Radio 5 Sports Extra : Public Interest Test consultation

BBC consultation document

Publication date: 14 February 2024

Closing date: 27 March 2024

Table of Contents

1. Executive summary 2

1.1 The BBC's proposals for 5 Sports Extra 2

1.2 The public value of these changes 2

1.3 Regulatory approval process 3

2. The context for our proposals 5

2.1 BBC sports audio 5

2.2 The development of 5 Sports Extra 5

2.3 Commercial sports radio in the UK 6

2.4 Importance of live sport 9

3. The BBC's proposals for 5 Sports Extra 11

3.1 Target audience 11

3.2 Budget 11

3.3 Editorial proposition 12

3.4 Distribution 15

3.5 Estimated reach and share of listening 15

4. Providing public value 17

4.1 Delivering against the BBC's Mission 17

4.2 Our Public Value Framework 17

4.3 Our public value hypothesis 18

4.4 Planned research 20

5. Further details on the consultation 22

5.1 The Public Interest Test process 22

5.2 The BBC's consultation questions 24

5.3 How to respond 25

1. Executive summary

1.1 The BBC's proposals for 5 Sports Extra

This document sets out the BBC's proposals to extend the broadcasting hours of BBC Radio 5 Sports Extra, complementing our existing live sports coverage with BBC sports podcasts and replays from across the UK, as well as broadening the range of sports content represented on national radio.

Currently 5 Sports Extra is a part-time extension to BBC Radio 5 Live, which only offers an average of 56 hours per week of live sports coverage. Under the new proposals, 5 Sports Extra will become a full-time station, broadcasting from 6am up to 10.30pm. The station's main remit will remain live sport, but as part of these plans, the station would also broadcast sports-related podcasts or non-live commentary replays in the gaps between live sporting events.

Given the rapid expansion of choice across radio and podcasts in recent years (alongside the general expansion of digital content available across all media), audiences now expect channels and services with clear propositions to aid discovery – making 5 Sports Extra a full time station on DAB helps provide a more reliable, easily accessible audio stream of sport content on an already established and widely accessible medium. A consistent listening schedule will help audiences on DAB discover a wide range of BBC sport podcasts currently only available on BBC Sounds, and encourage the transition of listeners to BBC Sounds where they can discover other relevant BBC content, with a richer, more personalised experience.

The podcasts would cover a wide range of sports including men and women's football, rugby (union and league), cricket and boxing as well as sports entertainment and documentary type podcasts such as *Sports Strangest Crimes, Scrum V Rugby from BBC Wales, Tailenders, Scottish Football Podcast* and *Football Daily*. This will include sporting stories and voices from across the UK, as well as broadening the range of sports content represented on national radio. It also enables us to appeal to new audiences by broadcasting sport podcasts which appeal to them between live sport events - replacing the generic loop which is currently broadcast.

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.

In this document, we set out the market context, the detail of our proposal, including initial estimates of take-up, and how this proposal will generate public value. We invite responses from all interested stakeholders, particularly regarding the public value and market impact of the proposals.

1.2 The public value of these changes

We consider that extending the hours of 5 Sports Extra will provide audiences with a destination dedicated to BBC audio sports content, including the existing live coverage

of a wide range of sports plus a showcase for audiences to discover the full breadth of the BBC's on-demand sports content from across the UK.

As such the proposals will contribute to the BBC's commitment to better provide high quality programming for audiences, supplementing the existing sports offer with a wider variety of content. We are also committing to providing better representation in our sports coverage by highlighting sport content and voices from the nations and regions, enabling us to better reflect, represent and serve the diverse communities of all the United Kingdom's nations and regions.

By extending the hours of 5 Sports Extra and turning it in to a full time station, we consider that the station will:

- Improve value for money for linear radio audiences, by making more of our brilliant on-demand sports content discoverable on network radio;
- Improve the value currently underserved C2DE and younger audiences are receiving from the BBC;
- Improve discovery of on-demand sports content on BBC Sounds through prominence on network radio;
- Reflect, 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; and
- Broaden the range of sports being represented on BBC linear audio services, particularly those that currently receive less broadcast coverage.

1.3 Regulatory approval process

The Framework Agreement states that the BBC can only make a material change to UK Public Services once the BBC has carried out a Public Interest Test, has determined the Test is satisfied and Ofcom has approved the change. A material change is defined as either a "new UK Public Service" or "any change to a UK Public Service which may have a significant adverse impact on fair and effective competition".[1]

As the only other significant sports radio organisation in the UK, it is likely that the potential impact of our proposals for 5 Sports Extra would fall mainly on talkSPORT. As such, we consider that our proposals require the full scrutiny of the Public Interest Test process and Ofcom's competition assessment process. We set out our initial view on increased listening and market impact in section 3.5 below.

As part of this process, we are publicly consulting on these proposals to give stakeholders an opportunity to comment. We invite responses from all interested stakeholders, particularly regarding the public value and market impact of the proposals. This consultation runs for six weeks from 14 February to 27 March. Meanwhile, we will undertake further analysis to assess both the public value and market impact of these proposals. This consultation fulfils requirements of Ofcom's new requirements.

[1] BBC Framework Agreement, clause 7(6) and 7(7).

We will determine our final proposals on the basis of this research, analysis and stakeholder feedback. If the BBC Board decides that these proposals meet the Public Interest Test, we will then send the Public Interest Test submission and supporting evidence to Ofcom. At this point, we will publish the Public Interest Test submission, research and analysis. We expect this to be in the summer of 2024.

2. The context for our proposals

In this section, we lay out the service offered by 5 Sports Extra, in particular the various sports content available on the platform, and a timeline of 5 Sports Extra development since its launch.

2.1 BBC sports audio

The BBC began live sports coverage shortly after its first charter was awarded on 1 January 1927. The first live sports commentary was of the England v Wales RFU match at Twickenham on 15 January 1927. A week later the BBC broadcast the first live football match, a 1-1 draw between Arsenal and Sheffield United at Highbury. The same year saw the BBC provide its first radio coverage of the Oxford-Cambridge boat race, cricket (Essex v New Zealand) and the Wimbledon tennis championships.

