## Question

## **Question 1**: Do you agree with our provisional conclusions from our review of the BBC's assessment of the public value of the proposals for:

- the proposed DAB+ music stations; and
- II. 5 Sports Extra.

Please provide evidence to support your views, specifying which our conclusions you are referring to.

## Your response

## Confidential? -N

i – UK Music partially agrees with Ofcom's assessment of public value of the proposed new stations. It is important to strike a balance in providing platforms for emerging artists and ensuring a diverse range of music is showcased to listeners. A radio play for an upcoming artist can act as a career catalyst, not just for the artists themselves but also for songwriters, producers and independent labels involved. For some independent labels, one successful track can make a huge a difference to that companies' survival or growth.

Radio still ranks as the number one source for adults discovering new music, with 75% of adults relying on radio to explore new music. The enduring importance of radio as a platform for music discovery is underscored by the percentage of adults listening to radio every week remaining relatively stable at 88% in 2023 (compared to 91% in 2010). Our submission to the BBC's consultation on the new stations can be found here.

Radio 1 Dance – We agree with Ofcom that the BBC's commitment to ensuring a third of the station's music is new and 45% is British will deliver public value. We also support Ofcom's recognition of live music as a key part of the station's offering. However, we would like to see a specific commitment to the volume of live and specially recorded music provided. Additionally, we believe the BBC's pledge to play over 3,000 unique tracks per year is insufficient - Radio 1 played 12,248 unique tracks in 2023, more than three times the number proposed for Radio 1 Dance.

**Radio 1 Anthems** – We agree with Ofcom's suggestion that despite the commitment 4,000 unique tracks per year represents an improvement over commercial stations like KISSTORY, the focus on "classic hits" may reduce risk taking on the station. We agree with Ofcom that the use of live performances from the BBC

Question	Your response
	archive would support the quality and range of the service. In addition, use of reimagined classic tracks by new artists would further strengthen the offering.
	Radio 3 Unwind - We agree with Ofcom that the BBC needs to commit to a high proportion of recent recordings to help the public discover new music and drive value for both individuals and the industry. We believe this should be a third of tracks being recordings from the last ten years. While we welcome the BBC's revised target of 25% of music being UK artists, we think that Ofcom should encourage its expansion to a third of music being by UK artists/composers. We support Ofcom's emphasis on programmes focussed on living and contemporary composers, as well as their call for more promoting more composers from under-represented groups.
	Radio 2 Extension – We agree with Ofcom's criticism of Radio 2 Extension failure to include any new music. As noted in our submission to the BBC's original consultation we think that the station should commit to at least a third of tracks being new music. We also agree that the BBC's archive of specially recorded and live content would help support the quality and range of output.
Question 2: 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 provide your answer and any supporting evidence separately for:  I. R1A, R1D and R3U; II. R2E; and III. 5SE	<ul> <li>i. Radio 1 Dance, Radio 1 Anthems, Radio 3 Unwind - We agree with the assessment that these stations would have limited impact on listening to commercial operators.</li> <li>ii. Radio 2 Extension - The health of the commercial sector is not thwarted by the BBC offering a range of music services. Both the BBC and the commercial sector offer distinct and complimentary services that lead to increased choice for audiences. As noted in response to question 1, reinforcing Radio 2 Extension's commitment to new and unique music would further address any concerns about market impact, ensuring a balanced and thriving ecosystem for both public service and commercial broadcasters</li> </ul>
Question 3: Do you agree with our provisional conclu-	Confidential? –N

Question 3: 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.

As noted in our answers above, UK Music's preference is for the BBC to proceed with all of the planned extensions, provided there are strong commitments to supporting UK artists and prioritizing new, unique music. We believe that this provides the greatest benefit to the UK music sector and to the BBC providing a vibrant cultural contribution. The concerns regarding Radio 2 Extension's potential impact on commercial operators - which have led to Ofcom's conclusion that the BBC may not proceed with the station - could be effectively mitigated

Question	Your response
	through clear commitments to distinctive programming and a stronger emphasis on showcasing new and unique musical content.
Question 4: Do you agree with our proposal not to set additional operating licence conditions on R1D, R1A and R3U if we approve them?	Confidential? –N  While we understand the desire for greater flexibility in the BBC's operative licensing, we still believe certain conditions should be in place for the new stations. Specifically, clear requirements regarding the proportion of British and new music are vital to ensuring these services continue to deliver distinct public value. The primary stations are subject to these requirements, and therefore, the extensions should be held to the same standards. Without such conditions, there is a risk that these stations could drift away from supporting British artists and new talent, limiting the vitality of the UK Music industry and undermining the BBC's public service remit.