast' that is recorded on air on BBC 5SE and then goes up on BBC Sounds later considered a podcast or a live radio broadcast? Would it be allowed in the bounds of these proposals? The BBC also hasn't defined what it means by 'live sports coverage'. Does it include hours of pre-match build-up, for example, or presenters chatting in between horse races or rounds in a boxing match? We have concerns about how far 'coverage' could be pushed beyond the actual live commentary of a ninety minute football game, for example.

There is no guarantee that the relevant sports podcasts will always premier on BBC Sounds, before then being broadcast on 5SE. The sample schedules provided by the BBC indicate that some podcasts could premier on 5SE, rather than on BBC Sounds; figure 8 in the BBC's consultation includes two slots for a "Podcast Premiere".

While the BBC states that it is "not commissioning new live programmes, rather it is making use of the BBC's existing sports catalogue", the BBC has not guaranteed that the list of podcasts named in its consultation would be those broadcast on the proposed new station.<sup>22</sup> It seems likely that the BBC would commission new podcast content specifically for its new 5SE service.

We question how old the podcasts that the BBC plans to put around its live sports commentary would be (e.g. its "event adjacent podcast content" around the Ashes in its first sample schedule). If the BBC plans to broadcast these podcasts each day around a sporting event like the Ashes, they are likely to be as-live or near-live, rather than being recycled from the BBC's "existing sports catalogue" or archive.

We are also concerned about how far the simulcasting aspect of the BBC's proposals could be pushed, allowing 5SE to effectively operate as a full-time live sports radio station. The BBC's proposals around simulcasting would be a significant change to the remit of 5SE. At present, 5SE only carries coverage of live sport. The BBC has proposed that 5SE will "simulcast 5 Live's sport programming" from 7pm each evening. To be clear, this is not live sports coverage (e.g. commentary of a football match), but simply live sports programming (e.g. sports chat shows).

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<sup>21</sup> Ofcom, 16 April 2024, Audio listening in the UK, p. 8. Available at: [https://www.ofcom.org.uk/data/assets/pdf\\_file/0036/282798/Ofcom-Audio-Report.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0036/282798/Ofcom-Audio-Report.pdf)

<sup>22</sup> BBC, 14 February 2024, Radio 5 Sports Extra: Public Interest Test consultation, p. 13.

In the short term, this would allow the BBC to run 'spoiler' programming during slots where talkSPORT has the exclusive audio rights. The BBC currently does this with its *Monday Night Club* programme, where it provides updates on Premier League games which talkSPORT has the exclusive rights to.

Over time, simulcasting could lead to format slippage, allowing the BBC to build up 5SE as a full-time sports channel, while 5 Live increasingly focuses on news and current affairs coverage. This kind of incremental change to the BBC's services is not unprecedented. The BBC is now pursuing incremental changes to BBC Radio One Dance, having first launched the service as an online-only stream with no new or exclusive content.

We also note that as a principle, simulcasting delivers very little public value and is an inefficient use of spectrum, as it duplicates programming across two networks with identical broadcast transmission coverage.

Because Ofcom has moved away from holding the BBC to clear service licences and programming commitments under the Operating Licence, ultimately the BBC could not be held to what it has said it would do in this consultation document. There is currently no way to guarantee that the 5SE will not broadcast as a live sports radio station under these proposals.