Sport remains an essential part of the BBC's programming across all its services. As the cost of video rights for sports has increased and more and more live sport is available only on subscription TV services, the BBC's audio services play an increasingly important role in live sports coverage. Currently the BBC delivers its sports audio content across its services, including:

- Radio 5 live broadcasts 24-hours a day, seven days per week providing continuous news and live sports coverage, with at least 70% of its broadcast hours comprising news and current affairs;[2]
- 5 Sports Extra provides live coverage of sporting events, but no non-live or non-sport programming;
- BBC Radio Scotland, BBC Radio nan Gàidheal, BBC Radio Wales, BBC Radio Cymru, BBC Radio Ulster / Foyle, and English Local Radio provide sports coverage and discussion of sports in their respective coverage areas;
- BBC Sounds can be used to listen to any network radio sport[3], and is also host to a broad range of BBC-commissioned sport podcasts and acquisitions for a variety of different sports, with content made by BBC teams across England, Wales, Scotland and NI, featuring voices and sporting stories that represent audiences across the UK; and
- Audio commentary and content via the BBC Sports app.

2.2 The development of 5 Sports Extra

5 Sports Extra was launched in February 2002 as an extension of Radio 5 Live, providing additional live coverage of sporting events.

The launch was part of the BBC's expansion into digital[4] and complemented the sports coverage on the BBC which at the time was included as part of Radio 5 Live's mix of news and sport, Radio 4 and across BBC Local Radio stations. The station sought to provide listeners with a greater choice of live sports coverage, as well as deliver increased value

[2] Having been reduced from 75% in 2022 as part of Ofcom's review of the Operating Licence.
[3] The sports rights for Nations and Local Radio stations are typically limited to their broadcast
[4] The BBC also launched the following DAB stations in 2002: BBC Radio 1Xtra, BBC 6 Music, BBC Radio 7 (later renamed Radio 4 Extra) and BBC Radio Asian Network.

for licence fee payers from the portfolio of sports rights already held by the BBC, by offering alternative coverage to that provided on other UK-wide BBC services.

Due to the part-time nature of the station, there is no consistent schedule, though on average during this Charter period, 5 Sports Extra has broadcast about 2,900 hours of live sports coverage per year, i.e. about 56 hours per week or 8 hours per day. Broadcast hours vary greatly throughout the year, for example, during the summer there may be a period of coverage which has the station broadcasting up to 24 hours a day; in contrast during the winter months, there could be some days where the station is not broadcasting any live sport at all. The coverage plan is dependent on the sport schedule and the rights the BBC holds, which often changes year-by-year depending on the sport calendar.

The station broadcasts sports that are not typically covered on Radio 5 Live, such as more extensive coverage of Test Match Cricket, Wimbledon, Formula 1 motor racing as well as the Women's Super League. As noted above it does not currently provide any additional sport programming content outside of live coverage. The broadcasts themselves are live and uninterrupted except for any updates given by commentators to listeners on Radio 5 Live (delivered to 5 Sports Extra listeners via simulcast). The station does not broadcast non-live content. All content on 5 Sports Extra is commentary of live sports events, except short build up to an event, or content during breaks in play. Currently, in the absence of live sport coverage, 5 Sports Extra broadcasts a one-minute loop, trailing the sport the BBC covers on the station.

The majority of sport coverage on 5 Live and 5 Sports Extra is produced by BBC Sport, with a single team, based in Salford, serving both stations. Only one member of staff is dedicated full-time to the management of 5 Sports Extra. The remainder of the live coverage (and podcast activity) on the stations are produced by the independent sector.

2.3 Commercial sports radio in the UK

Competition in sports audio is spread across TV (through companies such as Sky and its sport discussion programmes and podcasts), on-demand from talent-led indies like Goalhanger (*The Rest is Football*), through print media organisations such as The Guardian (*Football Weekly*), The Times (*The Ruck Rugby Podcast*) and the Daily Mail (*It's All Kicking Off*) and finally, on radio through commercial sports radio stations talkSPORT and talkSPORT 2.

As this proposal is regarding a change to a BBC public service radio station, the primary market impact will be on similar sports commercial radio stations in the UK. As noted, there is only one commercial provider of linear sports radio in the UK, News UK Broadcasting Ltd (News Broadcasting), which operates talkSPORT and talkSPORT 2.[5] For this reason, we will be focussing our analysis on the impact on talkSPORT and talkSPORT 2, with additional consideration for the wider sport radio market in our full analysis.

[5] News UK acquired what was then called Wireless Group in 2016. It was previously owned by UTV.

In January 2000, talkSPORT was launched as the UK's first commercial sports radio station. Initially talkSPORT broadcast about 40 hours per week of non-sports content; however, since 2012, it broadcasts sporting discussions and commentary 24 hours per day, i.e. 8,760 hours per year.

In March 2016, talkSPORT 2 was launched on DAB. It is a 24 hours per day sports news and live sports station. In 2020, talkSPORT 2 was switched from DAB Mono to DAB+ to make room for Times Radio.

talkSPORT and talkSPORT 2's current offer is a mix between live sport and live presenter-led programmes and standalone content. The non-live sport programmes are typically live debate style shows, podcast talk shows or documentaries. A significant driver of listener reach for sports radio stations in the market is live sport. On talkSPORT and talkSPORT 2, there is a mix of live coverage of cricket, boxing, motorsport, American football (NFL) and English football (EFL, FA and Premier League), as well as European football (Champions League, Europa League and Europa Conference League).

