

Ofcom consultation on its draft operating licence for the BBC's UK Public Services:

Response from Friends of Radio 3, regarding the proposed requirements for Radio 3

Key points:

- We cannot see, in the case of Radio 3, that the government's directive, which has been duly acted upon by Ofcom, does much to achieve its stated purpose – ensuring distinctive BBC output
- The key elements which make Radio 3 distinctive are not recognised
- There is an over-reliance on numerical quotas which disguise the true picture regarding Radio 3's musical output
- About 30% of the distinctive live/specially recorded musical output is between the hours of 00.30 and 06.30, when most listeners are asleep
- Radio 3 is at its least distinctive (and most like Classic FM) between the hours of 06.30 and 12.00, peaktime for both stations

In addition:

- The BBC has marginalised classical musical performance by largely limiting it to Radio 3: there is scope for coverage of "classical" music, in various appropriate guises, on other services, especially on radio
- Proms coverage on the mainstream BBC One and Two has all but disappeared and there are few classical performances on BBC Four outside the Proms season
- The wider BBC should do more to foster less popular PSB output, especially the arts

Richard Ellis & Sarah Spilsbury
Friends of Radio 3
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friendsofradio3@for3.org
www.for3.org

As Ofcom considers it likely that it will amend the operating licence at intervals, we respond here to the draft proposals so far published, but with additional comments which might at some time in the future become more relevant. Ofcom's responsibilities include:

*'... in particular, in the first operating licence we are required **to seek to increase the current requirements set by the BBC Trust to secure the provision of more distinctive output and services**'¹*

These service requirements are the equivalent of the Trust's 'conditions' as updated in succeeding service licences from 2006/07 onwards. Compared with the Trust's statement of Radio 3's **key characteristics** the government's résumé of Radio 3 – which Ofcom follows – is, in our view, an inadequate starting-point:

*Radio 3: a service centred on classical music, alongside other music and art forms and speech output, and with a strong focus on live and specially recorded music.*²

This is vague and does not indicate where Radio 3's distinctiveness lies. If this present exercise is about ensuring **distinctive BBC output**, it seems a poor start to make no mention of content areas which are particularly distinctive. 'Other music and art forms'? Why no mention of the specialist jazz (Radio 3's jazz audience is not like Radio 2's)? Or world music? Or drama (which is not like Radio 4's)? Why no requirement for new drama productions, which was one of the Trust conditions?

These are the areas which distinguish Radio 3 from Classic FM and, where there is overlap, from any other service. Given the regular complaints a few years back – from RadioCentre, from Classic FM and also from us – that Radio 3 was using, particularly, the morning output to compete with Classic FM, how is this to be prevented in the future?

Under the current régime we have no apprehensions about Radio 3 but would be unhappy if BBC managers were left to manipulate output to align with inappropriate BBC strategies and disproportionate spending cuts. These are the aspects that need outside oversight, not redundant tinkering with minor 'requirements'. The network regularly exceeds its commitments by such a wide margin that increasing the requirements by such small amounts affords leeway to do **far less** than at present - the reverse of the intention.

Requirements of Radio 3:

In considering the individual requirements, two items are of relevance to the government and the BBC but are less so to listeners:

- a) *News intervals throughout the day:* Radio 3 has these. In the recent past, the news headlines were increased to every 15 minutes during the early morning peaktime

¹ *Draft operating licence for the BBC's UK Public Services*, Ofcom, March 2017, p. 1 § 1.3.

² *An Agreement Between Her Majesty's Secretary of State for Culture, Media and Sport and the British Broadcasting Corporation*, December 2016, 2. Existing services (2) (d) p 50.

programme. We saw this as a tactical move to discourage listeners from switching to Radio 4 for their news; however, the frequent bulletins were unpopular because, together with regular programme trails and sundry announcements, they constantly disrupted the music and prevented longer works from being played. They have been dropped by the new controller, as have other features also designed to appeal to a broader audience. There are still news bulletins every half-hour during the breakfast programme and thereafter between various programmes during the day.

b) *Annual quota for relevant expenditure incurred outside the M25 area (40%).* No increase on the latest service licence. Not of interest to listeners.