### ***The proposed 5 Sports Extra would replicate talkSPORT's offer to audiences***

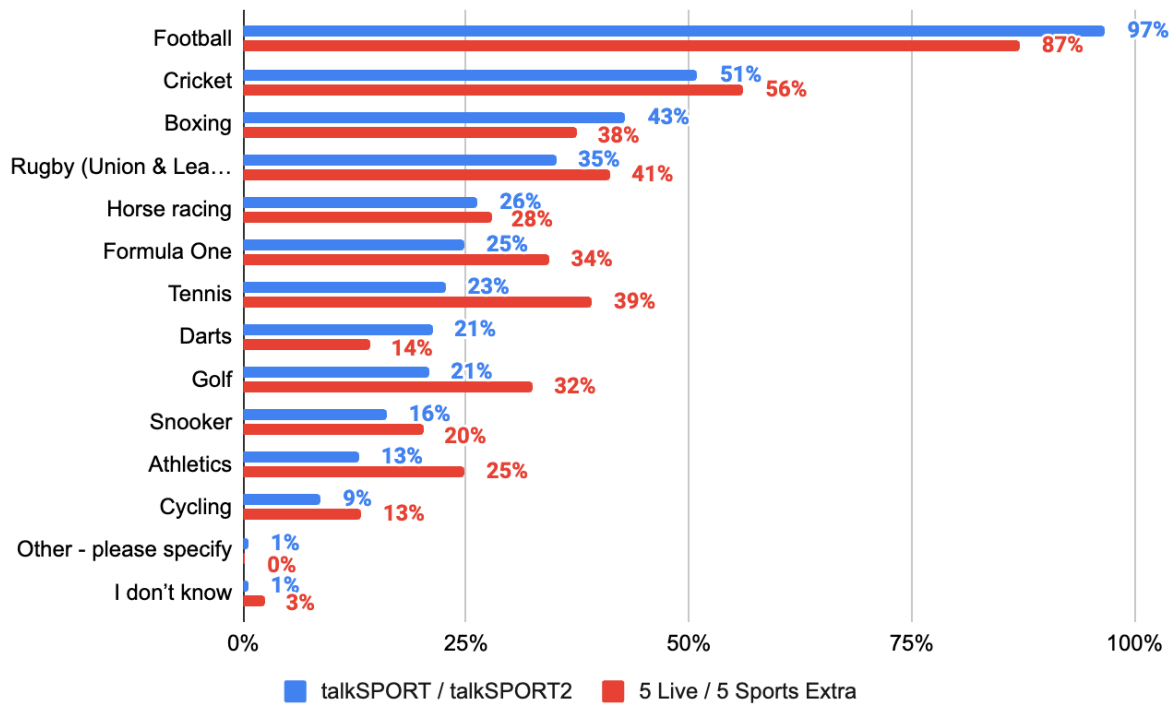
The BBC's proposal replicates much of what talkSPORT offers audiences, specifically in terms of the type of content it proposes broadcasting and the mainstream sports it intends to focus on. Our audiences associate talkSPORT with entertaining sports-related chat, similar to the BBC's sports podcast content, and live sports commentary. Nearly four in ten (39%) talkSPORT listeners said the proposed 5SE sounds similar to what they already hear on the talkSPORT network.

But we are particularly concerned about the risk that the BBC uses this proposal to broadcast more live sports coverage. The BBC already broadcasts a significant amount of live sports on 5SE; on average 2,900 hours of live sports per year, compared to the 2,280 hours across the talkSPORT network in 2023. Simulcasting from 5 Live would only increase this number. This is before considering the ways in which the rest of 5SE's schedule could bleed into live sports coverage.

Live sports coverage is crucial in driving listening to talkSPORT. [REDACTED].

Results from our market research below indicates that audiences associate a very small number of sports - football, boxing and darts - with the talkSPORT network over the BBC's stations. It is therefore deeply concerning that the BBC's proposals focus on the small number of mainstream sports that drive mass listening to sports radio. If the BBC proceeds with an extension to 5SE that does focus on a narrow range of mainstream sports - specifically football, cricket and boxing - it would erode the position that talkSPORT has built up in the market as the home of entertaining sports chat and coverage of key sports.

**Figure 9: Sports associated with the talkSPORT network and BBC 5 Live and 5 Sports Extra**



Source: ResearchBods survey for News Broadcasting. N = 242, UK sample of talkSPORT and talkSPORT 2 listeners. Q B2: Thinking about the following radio stations, which, if any, of the following sports do you associate with each? Please select all that apply.

As we have set out above, we are also concerned by the opportunity simulcasting offers the BBC to erode our exclusive coverage and distinctive offer to audiences. talkSPORT currently owns the rights to weeknight Premier League matches. [REDACTED]. During that slot on a Monday evening, BBC 5 Live broadcasts the *Monday Night Club*, offering football “discussion and debate”. While ostensibly the show looks back on the weekend’s football, it also offers live updates during Monday evening’s fixtures which the BBC does not have the rights to (e.g. interrupting programming to notify listeners that X has just scored against Y). This show is a spoiler, trying to discourage listeners from seeking out talkSPORT’s exclusive live coverage by providing updates on 5 Live. Putting this kind of content on 5SE too encourages more listeners to stay on BBC services. In this way, the BBC fails to provide distinctive programming while eroding the advantage that talkSPORT has in being the rights holder to those games.

If 5SE carries live sport programming every evening in the form of a simulcast from 5SE, the advantage that talkSPORT has in being a live radio station and rightsholder will be eroded. There would be nothing to stop BBC 5 Live and 5SE carrying content that directly competes with talkSPORT’s coverage every weekday evening by running football discussion shows that carry score-flash updates.