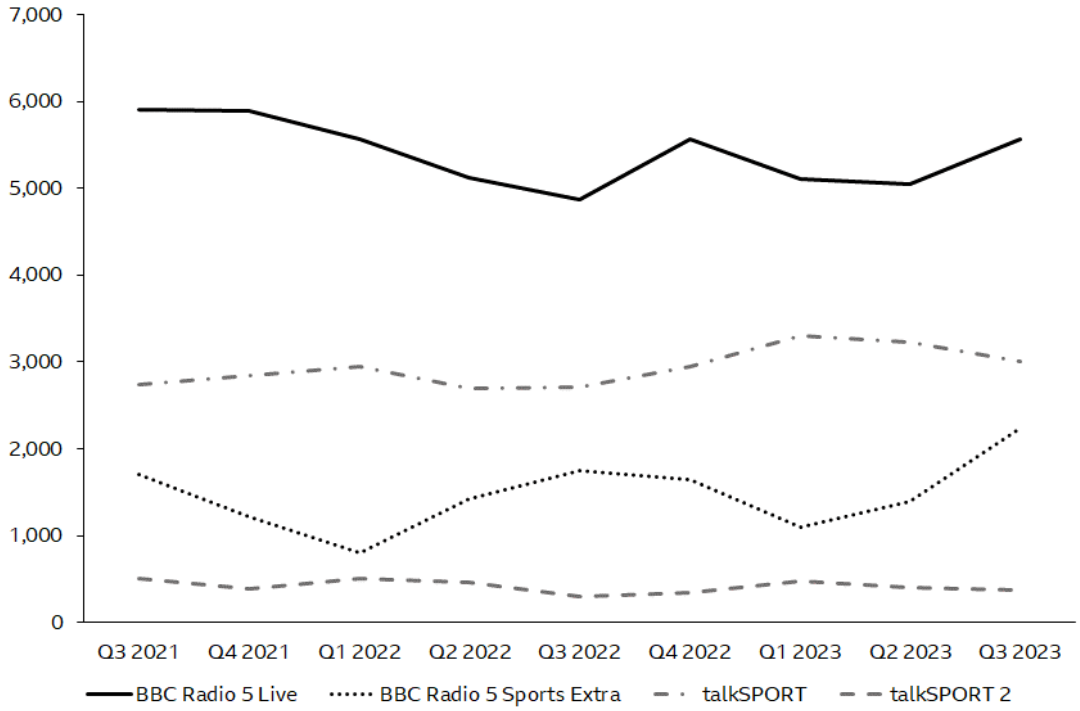
Figure 1: Summary of 5 Sport Extra and competitors – Q3 2023

Name	Broadcast Area	Broadcast Hours pa	Distribution	Reach Population (m)	Share (%)
5 Live	National	8,760	MW, DAB, Sounds, online apps, smart speakers and TVs	5.56	3%
5 Sports Extra	National	2,900	DAB, Sounds, online apps, smart speakers and TVs	2.24	1.1%
talkSPORT	National	8,760	MW, DAB, talkSport app, online Smart speakers and TVs	3.01	2%
talkSPORT 2	National	8,760	DAB+, talkSport app, online smart speakers and TVs	0.38	0.1%

Source: RAJAR Q3 2023

Over the last two years (between Q3 2021 and Q3 2023) talkSPORT and talkSPORT 2 have been performing well in the market with listening reach increasing by 5% across both stations, in comparison, reach to 5 Live and 5 Sport Extra has increased 3% over the same period. See further detail in the breakdown below.

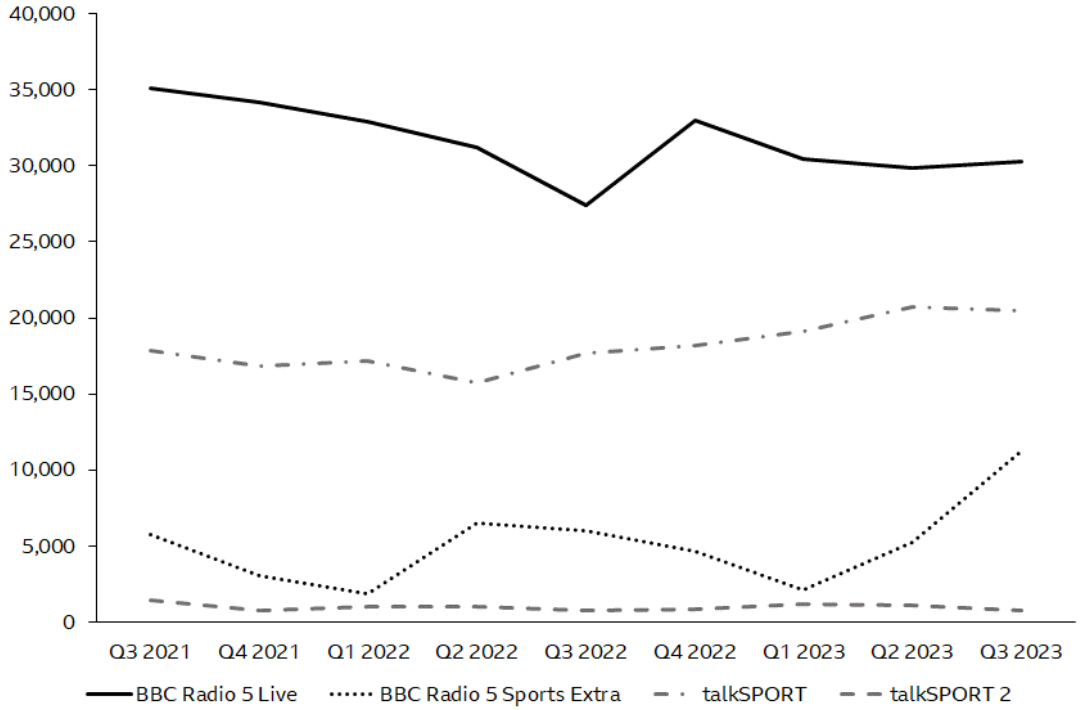
Figure 2: Adult 15+ audience quarterly reach for UK sports stations (000s)



Source: RAJAR. Radio 5 Live, Radio 5 Sports Extra, talkSPORT and talkSPORT 2.

Listening hours have also seen an increase for sports radio in the market. Listening to talkSPORT and talkSPORT 2 combined has increased by 10% since Q3 2021, for 5 Live and 5 Sports Extra, this was 2%. When measuring listening to all four stations for sports slots only, listening hours have increased by 18% over the same period.

