

11th June 2004

Tim Gardam
Independent Reviewer of the BBC's Digital Services
DCMS
2-4 Cockspur Street
London
SW1Y 5DH

Re: Review of BBC Digital Services

Dear Mr Gardam,

British Music Rights¹ welcome the opportunity to respond briefly to the consultation exercise on the BBC's Digital Services.

We are willing to contribute further to the consultation process. However, due to the overwhelming burden of consultations in the communications arena, we have been unable to make a more full and complete response to your consultation review.

Notwithstanding our own constraints, enclosed are our initial reactions to the review, which concentrate in particular on the BBC's Digital Radio Services.

We would like to propose that we organise a meeting with yourself and representatives from our constituent members in order to explain our considerations in more detail.

We will be in touch shortly with a view to arranging a forthcoming meeting.

Yours sincerely,

Scott Walker

Public Affairs Advisor
British Music Rights

¹ British Music Rights is the consensus voice of British composers, songwriters, music publishers and their collecting societies. The members of British Music Rights are the British Academy of Composers and Songwriters, the Music Publishers Association, the Mechanical Copyright Protection Society and the Performing Right Society, which together represent over 37,500 composers and songwriters and 2,500 music publishers. Further information about British Music Rights can be read on our website: www.bmr.org

British Music Rights is also co-chair of the Music Business Forum (MBF), an informal group of music business organisations that, since its inception in the spring of 2002, has gained a reputation as an effective representation, acting in the interests of the wider music making community.

British Music Rights Response to the Review of BBC Digital Services

We welcome the opportunity to make initial comments in response to the BBC Digital Review. Our short response concentrates on Digital Radio Services.

1. In the first instance, the consultation review should take into account the consideration of music creators, songwriters and music publishers. The digital (radio and television) services offered by the BBC are of growing importance to our constituent members to gain exposure to audiences and viewers.
2. The BBC's commissioning and support for British music across its (digital) radio services platforms is a crucial part of its overall radio strategy. We have explained further our supportive views in relation to the BBC in response to the DCMS BBC Charter Review consultation exercise (information is available on request, or on our website).
3. The BBC's obligation to extending the broad range of diverse music on offer to its audiences is welcome. The wide range of genres that are broadcast by the BBC services is vital for sustaining the diversity of music available on our airwaves.
4. Taken as a whole, BBC digital radio provides distinctive new programming services that are different from what is available elsewhere, so complementing commercial operators' offerings. We must not presume to rely on the output solely from commercial radio services, as these operators have proved their somewhat varied commitment to artists and creators; witness the narrowing of the repertoires regularly used by stations such as XFM and Jazz FM in recent years.
5. The BBC has a more impressive record of adhering to format guidelines than most of the commercial radio sector where many operators have been unable to uphold the same format requirement principles as consistently.
6. As explained in the BBC submission to the digital services review, digital radio is an important platform which enables a broad range of new artists and creators to be afforded with additional opportunities. We welcome this statement and the BBC's ambition in this area.
7. We support the innovative methods used by the BBC in bringing new talent to the new networks. The example of new recruitment methods to attract untapped talent, both on air and behind the scenes, is welcome. Such methods should be continued and expanded further.
8. We also support the BBC's ability to nurture the widest range of talent.
9. Live music, in particular, is a key constituent of radio services, and the BBC's digital platform should continue to give this feature the high profile which it deserves. For both established and aspiring artists, the opportunities afforded by the digital platforms are important. We would like to see the BBC's commitment to live music expanded.
10. As a general point, digital radio, is a growth sector, but requires the support of the BBC to drive digital penetration generally. As digital listening accelerates, it's important that the BBC retains a pivotal role in the process, in particular during these formative years. Furthermore, by virtue of increased digital penetration, the BBC's digital services will in turn provide support for the digital platform of commercial radio services. As explained by the Oliver and Ohlbaum report: "this overall boost to digital has an unambiguous positive impact on the commercial sector as a whole".