***The proposed 5 Sports Extra appeals to talkSPORT’s audience, and would mean a significant proportion listen to talkSPORT less***

We tested the appeal of the BBC's proposal with our audience to understand likely switching behaviour. The results were deeply concerning.

When given information about the potential changes to 5SE and asked how likely, if at all, they would be to listen to a revised 5SE radio station, 73% of talkSPORT listeners said they would be quite likely or very likely to listen. Just 10% of respondents said they would be unlikely to listen to the proposed BBC 5SE.

Key reasons for listening included that longer accessibility times would make it easier for listeners to find time to tune in, and that sports fans find the thought of even more sport content being available appealing.

*"The more sports the better"*

*"Longer accessibility times will make it easier for me to find time to tune in"*

*"I enjoy sports coverage so this could rival Talksport"*

A quarter (24%) of respondents said they would listen less to talkSPORT or talkSPORT 2 less if the proposed 5SE launched. Those who said they would listen less sighted reasons such as time constraints, the fact that Sport Extra does not carry advertising, the reputation of the BBC and the new content available.

*"I wouldn't have time to listen to both"*

*"5 Live Sports Extra would be offering a similar experience without the ads"*

*"BBC don't have adverts so if there's a head to head over programming, BBC will win"*

### ***The change to 5 Sports Extra would have a material impact on talkSPORT's audience and revenues***

There is a finite pool of potential listeners to live sports radio, a pool which is under pressure due to structural trends in linear radio consumption. This change is extremely unlikely to grow the market for sports radio listening in the UK. Any uplift in listening to an extended 5SE is likely to come from other live radio stations, primarily talkSPORT. It is unlikely to cannibalise the BBC's other services, because it does not offer any other sports radio services, and podcast listeners are unlikely to switch from on-demand listening to live radio listening. There already is an overlap in listeners between the talkSPORT network and the BBC's sports stations; [REDACTED].<sup>23</sup> The BBC acknowledges the likely narrow impact in its consultation: "We do not anticipate any measurable impact on non-sports commercial radio or online services".<sup>24</sup>

Without any detailed quantitative market research on which to base it on, the BBC's initial estimate for the incremental weekly audience that its proposals will generate is 800,000. The BBC expects this audience will listen on average for 3.6 hours a week, delivering incremental weekly listening hours of 2.7 million, according to the BBC's mathematics.

[REDACTED]

<sup>23</sup> RAJAR, Q4 2023, 3 month weighting

<sup>24</sup> BBC, 14 February 2024, Radio 5 Sports Extra: Public Interest Test consultation, p. 16.

As we operate on a network basis, any change to talkSPORT revenues impacts our ability to invest in our speech radio network more broadly. While the BBC may be positioning this proposal as a relatively small change to 5 Sport Extra's schedule, this would have ramifications for the future of our whole radio business.

An additional factor not reflected in any market research or modelling is the likely impact of the BBC's unrivalled ability to promote an extended 5SE across its platforms. The £150,000 budget earmarked for marketing a relaunched 5SE is significant, and likely does not include the BBC's valuable ability to cross-promote its services.

In 2018, Radiocentre calculated the value of the cross-promotion of BBC Sounds across the BBC's radio and TV services. At the time, it estimated the value of that campaign at £7.53 million across just one week, with most of that value being derived from cross-promotion on BBC Radio services (£6.35 million in that week).<sup>25</sup> While those figures are now likely out of date, they provide an indication of the value of cross-promotion. There is nothing stopping the BBC applying the same approach to a relaunched Sports Extra, and the value and impact of a promotional campaign across BBC platforms should not be underestimated.

***This change would have ramifications for competition elsewhere in the supply chain, in particular the audio sports rights market and competition in podcast listening***

This change would have longer-term indirect impacts on talkSPORT listening and revenues. [REDACTED].

While the BBC does commit to not increasing its audio sports rights budget or hours of live sports coverage, that commitment offers very little reassurance. It is effectively negated by the BBC's final sentence below.

*"These proposals do not involve any increase to either the BBC's audio sports rights budget or hours of live sports coverage. The proposal for 5 Sports Extra to be a full-time station relates to using sports programming not reliant on additional sports rights, i.e. podcasts, replays and 5 Live simulcasts.*

*However, it is important to note that the BBC will continue to engage with the market to ensure that it is able to provide audiences with great live sports coverage."*

BBC Radio 5 Sports Extra PIT consultation, p. 12

This means the BBC would have the scope to bid for new audio sports rights, it has the incentive to do so and in the context of its overall budget it could afford to do so with a relatively trivial redistribution of resources. Ultimately, there is no commitment that any of this language around sports rights would go into the Operating Licence, so there would be no binding obligations on the BBC.