Figure 3: Adult 15+ audience quarterly hours of listening for UK sports stations (000s)

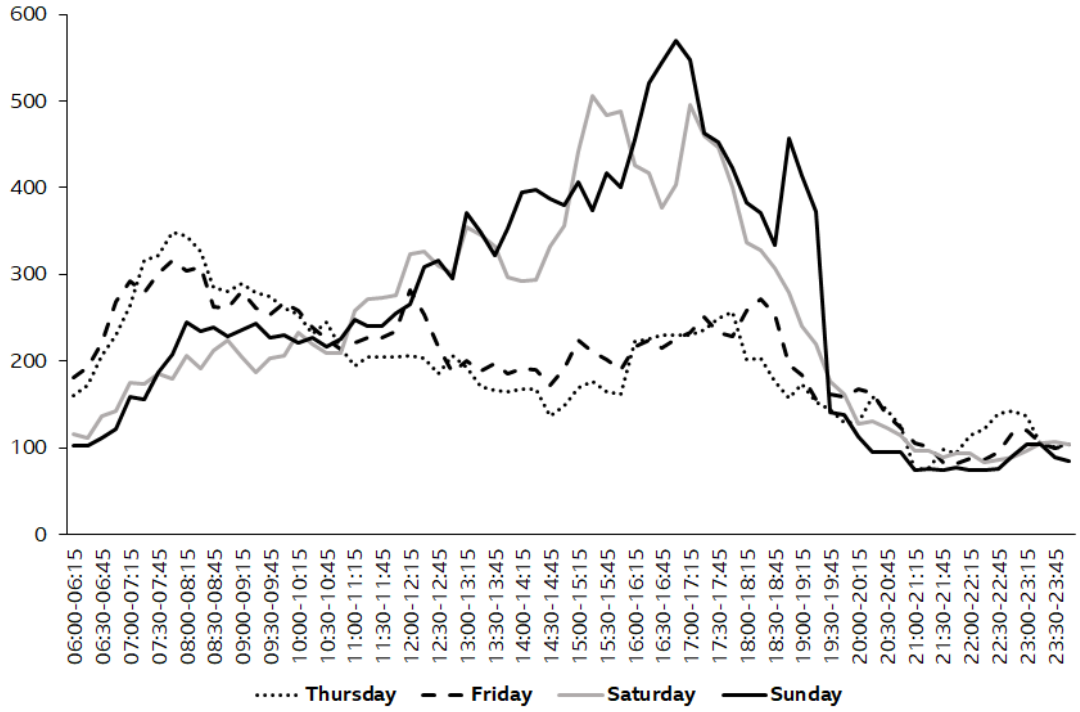


Source: RAJAR. Radio 5 Live, Radio 5 Sports Extra, talkSPORT and talkSPORT 2.

2.4 Importance of live sport

Live sport is the largest driver of listening for sports radio in the market and on the BBC. As the chart below shows, the largest reach for audience on 5 Live is found on the days which the station broadcasts live sport. Listening on those weekends with live sport also demonstrates that listening rises in the build up to live sport, but falls significantly once that live sport ends. In comparison, days which do not broadcast live sport reach smaller audiences throughout the day.

Figure 4: Reach of audience for 5 Live providing a comparison between listening on a typical weekend with live sport and days which rarely have live sport



Source: RAJAR Q3 2023

2.5 The growth of on-demand sports listening

There are now 11.3m people listening to podcasts every week in the UK. Audiences can access a wide array of podcast content, largely free across many platforms, made and distributed by a mixture of independent creators, production companies, broadcasters and brands from the UK and internationally. As with most genres, there has been a significant expansion in the number of sports and sports entertainment podcasts available to UK audiences, across a wide range of sports. It is among the most popular genres of podcast content in the UK, with 3 of the top 20 podcasts in December 2023 being football related [6]. Alongside the rise in popularity of podcasts there has also been an overall drop in listening to speech radio among audiences aged under 45, dropping

[6] Data according to PodcastTracker; podcasts counted for December 2023 are: *That Peter Crouch Podcast*, *Sky Sports Football* and *Football Daily (5 Live)*.

from reach in Q3 2021 to 11% reach in Q3 2023[7]. Since Q1 2020 (the last data available from RAJAR pre-covid) to Q3 2023, there has been an 83% growth in audiences under 45 who listen only to podcasts (and not radio). Sport coverage on national radio however continues to over-index for audiences under 45 and C2DE audiences than non-sport speech radio.

The BBC has made a significant creative investment in a wide range of sports and sports entertainment podcasts, all of which are currently available to listen via BBC Sounds. Many are made by teams from across the UK, featuring local voices and sporting stories. It is important for the BBC to maximise the value of its podcast comissioning strategy on-demand to provide those audiences on linear services an opportunity to find the best the BBC has to offer in this space, and bring a wide range of sports podcasts to audiences on radio. In addition, noted in the Government's Digital radio and audio review, it was noted that industry should consider migrating audience away from AM services and toward digital radio online. This is part of the need to strengthen the 5 Sports Extra offer and expose more audiences to existing sport podcast content available on BBC Sounds.

[7] RAJAR.

3. The BBC's proposals for 5 Sports Extra

Below we set out the key elements of our proposals for 5 Sports Extra.

3.1 Target audience

The current target audience of the station is 25-44 year olds. 5 Sports Extra reaches 2.24m UK adults weekly, including 0.55m 25-44 year olds, up 97k (21.5%) year on year (RAJAR Q3 2023).

Our analysis shows that listening to sport content on the BBC over-indexes for those audiences who use the BBC less frequently (fewer than 3 days per week). Heavier users (> 3 days per week) spend 2% of their BBC audio time with sports content vs. 10% for lighter users. Providing more sports content is likely to improve value from the BBC for those who currently get the least. In the chart below we can see that those coming to BBC Radio for sports content are more likely to be the lightest users with 70% of sports listeners coming in three days a week or less vs. 65% of News and Current Affairs listeners.

Figure *5*: Proportion of listening to BBC content by audiences who use the BBC

Frequency of listening to BBC content by days per week	Proportion of which are sport listeners	Proportion of which are BBC News & Current Affairs listeners
1 Day Per Week	45%	38%
2 Days Per Week	17%	18%
3 Days Per Week	8%	9%
4 Days Per Week	7%	8%
5 Days Per Week	6%	8%
6 Days Per Week	7%	9%
7 Days Per Week	9%	11%

Source: Analysis of BBC data.

Under these proposed changes, 5 Sports Extra will continue to target this audience and those interested in BBC sports content, as well as to seek to drive a regular daily habit with audiences who are currently underserved by the BBC, particularly those lower Socio-Economic groups outside London and the South-East.