The increased requirements of interest to listeners (the Trust's current requirements are in brackets) are that in respect of Radio 3, the BBC must ensure that annually:

- a) *at least 45% of the station's music output consists of live or specially recorded music (40%);*
- b) *it broadcasts at least 440 live or specially recorded performances (400);*
- c) *it commissions at least 25 new musical works (excluding repeats) (20); and*
- d) *it broadcasts at least 35 new documentaries on arts and cultural topics (excluding repeats) (30).*

The effectiveness of these increases may be judged by comparing them with Radio 3's *Performance against Public Commitments* figures for 2015/16³, the most recent that we could find:

- a) *58% of music output live or specially recorded (commitment 40%, now 45%)*

The entire 6-hour sequence from 00.30 to 06.30 consists of EBU special radio recordings. That alone accounts for roughly 30% of music output. Daytime and evening programmes from 13.00 to about 22.00 are predominantly live or specially recorded, and there are also live jazz and world music sessions.

As far as distinctiveness is concerned, the **percentage** of live/specially recorded music is not the main criterion by which to judge. More important would be that the live/specially recorded music is broadcast overnight and during the lower-listening afternoons while at morning peaktime, 06.30 – 12.00, when Radio 3 is most likely to be competing with Classic FM, both stations are broadcasting presenter-led CD sequences. Peaktime is therefore when Radio 3 is **at its least distinctive**.

- b) *638 live or specially recorded performances broadcast (commitment 400, now 440)*

³ *BBC Full financial statements 2015/16, 'Performance against public commitments', p 114*

There is a live (or recorded) evening concert every night (c. 365 performances) and 5 lunchtime concerts per week (c. 260 performances, excluding repeats), over 600 performances in total.

- c) 44 new musical works (excl. repeats) commissioned (commitment 20, now 25)

The numerical quota is not the most useful measure for new commissions, since a new work could be anything from three minutes to thirty minutes or longer⁴ and by established composers or very young professionals. There must be a better way of measuring performance here. What does “excluding repeats” mean? Does the requirement refer to **commissions** or **broadcasts**? How can you repeat a commission?

- d) 50 new arts/cultural documentaries, excl. repeats (commitment 30, now 35)

The Sunday Feature alone is, barring accidents, broadcast every Sunday (accounting for c. 50 arts/cultural documentaries).

Drama:

However, our principal concern relates to the omission of any mention of Radio 3’s drama output: no increase in the requirement set by the BBC Trust for new productions (current 20, previously 35), nor is drama mentioned either in the government’s station overview or in Ofcom’s proposals.

Distinctive drama has always been a fundamental part of Radio 3’s remit. The network is now the *only* BBC service which regularly broadcasts long-form (90 minutes minimum) classic and contemporary plays, especially ‘theatre’.⁵ BBC television has no long-form drama of this kind; Radio 4 predominantly focuses on short-form ‘written-for-radio’ plays and classic serial adaptations. It doesn’t – and, lacking the scheduling flexibility, wouldn’t – broadcast the kind of drama which is on Radio 3, **week in, week out**.⁶

⁴ A recent Radio 3 world premiere lasted eight hours.

⁵ The *BBC Annual Report and Accounts, 2008/09*, p. 52, stated: “In another wide-ranging year for drama, we broadcast over 40 new productions, including works by Racine, Marlowe, Lorca and Lampedusa, as well as contemporary drama about Piper Alpha, the Good Friday agreement and the 7/7 bombings.”

