

# Commercial Radio's Response to the Green Paper: A BBC Commentary

## Introduction

As part of the independent review of the BBC by Lord Burns, the BBC submitted a large amount of information about each of its radio networks, which included comprehensive independent analysis of our music output conducted by Intelligent Media. It is available online on the DCMS Charter Review website.

This paper examines some of the claims made by the Commercial Radio Companies Association (CRCA) in its response to the Green Paper on Charter Review – reinforced by the submissions of GCap Media and Chrysalis Radio.

The BBC disputes some of the claims made in these responses about the speech content of Radios 1 and 2 and the extent to which it contributes to the public purposes outlined in the Green Paper. We also highlight many of the methodological limitations of GCap's analysis of BBC Radio's music output, and draw attention to the inaccurate conclusions that they reach as a result.

## Speech and the BBC's Public Purposes

We do not believe that the research on which the CRCA bases its response offers a meaningful comparison between the BBC and the commercial radio sector.

The CRCA paper draws on a study by Hallet Arendt of the public purpose speech content of the mainstream output of BBC Radios 1 and 2. Elsewhere in its submission, CRCA makes reference to a paper published in September 2004: "Commercial Radio in Public Service". This paper used a very narrow definition of public service, covering news, weather, travel, "what's on" information and social action. In the absence of any clear definition, we assume that the Hallet Arendt study used this definition for its analysis. This is not a definition of public service that we recognise – nor one that reflects the more detailed definition offered in the Green Paper, which defines the public purposes of the BBC as:

- Sustaining citizenship and civil society;
- Promoting education and learning;
- Stimulating creativity and cultural excellence;
- Representing the UK, its Nations, regions and communities;
- Bringing the UK to the world and the world to the UK; and,
- Building digital Britain.

We also believe that the methodology used in the study exacerbates the problem. The CRCA analysis was undertaken for two commercial stations on one day each, and one weekday and a weekend day for Radios 1 and 2. Taken together with the narrow definition of public purpose speech, this approach would appear to exclude religion, comedy and documentaries from the calculation. *Pause for Thought* is a daily feature of the both the Sarah Kennedy and Terry Wogan Shows, Radio 2's award-winning travel news is broadcast twice an hour and in *Tracks of My Years*, Ken Bruce talks to musicians about their musical influences every weekday morning. The analysis almost certainly misses Radio 1's social action output since this is clustered in campaigns rather than scheduled regularly. It is also difficult to see the justification for removing the Jeremy Vine Show from the overall calculation of news provision on Radio 2 when compared to commercial radio.

Similarly, Radio 1's commitment to 310 hours of news and sport a year is a minimum commitment and in 2003/4 the network actually broadcast over 330 hours – 6.5 hours a week in comparison with 5.5 hours a week on Capital and 1.5 a week on Galaxy.

Furthermore, no reason is given for the choice of commercial stations with which Hallet Arendt compares the output of Radios 1 and 2 – and we do not believe that they are adequately representative of the commercial radio sector as a whole. Lincs FM, for example, was featured in the September 2004 CRCA paper, which noted that it broadcasts more than twice the national average number of weather forecasts. City FM won the NTL commercial Radio news award in 2004, suggesting a particularly strong tradition of public service.

We would also contend that the Hallet Arendt analysis is based on a false premise: that only speech output can deliver public purposes and that music should be discounted from the calculation. We disagree. Music is also clearly part of the BBC's role as a public service broadcaster, and approximately 10% of Radio 1's daytime speech output focuses on putting the music into context or speaking to the artists who have created it – directly promoting creativity. The CRCA analysis ignores Jo Whitley's tireless promotion of new music, for example, or Terry Wogan's huge power to break new and unique acts.

An important part of our commitment to “stimulating creativity and cultural excellence” is fulfilled with the emphasis we place on live music, new music and UK music on both Radios 1 and 2. In a typical week of daytime output, over half of the music on Radio 1 is currently new and between 45 and 50% of this is by UK artists. On Radio 2 around a quarter of the music is new and well over half of this is by UK acts. Overall, Radio 1 plays around 275 hours of live music a year, with over 200 hours broadcast on Radio 2.