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.

3.2 Budget

The extension is highly cost effective as all distribution and operational costs are already sunk. The additional costs incurred by the 5 Sports Extra extension involve only additional production and scheduling staff.

The current content budget for 5 Sports Extra is £3m per annum[8], this will not be affected by the move to a full-time schedule for the station. There is no commissioning spend on the network currently nor will there be any new commissioning spend by 5 Live for the extended hours as these will be fulfilled by existing sports content. We will however be employing an additional four new full time employees to support the full-time station, we estimate that this will cost an additional £250k per annum. The new roles will be focused on providing sourcing, editing for editorial and compliance, indexing, scheduling and outputting for the station, 7-days a week. There is a planned single spend of £150k for the re-launch of 5 Sports Extra but there will be no ongoing additional spend for marketing of the full-time station.

3.3 Editorial proposition

3.3.1 Broadcast hours

5 Sports Extra is currently running as a part-time extension to BBC Radio 5 Live providing additional live coverage of sporting events. The station's main remit will continue to remain live sport. However, as part of our new proposals, the station would broadcast additional hours of podcast content or non-live sport replays in the gaps between live sporting events. Since the start of this Charter period in 2017, 5 Sport Extra broadcast about 2,900 hours of live sport each year, around 56 hours per week.[9] The volumes vary year on year depending on the sports calendar. After implementing the changes, 5 Sports Extra will offer around 5,840 hours per year (113 hours per week), representing an additional 2,940 hours per year.

As noted above, under these proposals 5 Sport Extra will become a full-time station, and will typically broadcast from 6am to 10:00pm/10:30pm . However should a live sports event continue beyond 10.30pm, live coverage would continue on the network as it does currently. For the overnight hours (i.e. between 10:00pm/10:30pm and 6am), when there is no live coverage on-going, there will be an overnight loop and no content will be broadcast.

3.3.2 Live sports on 5 Sports Extra

5 Sports Extra will continue to broadcast its existing schedule of live sports. In addition, after 7pm each evening, it will simulcast 5 Live's sport programming, when it does have its own live sports programming.

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.

[8] Content spend across 2022/23 (including transmission costs) as reported in the BBC's Annual Report and Accounts 2022/23 report.
[9] Excluding 2020 which was severely impacted by coronavirus.

3.3.3 A linear home for the best BBC sport podcasts

The additional hours proposed will provide coverage of a broad range of sports including men and women's football, rugby (union and league), cricket and boxing as well as sports entertainment and documentary type podcasts such as *Sports Strangest Crimes, Tailenders, Tony Bellew Is Angry and Football Daily.* This will also provide audiences with a greater breadth and depth of sports coverage and storytelling than is currently offered on either 5 Sports Extra or 5 Live. The existing live coverage on 5 Live and the requirement for 70% of broadcast hours to be news and current affairs significantly constrains our ability to include podcast type content on 5 Live.

The changes will enable the BBC to better serve audiences with sports content they are passionate about, including more sports podcasts from the BBC Nations and Regions. These would include titles such as *Mental Muscle* from BBC Radio Cambridgeshire*, LGBT Sport Podcast* from BBC Radio Cornwall, *The Total Sport Podcast* from BBC Local Radio, the *Scottish Football Podcast* from BBC Radio Scotland, *Scrum V Rugby* from BBC Radio Wales, *The GAA Social* from BBC Radio Ulster and *Tractor Social* from BBC Radio Suffolk. This is also an opportunity to bring national network audiences to sports stories from across the UK.

An extended 5 Sports Extra can fully utilise BBC Sport's extensive sports rights portfolio including international, domestic and overseas domestic sports. The change will allow additional non-live programming to be placed around live sport events; this could include 'build up' before live games or events as well as post-fixture analysis with relevant podcasts, or non-live replays of previous commentaries. For example, for a big cricket weekend, the schedule can be adapted during big cricket tournaments and test matches to offer complementary output such as podcasts, day reviews and 'Cricket Daily' catch-ups. It can also offer catch-up commentary highlights of early morning or late-night matches at more social hours during the day. This aims to generate even better value from the BBC's sports rights portfolio by offering additional supporting content around our live sport commentaries. It is not commissioning new live programmes, rather it is making use of the BBC's existing sports catalogue.

The broadcast of this additional content will also showcase for linear audiences the BBC's creative investment in distinctive sports content, and encourage the transition of listeners to BBC Sounds where they can enjoy a richer, more personalised experience, and discover the full range of the BBC's content offer. The aim is to encourage new, light or lapsed users to (re) visit BBC Sounds and discover more sports and other content that they would enjoy. Bringing more listeners to existing podcast content will also increase value for money from the licence fee spend on this type of content.

For independent production companies, the change enables the BBC to better strengthen the benefit producers will receive from the BBC, through a second window on 5 Sports Extra. Access to the 5 Sport Extra audience will provide greater exposure for Indie programming and IP, that may have been previously curated for Sounds alone. We anticipate the change will motivate more indie support to the BBC and enable the BBC to schedule not just the best of BBC produced sports content, but also some of the best independently produced shows from UK sports indie talent.

3.3.4 Indicative schedules

Figure 6: Indicative schedule of 5 Sports Extra programming during a summer Ashes test match

	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	**TEST MATCH SPECIAL** THE ASHES: ENGLAND v AUSTRALIA DAY 1	**TEST MATCH SPECIAL** THE ASHES: ENGLAND v AUSTRALIA DAY 2	**TEST MATCH SPECIAL** THE ASHES: ENGLAND v AUSTRALIA DAY 3	**TEST MATCH SPECIAL** THE ASHES: ENGLAND v AUSTRALIA DAY 4	**TEST MATCH SPECIAL** 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**

Figure 7: Indicative schedule of 5 Sports Extra for a day with some live sport

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	22:30 – 06:00	**OFF AIR**
16:30	Nations Podcast 1		
17:00	Nations Podcast 2		
17:30	The 5 Live Football Daily		
18:00	Scottish Football Daily		

Figure 8: Indicative schedule of 5 Sports Extra for a day with no live sport[10]

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**

3.4 Distribution

The proposed changes will not change how 5 Sports Extra is currently distributed. That is, it will be available on DAB, BBC Sounds, other online apps, smart speakers, and digital TV.