⁶ Drama on 3 broadcasts in the past 6 months have included:

Macbeth – Shakespeare (2 hours)

Iphigenia in Crimea, verse drama after Euripides by Tony Harrison (1 hour 30 mins)

Richard II – Shakespeare (2 hours 15 mins, first recording of a Shakespeare play in binaural sound)

Pericles – Shakespeare/Wilkins? (2 hours)

A Streetcar Named Desire – Tennessee Williams (2 hours)

Œdipus the King: Sophocles/Burgess (1 hour 40 mins, first UK performance of Anthony Burgess's text)

The Government Inspector – Gogol (2 hours)

Andromache – Racine (1 hour 45 mins)

Rosmersholm – Ibsen (2 hours)

Manfred – poem by Lord Byron (1 hour 20 mins)

The Birthday Party – Harold Pinter (1 hour 40 mins)

A sequence of short radio plays by Samuel Beckett (2 hours)

Conclusions: Distinctiveness and Public Service Broadcasting

Distinctiveness:

The Government's directive to 'increase requirements' contributes little to the securing of distinctive output on Radio 3. Live classical music is at the centre of its output, but it is the mix with jazz,⁷ world music, drama, documentaries, 'special events' and a flexible schedule allowing works to be given 'the time they need'⁸ which makes Radio 3 distinctive.

Also, Radio 3 sets out to serve listeners who have particular enthusiasms. This doesn't mean they have or need any specialist knowledge: it means they are enthusiastic enough to want something more than 'just entertainment' which is how they would see Classic FM. They want to develop their enthusiasms and expand their knowledge of a subject which has proved interesting to them; and they are prepared to put some effort into it. They want more demanding content.

We accept that such radio listeners differ from most radio audiences, but they contribute to the network's distinctiveness because they encourage ambitious broadcasting and serious, adventurous listening. In our view this aspect is indispensable, whereas past attempts to make Radio 3 'accessible and welcoming' encroached on Classic FM's more popular territory.

The BBC and Public Service Broadcasting: off-topic generalities

If Radio 3's content is viewed as quintessentially PSB material, it's a shame the BBC manages most of the year to marginalise the musical performances, on Radio 3. The mainstream BBC services, especially radio, could be much more helpful in stimulating interest in potential new audiences – including the young – **with appropriate level programmes**. This is what the Trust was advocating.

⁷ A Radio 3 producer once said that the amount of jazz on the network 'depended entirely on the Controller's whim' (Humphrey Carpenter, *The Envy of the World*, London, 1996, p 326). We feel this is as it should be, with the one proviso that it should not be dropped entirely 'on the Controller's whim'.

⁸ On the recent Bank Holiday Monday afternoon, for example, the entire schedule was replaced by a 4-hour programme recording the natural sounds of a ramble along the Welsh borders and Offa's Dyke. Surprising, imaginative – and well received by listeners.

Is it no longer (as it was in 2011) considered a **BBC responsibility** to ‘deliver the great works of classical music and other musical genres to all audiences’; and that ‘other services are more effective [than Radio 3] in reaching these audiences and therefore can complement Radio 3’s delivery of this content’?⁹ Which other services are currently complementing Radio 3’s provision?

- What was the rationale for dropping both the introductory classical music programmes from Radio 2? Radio 2’s reach continues to rise (along with its budget/expenditure) but popularity is not the sole PSB measure of success.
- Why has the number of Proms concerts on BBC One and BBC Two now been reduced to the First and Last Nights only? Even the ‘light’ Proms (film music, popular music artists and musical shows) are now removed from BBC Two to BBC Four.
- Why is no contemporary ‘classical’ considered suitable for, say, Radio 1? If special ‘classical’ Proms can be devised for younger audiences (such as last year’s Steve Reich concerts in the Bold Tendencies Multi-Storey Car Park), why can there not be special radio programmes? If the Proms can include a David Bowie concert, why can Radio 6 Music not include an esoteric ‘classical’ programme?

Having Mary Anne Hobbs including the odd classical ‘track’ among the popular favourites is no more than tokenism. In short, take the music to the audiences rather than try to lure the new audiences over to Radio 3.