In order to assess the full value of each network's output, it is important to look at the combination of new, UK and live music, as well as the amount of speech they offer. One of the speech elements specifically mentioned by the CRCA as not fulfilling a public purpose was promotion of Radio 1's “*One Big Weekend*” in Sunderland. This was a weekend of music that featured 56 hours of live programming and provided a stunning line-up of live music for 30,000 people – many of whom had queued for up to 12 hours to get their free tickets. As the local newspaper concluded: “We doubt the city has ever had such positive exposure over a sustained period of time”.

The strength of BBC Radio lies in the process by which speech and music are crafted together into distinctive output for listeners that meets the full range of our public purposes – not just those that CRCA chooses to select. While CRCA dismisses the speech content in Steve Wright's Radio 2 as being based around trivia and celebrity guests, the judges of the Sony Awards this year disagreed. They awarded Wright their lifetime achievement award, citing his “distinctive mastery of the medium”, the inspiration he has given to other broadcasters and the “vast creativity he has brought to his output across three decades”.

Finally, we wish to dispute the claim made by CRCA that Radios 1 and 2 are perceived by listeners to be “celebrity-presented, entertainment-based pop music stations”. This conclusion is based on a survey asking if each station plays “popular music” and has “well-known presenters”. Not only do these questions not support the conclusion, but it is wholly unsurprising that non-listeners to a station were less likely to agree that it plays popular music, or that the presenters are well known.

### CRCA Music Research

The CRCA's submission makes a number of claims about the music output of the BBC networks with which we also disagree. For example, CRCA implies that the large amount of "new" music on Radios 1, 2, 1Xtra and 6 Music is similar and clustered around the same middle-ground of genres, simply by being new. In fact, a vast amount of contemporary music is produced, and each network focuses on specific areas of repertoire. There is very little crossover between the different services.

Steve Wright's Radio 2 programme is singled out for specific criticism. The evidence used for this criticism is a comparison of the percentage of Top 20 tracks played in the show (61%) with the Radio 2 average (52%). In real terms the difference is just one more song out of every ten played. Our own research demonstrates clearly the distinctive nature of the music played by Steve Wright over a week: in a comparison with six other stations, we found that three-quarters of the tracks he played were not featured on any other station at that time. Of 124 songs, only six could be heard on Capital, and only eight on Heart 106. In contrast, Capital and Heart shared 32 tracks over the same period.

The music research that we submitted as part of the DCMS informed seminars in 2004 illustrated each BBC network's distinctiveness over a range of measures. These included the range and depth of music played the level of support for new and UK artists, and the level of live music. CRCA – in contrast – concentrated on only one measure: the overlap of songs between networks.

This analysis (conducted by GCap) is inaccurate – appearing to miss out large amounts of each station's output. For example, it claims that Radio 2 played 177 tracks in their sample week, while the true figure is closer to 500. 1Xtra also suffers in this way – with only 71 tracks detected by GCap's analysis rather than the 200-250 that were played. We believe that the methodology was not sophisticated enough to capture the full range of music played by the BBC. Many of the tracks will have been too new to have been "electronically tagged", so automated processing of output would have ignored this music entirely. Similarly, more obscure older tracks would also have been ignored.

The BBC is currently processing the results from a new comparative survey, but we believe that, based on accurate sampling, the true figure for the overlap between Radio 2 and Capital will be less than half the 42% GCap claims, and just 29% between 1xtra and Choice (not 77%).

In addition to the survey's technical limitations, in a number of places the analysis also attempts to make comparisons by ignoring tracks just played once - yet it is precisely these tracks that contribute to the distinctiveness of the BBC's networks. In all, this excludes 60% of songs played by Radio 1 in the daytime, and 90% of Radio 2's tracks. The limited scope of this methodology is entirely inappropriate for measuring networks as broad and eclectic as the BBC's.

### Conclusion

We do not believe that these three submissions adequately address the elements of a radio service that contribute to public service.

The analysis underpinning CRCA, Chrysalis and GCap's responses is flawed by excessively narrow definitions, by a very limited period of analysis, and by selecting commercial radio stations that are not representative of the sector as a whole.

Methodological limitations also create a distorted picture of the BBC's music output.

While we recognise that the commercial radio sector makes a valuable contribution

to the ecology of public service broadcasting in the UK, the BBC is required to sustain a deeper and broader commitment to delivering public value through its radio networks, and we take issue with analysis that ignores this fact.