3.5 Estimated listening to 5 Sports Extra following the proposed change

During this consultation we will be estimating the reach and time spent we anticipate on 5 Sports Extra as a result of the change. This will take account of current listening trends and audience behaviour.

The figures below are the BBC's initial estimates. This will be further defined during our planned research phase (see further detail in Section 4.4 below). We have provided our initial view above as part of the range of uplift, however this could change following further review.

[10] In 2023 there were only 30 days when the station did not broadcast any live sport.

Figure 9: Estimate of potential weekly reach and hours of listening

	Approximate reach (m)	Approximate average weekly hours of listening (m)	Approximate hours / listener
Existing schedule	1.4	5.3	3.8
Uplift from new programming	0.8	2.7	3.6
Total listening	2.2	8.0	3.7

Source: RAJAR Q2 2023, BBC analysis[11]

It is important to note that while we have estimated the potential size of 5 Sports Extra following the proposed change, we have not yet identified where that listening will come from. We consider that it is likely that the additional listening to the 5 Sports Extra will come from a combination of:

- Other BBC radio stations – in particular, Radio 5 Live – and other content available on BBC Sounds;
- Commercial radio offering sports radio in the UK, i.e. talkSPORT and talkSPORT 2, both owned by News Broadcasting;
- Other online audio sports services; and
- Organic growth, i.e. people who would otherwise have not listened to any of the above.

We do not anticipate any measurable impact on non-sports commercial radio or online services.

Any incremental increase to listening to BBC radio in total and therefore the scale of the impact of our proposed change to 5 Sports Extra on the commercial sector will depend on the degree to which the additional listening to the updated 5 Sports Extra is diverted from existing BBC services or from non-BBC services.

We will be carrying out further analysis and refining these estimates during our consultation, research and analysis stages of the Public Interest Test process (see further detail in Section 5.1.1.2 below). We welcome responses from all interested stakeholders, and will engage with News Broadcasting throughout the process.

3.6 Timescales for implementing the proposed change

If Ofcom determines that the BBC may carry out the proposed change to 5 Sports Extra, we intend to begin offering the new schedule within the first weeks of approval – though the content slate may be limited depending on completion of staff recruitment to manage the expanded station.

[11] We have used 5 Sports Extra's performance from Q2 2023 to calculate the uplift. We have not used Q3 2023 as it contained the England v Australia Ashes series which drove record levels of listening for 5 Sports Extra, i.e. reach of 2.24m compared to the average for the past 10 quarters of 1.4 m listeners.

4. Providing public value

4.1 Delivering against the BBC's Mission

The BBC is a mission-driven organisation. Its mission is to "act in the public interest, serving all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain".[12]

In doing so, the BBC must deliver great value for money in return for the licence fee. Alongside this mission sit five public purposes that further guide the operation of the BBC. These are:

- Providing impartial news and information;
- Supporting learning for people of all ages;
- Providing distinctive content;
- Reflecting the diverse communities of the UK and supporting the creative economy; and
- Reflecting the UK to the world.[13]

We consider public value in terms of how a change to the BBC's UK Public Services adds to the fulfilment of that Mission and the promotion of the Public Purposes. In this section we set out how we think changes to 5 Sports Extra will provide licence fee payers with greater value.

4.2 Our Public Value Framework

In 2020, we worked with Professor Mariana Mazzucato and the UCL Institute for Innovation and Public Purpose (IIPP) on developing a new framework for the assessment of public value at the BBC, to enable us to make a more rigorous assessment. In December 2020, the BBC and IIPP published *Creating and measuring dynamic public value at the BBC – A scoping report*.[14]

There are many different facets to public value, and in order to evaluate the public value generated by our proposals we discuss these in terms of the different domains or groupings of value:

- **Individual value** – value generated in relation to an individual's consumption of our services – the extent to which our changes will meet audience expectations, continue to offer them a truly universal service, and therefore provide good value for money for the licence fee. As a content led organisation a large proportion of the value we generate is through consumption of our content.
- **Societal value** – value generated in relation to broader society; and
- **Industry value** – value generated as it relates to industry – the extent to which our changes can promote industry value, acting as a creative force by supporting

[12] BBC Royal Charter, Article 5
[13] BBC Royal Charter, Article 6
[14] Creating and Measuring dynamic public value at the BBC – A scoping report, Institute for Innovation and Public Purpose, December 2020

investment, fuelling innovation, and shaping and stimulating the creative economy across the UK.

Our approach continues to develop; the domains of value provide a consistent structure for analysing public value across our services and aid us as we move towards more detailed quantification of the value we generate.

4.3 Our public value hypothesis

We consider that extending the hours of 5 Sports Extra, thus changing it from a part-time to a full-time station will contribute to the BBC's Mission and Public Purposes, specifically, to the third and fourth public purposes i.e. providing distinctive content for all our audiences and representing and serving the diverse communities of all of the UK's nations and regions, respectively.

In particular, we consider that our 5 Sports Extra proposals will:

- Improve value for money for linear radio audiences, by making more of our brilliant on-demand sports content discoverable on network radio;
- Improve the value currently underserved C2DE and younger audiences are receiving from the BBC;
- Improve discovery of on-demand sports content on BBC Sounds through prominence on network radio;
- 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; and
- Broaden the range of sports being represented on BBC linear audio services, particularly those that currently receive less broadcast coverage.

4.3.1 Improve value for money for linear radio audiences, by making more of our brilliant on-demand sports content discoverable on network radio

Expanding the operating hours of 5 Sports Extra will increase the value for money of the licence fee to a range of audiences. The station is currently off-air for the majority of the time. While its current on-air offering provides a unique and positive service for our audiences, this also does not make best use of broadcast capacity. Extending the broadcast hours of the station will improve our efficient use of capacity for the benefit of our audience.

Linear radio remains the most significant way in which audiences consume audio content. The expansion of 5 Sport Extra enable us to deliver additional value to those linear audiences and expose them to the breadth of our on demand content at little incremental cost.