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<sup>25</sup> Radiocentre, November 2020, Submission to Ofcom's Call for Evidence on the Market Position of BBC Sounds, p. 21. Available at: [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0020/216371/radiocentre.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0020/216371/radiocentre.pdf)

The BBC’s strategy to push audiences from an open environment to a closed environment will also have long-term implications for the market. The BBC clearly has a strategy to drive audiences from a platform where listeners can easily switch between stations from different providers (e.g. DAB) to a platform where content is only available from a sole provider (e.g. BBC Sounds).<sup>26</sup> This proposal to put BBC Sounds podcast content on a radio station is part of that strategy. It is a shame that rather than boosting the UK’s radio sector as a whole through partnerships, the BBC has invested heavily in developing its own streaming platform and driving audiences to it with little regard for the rest of the market. The growth of BBC Sounds as a “walled garden” for BBC content will come at a cost to the rest of the UK’s radio market.

**Question 4:** Are there any steps you think we could take to minimise any potential negative effects on fair and effective competition or to promote potential positive impacts?

There is a very clear alternative available to the BBC that would allow it to meet the objectives of this proposal without inflicting the negative impact on fair and effective competition that this proposal presents.

Instead of extending Sport Extra’s schedule, the BBC could partner with independent music, news and sports radio stations to distribute those stations on BBC platforms, including on BBC Sounds. For example, it could carry the talkSPORT network live radio streams and podcasts on BBC Sounds. While we note that some radio broadcast groups might not be interested in partnering with the BBC, it would be particularly beneficial to smaller stations, digital-only stations and potential new entrants to the market.

This would benefit the BBC in several ways. Firstly, it would help the BBC better reach and serve the target audience of this proposal: younger, C2DE audiences based outside of London and the South East. The talkSPORT network has a more balanced audience profile than 5 Live and 5SE, and so we attract more of the audience that the BBC wants to target.

**Figure 10: Reach to the talkSPORT network and 5 Live and 5 Sports Extra, based on demographics**

	talkSPORT	talkSPORT 2	5 Live	5 Sports Extra
C2DE	44%	46%	34%	35%
15-34s	31%	23%	14%	17%
Outside London and the South East	76%	71%	76%	70%
Combined: 15-34s C2DEs located outside of London and the South East	<b>11%</b>	<b>8%</b>	<b>4%</b>	<b>2%</b>

<sup>26</sup> With the exception being that BBC does carry a small number of podcasts from third-party providers on BBC Sounds, including The Times’ podcast *The Story*.

*Source: RAJAR, Q4 2023, Adults 15+, 3 months weighting. Analysis of audience location based on BBC Regions.*

Secondly, it would help the BBC to meet its requirement under the Charter to “work collaboratively and seek to enter into partnerships with other organisations” including commercial organisations in the TV, radio and online sector.<sup>27</sup> From talkSPORT’s perspective, given the scale of BBC Sounds in the audio market, it would help us to reach a bigger audience.

It would also help the BBC to drive the take-up of online listening and support the journey towards AM switch-off, without damaging commercial radio broadcasters. At present, talkSPORT’s DAB coverage is poorer than the BBC’s, given the commercial constraints in operating the same number of transmitters as the BBC. Carrying the talkSPORT network on Sounds would mitigate the shortfall in DAB coverage that talkSPORT and talkSPORT 2 are subject to compared to the BBC, and mitigate the loss in coverage we would expect if we switched-off AM distribution.

This kind of partnership would ultimately benefit audiences too. It means that audiences could access a more diverse range of content and access all of that content in one place. It would mean that BBC listeners would be getting more value from the licence fee, and it’s something that we know audiences would be supportive of. Nearly two-thirds (63%) of respondents to our survey thought that the idea of non-BBC stations being available on BBC Sounds was appealing. This was particularly appealing to younger audiences; 78% of 18-35s liked the idea.

We therefore encourage the BBC to opt for partnership, which would benefit the BBC, talkSPORT and audiences, rather than the option which would ultimately have a negative material impact on its only commercial competitor in the sports radio market. We would welcome conversations with the BBC on this alternative.

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30 April 2024

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<sup>27</sup> Royal Charter for the BBC, December 2016, Section 13. Available at: [https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964\\_CM\\_9365\\_Charter\\_Accessible.pdf](https://assets.publishing.service.gov.uk/media/5a80c6d740f0b6230269570c/57964_CM_9365_Charter_Accessible.pdf)