- Why no longer a classic ‘theatre’ slot on television? A single television programme reaches a much wider audience than a whole run in a provincial theatre. Audiences need to be trained.

These are areas which impact on the BBC’s public service obligations - especially education - and should not be dismissed as ‘matters for the BBC, not the BBC regulator’. The BBC is itself guilty of erecting the perceived ‘barriers’ to the classic arts by excluding

⁹ The BBC Trust’s service review for Radio 3, 2011, stated: “Radio 3 is the BBC’s flagship service for making **classical, jazz and world music** available to licence fee payers. We note, however, that it is not the sole responsibility of Radio 3 to deliver the great works of classical music and other musical genres to all audiences. The BBC has an overall responsibility for this and there are many services with a role to play in achieving this ambition.

“This is particularly the case because the nature of Radio 3 means that it struggles to reach certain audience groups, such as younger people, those from less well-off households, those living further away from London, and black and minority ethnic audiences. While we would welcome an increase in listening amongst these groups, other BBC services appeal much more strongly to them than Radio 3. Other services are more effective in reaching these audiences and therefore can complement Radio 3’s delivery of this content. We believe that a coordinated approach can make more impact and note the success that the BBC has had with its poetry and opera seasons, even though these did not result in increases in listening to Radio 3 itself.” *Service Review: BBC Radio 3, BBC Radio 4 & BBC Radio 7*, BBC Trust, 2011, pp 8-9.

performance broadcasts, other than popular music, from mainstream services: no concerts, apart from a handful of Proms once a year, no recitals, no classic drama. This is further driven home by, for instance, the online news coverage and magazine features which report popular culture stories, but seldom the classic arts.

In spite of the BBC Trust's admonition in 2011, no attempt was made to integrate appropriate level ('accessible') classical programmes into mainstream popular services, presumably because it's feared that these programmes wouldn't attract the mass audience and would depress viewing or listening figures. Radio 3 (with no digital sister station, unlike the four other network stations) has been expected to serve all audiences. Misguidedly in our view, it diluted its content in order to attract the 'broader audience' – with little result. Is the BBC genuinely 'promoting its Public Purposes' adequately, especially Purpose 2,¹⁰ given that Radio 3 cannot **on its own** be expected to serve satisfactorily all audiences of any age and all knowledge levels. We are pleased that Radio 3 appears now to be abandoning the strategy of trying to serve the broadest possible range of listeners and is returning to its former role.

Finally, we would welcome Ofcom proposing measures to ensure that:

a) Radio 3 is unable to dilute, in particular, its classical music content in order to appeal to a broader audience, in view of the adverse market impact on Classic FM¹¹ and the adverse cultural impact on its existing audience; and that:

b) the BBC makes the necessary effort to break down the barriers (which its own market strategy has helped to erect) by regularly *integrating* the classic arts and classical music into mainstream services.

A demanding Radio 3, albeit with a relatively small audience, is still needed if the BBC is to serve 'all audiences'. In the long-run, BBC-wide policies can grow Radio 3's audience more effectively than its own strategies could. But is the will there?

¹⁰ **'To support learning for people of all ages:** the BBC should help everyone learn about different subjects in ways they will find accessible, engaging, inspiring and challenging. The BBC should provide specialist educational content to help support learning for children and teenagers across the United Kingdom. It should encourage people to explore new subjects and participate in new activities through partnerships with educational, sporting and cultural institutions.' *Royal Charter for the Continuance of the BBC*, December 2016, §6The Public Purposes, subsection (2).

¹¹ 'The BBC must have particular regard to the effects of its activities on competition in the United Kingdom [...] In complying with this article, the BBC must [...] seek to avoid adverse impacts on competition which are not necessary for the effective fulfilment of the Mission and the promotion of the Public Purposes ...' *Royal Charter for the Continuance of the BBC*, December 2016, §11 Market Impact, subsections (1) and (2). It is not necessary for Radio 3, Classic FM's competitor, to alter its own content when mainstream services could include programmes for the mainstream audiences.