4.3.2 Improve the value currently underserved C2DE and younger audiences are receiving from the BBC

The BBC's Charter requires us to serve all audiences through the provision of impartial, high-quality and distinctive output and services which inform, educate and entertain.[15] In

[15] BBC's Royal Charter, article 5

its sixth annual report on the performance of the BBC, Ofcom stated: "Audiences from D and E socio-economic groups remain less satisfied with the BBC's performance than those from other groups".[16] Ofcom also noted in its BBC Audiences Review regarding D and E socio-economic groups that the BBC "must continue to find innovative ways of bringing content to audiences across all its platforms."[17]

Our audience data also shows that sports content performs well among C2DE audiences. When we look at sports output on Radio 5 Live we can see it over-indexes for 25-34s and C2DE while 5 Sports Extra over indexes for 25-34s but under-indexes for C2DE. By providing a dedicated and integrated sports destination, we hope to therefore offer greater value to and appeal more to those audience groups and use 5 Live Sports content to flag where listeners can hear more about a range of sports including sports podcasts.

Figure 10: Audience index performance for sport on 5 Live and 5 Sports Extra

Audience Segment	Index for sport on 5 Live	Index for 5 Sports Extra
Adults 15-24	92	87
Adults 25-34	106	117
Adults 35-44	100	97
Adults 45-54	106	96
Adults 55-64	99	95
Adults 65+	96	106
Social Grade: ABC1	98	108
Social Grade: C2DE	105	83
White	101	105
B.A.M.E.	93	52
Out of London	98	99

Source: RAJAR Q3 2023. To note, this quarter includes The Ashes on 5 Sports Extra which is typically the predominant broadcast on 5 Sports Extra. As such, the audience demographics may be impacted.

4.3.3 Improve discovery of on-demand sports content on BBC Sounds through prominence on network radio

Exposure to additional content, some of which available only on-demand on Sounds, both improves the value of that content itself, but also will act as a bridge drawing listeners to the wider range of content available, that they might be missing out on, on BBC Sounds. An expanded 5 Sports Extra can act as a valuable tool to help audiences discover a range of BBC sports podcasts on linear radio, and encourage the transition of listeners to BBC Sounds where they can discover further episodes and other relevant BBC content, with a richer, more personalised experience.

[16] Ofcom annual report on the BBC 2022-23, Ofcom, p.4
[17] BBC Audience Review: Understanding what factors may drive lower satisfaction levels among D and E socio-economic groups, Ofcom, p.3

4.3.4 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

A full-time 5 Sports Extra will also enable the BBC to boost voices from across the nations and regions by delivering more distinctive and relatable content for audiences across the UK. A portion of the schedule will be set aside to bring the best of our Nations and Regions sporting content to a Network audience. This may include podcasts such as *The Scottish Football Podcast* and *A Cold Wet Tuesday Night* focussing on local sporting stories that have resonance for wider sport. Similarly with our wide catalogue, 5 Sport Extra will bring new voices to a network radio audience focussing on different communities of the UK such as *The LGBT Sports Podcast*.

Both of these aspects of the expansion will bolster the fulfilment of the BBC Public Purpose 4 by increasing representation of the diverse communities of the UK on Network radio.

4.3.5 Broaden the range of sports being represented on BBC linear audio services, particularly those that currently receive less broadcast coverage.

We will continue to fulfil the stations mission to give greater coverage to those sports which receive less broadcast coverage in the wider market. By making better use of the broadcast capacity, 5 Sports Extra can provide additional content to boost the live-sport offer with adjacent podcast content that brings greater value to audiences. This can be achieved through podcasts which 'build up to…' or 'follow on from…' the big live event of the day (e.g. a race preview podcast played out ahead of an F1 race on the weekend).

An expanded 5 Sports Extra will be able to leverage the full breadth of the BBC's on-demand offer to populate the schedule and enhance the current live sport offer. This will not just focus on discussion shows but will draw on the BBC's rich array of sport related documentaries and investigative podcasts.

4.4 Planned research

As part of the Public Interest Test process we will test the veracity of these hypotheses through a range of quantitative and qualitative techniques. This will include:

- Analysis of internal and external audience data, e.g. internal BBC data, RAJAR, etc.;
- Modelling the uplift in viewing for the purposes of our market impact analysis will also contribute to understanding of individual audience public value;
- Bespoke audience research, both qualitative and quantitative; and
- Analysis of responses to this consultation and active engagement with stakeholders.

In our Public Interest Test submission we will set out our analysis and assessment in detail, with supporting evidence. Where possible we will provide quantitative analysis to demonstrate our public value. However, as acknowledged by the Framework Agreement it "will require qualitative assessments to be made and that direct comparison of factors

relating to public value and factors relating to risks to fair and effective competition may not be possible."[18]

[18] BBC Framework Agreement, clause 8(2) and 10(4).

5. Further details on the consultation

5.1 The Public Interest Test process

The Public Interest Test is a key component of the BBC's system of governance, which took effect in the current Charter and Agreement from April 2017.[19]

The Agreement gives the BBC's Board the responsibility, in the first instance, for considering the impact of certain planned changes to the BBC's UK public services.[20] The BBC must consider whether any proposed changes to these activities are material.

The BBC may only materially change its UK public services[21] where:

a) It has carried out a Public Interest Test;
b) The test is satisfied; and
c) Ofcom has determined that the proposal can proceed.[22]

For the UK Public Services, the Agreement defines a material change as the launch of a new UK public service, or any change to a UK Public Service which may have a significant adverse impact on fair and effective competition.[23]

Below we set out the process.

5.1.1 The BBC part of the process

We consider it unlikely that the proposals to extend originated hours on 5 Sports Extra, as outlined in detail in Section 3 of this consultation document, will have a significant adverse impact on fair and effective competition. However, the increase in originated hours is clearly a change to an existing UK Public Service, and it is it is possible that this increase may have such an impact. As such we are carrying out a Public Interest Test.

