

Question	Your response
<p><b>Question 1:</b> Do you agree with our provisional conclusions from our review of the BBC's assessment of the public value of the proposals for:</p> <ul style="list-style-type: none"> <li>I. the proposed DAB+ music stations; and</li> <li>II. 5 Sports Extra.</li> </ul> <p>Please provide evidence to support your views, specifying which our conclusions you are referring to.</p>	<p>Confidential? – N</p> <p>Radio Lear does not agree with Ofcom's provisional conclusions regarding the public value assessment of the proposed BBC DAB+ services, particularly the additional BBC Radio 3 (R3U) service.</p> <p>The expansion of BBC radio services into new DAB+ offerings risks distorting the digital radio ecology, particularly for emerging community services like Radio Lear that are licensed to serve creative, place-based audiences on Small-Scale DAB (SSDAB). The BBC's public value justification appears to prioritise audience choice without acknowledging the effect on diversity of voice and equitable access for new entrants.</p> <p>BBC Radio 3 already occupies a privileged and well-established position in the UK's radio landscape, with guaranteed access to both FM and DAB platforms. The introduction of a second, complementary service under the BBC Radio 3 umbrella may fragment listening and siphon attention, funding, and prestige from emerging cultural platforms.</p> <p>Radio Lear exists to support storytelling, creative expression, and civic dialogue in local communities, with a mandate to reflect diverse and underrepresented perspectives. The duplication of BBC services undermines the fragile foothold that services like ours are striving to establish. This expansion of BBC offerings should not come at the cost of genuine plurality and innovation in the radio sector.</p>
<p><b>Question 2:</b> Do you agree with our assessment of the likely impact of the proposals on fair and effective competition (including as set out in annex 1)? Please</p>	<p>Confidential? – N</p>

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<p>provide your answer and any supporting evidence separately for:</p> <ul style="list-style-type: none"> <li>I. R1A, R1D and R3U;</li> <li>II. R2E; and</li> <li>III. 5SE</li> </ul>	<p>Radio Lear disagrees with Ofcom’s assessment of the competitive impact of the proposals, particularly with respect to R3U.</p> <p><b>R3U:</b> The addition of a new BBC Radio 3 station on DAB+ creates a significant barrier to the growth of community-led, non-commercial services. While the BBC frames this as an enhancement of classical and cultural output, its dominance in the field of arts broadcasting, underpinned by legacy brand recognition, marketing budgets, and privileged spectrum access, means the introduction of R3U will crowd out smaller, innovative services on SSDAB multiplexes. This diminishes fair competition and entrenches centralised cultural production at the expense of diverse, experimental, and regionally-rooted content.</p> <p><b>R1A / R1D:</b> Although youth-oriented content is important, the BBC’s proposal reinforces its incumbency across multiple digital streams, without clear mechanisms to avoid overshadowing existing or emerging independent youth-focused content providers operating in the same space.</p> <p><b>R2E / 5SE:</b> The extension of sports content across more platforms raises fewer concerns, given the already wide availability of commercial sports coverage and the niche appeal of some sports genres. However, the broader trend of expanding BBC offerings into every available niche risks squeezing smaller operators through duplication and brand saturation.</p>
<p><b>Question 3:</b> Do you agree with our provisional conclusions on the BBC’s proposed changes to its radio services? Please provide evidence to support your views, indicating which of the BBC’s proposed changes you are referring to.</p>	<p>Confidential? – N</p> <p>Radio Lear does not agree with the provisional conclusions that support the BBC’s proposed changes, particularly the creation of a new Radio 3 service. This proposal exacerbates the BBC’s concentration of cultural broadcasting</p>

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	<p>on both FM and DAB platforms. While Radio Lear acknowledges the BBC’s contribution to high-quality arts and culture broadcasting, we believe that further expansion risks homogenisation and limits opportunities for grass-roots, experimental services to find an audience.</p> <p>If Ofcom approves the proposed changes, we strongly recommend that the BBC be required to relinquish its FM spectrum currently used for BBC Radio 3. This would allow valuable FM capacity to be reallocated to community-focused services, particularly those with a demonstrable track record of public engagement, social value, and local content provision. Such a measure would rebalance spectrum access, creating space for innovation and plurality, and ensuring public value is not concentrated solely within legacy institutions.</p>
<p><b>Question 4:</b> Do you agree with our proposal not to set additional operating licence conditions on R1D, R1A and R3U if we approve them?</p>	<p>Confidential? – N</p> <p>Radio Lear does not support the proposal to allow these services—particularly R3U—to proceed without additional licence conditions. Given the potential market dominance of the BBC and the impact on smaller, community-based and independent broadcasters, Ofcom should require the BBC to demonstrate how each of these services will:</p> <ul style="list-style-type: none"> <li>• Avoid duplicating existing BBC content;</li> <li>• Support the development of emerging independent media;</li> <li>• Provide commissioning opportunities for new, regionally based producers;</li> <li>• Refrain from drawing undue listener share away from SSDAB services serving specific cultural and local community needs.</li> </ul>

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	<p>At a minimum, any approval should include conditions that require the BBC to publish annual impact reviews, including consultation with small broadcasters, and to co-develop resource-sharing or promotional arrangements to ensure smaller services can remain visible and viable within the increasingly saturated digital radio environment.</p>