5.1.1.1 Consultation & Engagement with stakeholders

As part of the process the BBC has committed in its published Policy on Material Changes to seek feedback from interested parties when it is undertaking a Public Interest Test.[24] As Ofcom notes in its Operating Framework, it is in third parties' interests to ensure that they raise concerns with the BBC when we are conducting our Public Interest Test and to draw attention to potential issues arising from the proposals

[19] BBC Royal Charter (Articles 12, 20, 37, 46 and 63) and Framework Agreement (Clauses 7-11 in relation to UK Public Services and 16-20 in relation to non-service activities)
[20] BBC Royal Charter, Article 20(4)
[21] The BBC maintains and publishes a list of the UK Public Services in line with Schedule 1, Part 1 of the Framework Agreement.
[22] BBC Framework Agreement, Clause 7(6)
[23] BBC Framework Agreement, Clause 7(7)
[24] Policy on material changes to the BBC's public service activities and commercial activities

at this stage.[25] This will allow potential issues to be taken into account by the BBC when it develops its final proposals.

The BBC welcomes the opportunity to discuss our proposals further with interested stakeholders. Specifically, the BBC will be engaging with a range of stakeholders including other commercial broadcasters and audience groups.

5.1.1.2 Research and analysis

To inform the Public Interest Test, the BBC will use audience research and data, and carry out its own analysis into the public value generated by the proposal.

In order to assess the scale and likelihood of any adverse impact on fair and effective competition, we will consider responses to the consultation, industry data and audience research (where available), and economic analysis.

5.1.1.3 Decision by the BBC Board

To meet the criteria set out in the Public Interest Test, the BBC Board must be satisfied that the new initiative supports the BBC's mission; that it promotes its public purposes; that the BBC has taken reasonable steps to ensure that the change has no unnecessary adverse impact on fair and effective competition; and that the public value of the initiative justifies any impact on the competition. Where the BBC Board determines that the above elements of the Public Interest Test are satisfied, the BBC will publish a non-confidential version of the proposed change and refer it to Ofcom. The BBC aims to do so in the summer.

5.1.2 The Ofcom part of the process

As the BBC's regulator, Ofcom will make the final determination on whether a material change can proceed or not. Within 6 weeks of the publication of the Public Interest Test submission, Ofcom is required to decide whether the change proposed by the BBC is material. If Ofcom decides that the proposed change is material, it will then conduct a Competition Assessment, or a shorter assessment, involving the following steps:

- Survey the opinions of stakeholders;
- Review the procedures the BBC has followed in carrying out its Public Interest Test, including whether the BBC has consulted with external stakeholders appropriately;
- Review the BBC's own assessment of the public value of the change;
- Assess the adverse impact of the proposed change on competition; and
- Assess whether the public value of the change justifies any adverse impact on competition.

[25] Assessing the impact of proposed changes to the BBC's public service activities: Ofcom's procedures and guidance, paragraph 4.17

At the conclusion of a BBC Competition Assessment, Ofcom can reach four types of determination:

- To send the proposal or elements of the proposal back to the BBC for reconsideration;
- To allow the change to proceed;
- To require modifications or conditions to be made before the change proceeds; or
- To find that the BBC may not proceed with the proposed change.

If Ofcom carry out a shorter assessment, Ofcom can reach two types of determination:

- To send the proposal or elements of the proposal back to the BBC for reconsideration; or
- To allow the change to proceed.

5.2 Public sector equality duty and Welsh language assessment

The BBC is required by its Charter to serve all audiences, and to reflect, represent and serve the diverse communities of the UK. Also, the Equality Act 2010 requires public bodies to have due regard to the need eliminate discrimination, advance equality of opportunity and foster good relations within society as regards people with protected characteristics.

The proposals set out in this document relate to the provision of a content service (BBC Radio 5 Sports Extra) and as such are not subject the public service equality duty set out above. However, the BBC still considers it important to consider the impact of its proposals on any of the groups with protected characteristics, especially any detrimental impacts.

We consider that these proposals can have positive impacts on all audiences, and are consistent with the BBC's mission to serve all audiences; are designed to reach audiences currently less well served by the BBC; and will not require the reduction of other services to other audiences. We have not identified any detrimental impacts on groups with protected characteristics. However, we welcome stakeholders' views on these conclusions.

The Welsh language has official status in Wales, and must be treated no less favourably than the English language. As a public body, the BBC has to comply with specific "Standards" when formulating, reviewing or revising policy, and publishing consultation documents, which require it to consider and seek views on any positive or adverse effects on (a) opportunities for persons to use the Welsh language, and (b) treating the Welsh language no less favourably than the English language.

Again, the Standards do not apply as such where (as here) the proposals concern "broadcasting", but given the Charter obligations mentioned above and also the specific requirement on the BBC to support the regional and minority languages of the UK, we have also taken Welsh language considerations into account when formulating our proposals (including proposals which are not targeted at Wales specifically but are of interest across the UK). We do not consider our proposed changes and decisions have any impact on opportunities for persons to use the Welsh language or treat the Welsh language no less favourably than the English language. We also do not believe there are

ways in which our decisions and proposals could be formulated to have, or increase, a positive impact, or, not have adverse effects or decrease any adverse effects.

We welcome stakeholder views.

5.3 The BBC's consultation questions

This consultation runs for six weeks from 14 February to 27 March 2024.

This consultation sets out information about our planned extension for 5 Sports Extra. Our intention is to provide stakeholders with information sufficient to enable them to meaningfully engage with us as we finalise our proposals, which we will ultimately include within a Public Interest Test. While there remain areas of uncertainty at this stage of our process, we consider we have provided as much information as we can on our plans without publishing any information that may be commercially sensitive.

We are seeking views from all stakeholders, and in particularly from industry, on our proposal for 5 Sports Extra predominantly on the following 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?

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?

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?

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?

5.4 How to respond

We would be grateful if respondents could, wherever practical, respond to each question directly.

If you would like to respond to this consultation, please email your response to publicinterest.test@bbc.co.uk.

Please contact publicinterest.test@bbc.co.uk if you have any questions about this process, our consultation, or want to discuss these proposals further.

Please indicate in your response whether any or all of your response should be treated confidentially. We will use responses to inform our future work on the Public Interest Test. We may refer to responses, either in general terms or specific references, as part of the Public Interest Test, which we will publish. For confidential responses we may ask about how to include these in a Public Interest Test where relevant, as well as whether or

not we can provide these to Ofcom on a confidential basis to help Ofcom with its assessment on materiality.

We are unable to consider comments relating to broader licence fee issues or comments relating to BBC programmes and content.