

Title:

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

Classic FM

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Do you agree with amending Rule 11 of the PPRB Rules and Section Six of the Code by inserting the proposed wording set out in paragraph 3.19 above? If you do not agree with this approach, please explain why and, if appropriate, suggest alternative wording.:

Question 2: Do you agree with amending Rules 10 of the PPRB Rules by inserting the proposed wording set out in paragraph 3.31 above? If you do not

agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

Question 3: Do you agree with amending Rule 9 of the PPRB Rules by inserting the proposed wording set out in paragraph 3.40 above? If you do not agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

Question 4: Do you agree with amending Rules 7 to 9 of the PPRB Rules by inserting the proposed wording, including new Rule 9A, set out in paragraph 3.51 above? If you do not agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

Question 5: Do you agree with either Option (A) or Option (B) in relation to inserting new Rules 17A and 17B, as set out in paragraph 3.68 above? If you do not agree with either of the proposed options, please explain why and, if appropriate, suggest alternative wording.:

Question 6 : a) Do you agree with the 'one sixth' threshold set out in Rule 13 of the PPRB Rules? If you do not agree with the threshold, please explain why, and, if appropriate, suggest an alternative.:

The one-sixth threshold has been helpful to date in weeding out extreme, single interest parties who may wish to use PEBs simply as a tool for spreading a particular message. We would certainly not advocate its removal and would support the raising of the threshold to 'one third' to ensure PEBs are only allocated to parties that are serious contenders with a genuine interest in being elected.

Any lowering of the threshold would lead to an increase in PEBs overall - and the research available for the 2001(1) and 2005(2) elections indicates there is no appetite for this from the public. It would also lead to an increase in PEBs being broadcast on behalf of smaller parties that the majority of listeners won't be able to vote for in their constituency.

(1) Election 2001. Viewers' Response to the Television Coverage. An ITC Research Publication

(2) Viewers and Voters: Attitudes to television coverage of the 2005 General Election

Question 6 : b) Do you agree with amending Rules 12 14 and 17 of the PPRB Rules by inserting the proposed wording, including new Rule 13A, set out in paragraph 3.83 above? If you do not agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

Question 7: Do you agree with: a) Any of the Options (C1), (C2), (D1) or (D2) in relation to amending Rule 20 of the PPRB Rules in relation to television, by inserting the proposed wording as set out in paragraph 3.93 above? :

Question 7: Do you agree with: b) Either Option (E1) or Option (E2) in relation to amending Rule 20 of the PPRB Rules in relation to radio, by inserting the proposed wording as set out in paragraph 3.93 above. If you do not agree with any of the proposed options, please explain why, and, if appropriate, suggest alternative wordin:

We do not agree with either Option (E1) or Option (E2).

As previously stated in our representations to the Electoral Commission, we propose a series of short PEBs of 40" in length rotated evenly throughout the schedule to achieve impartiality. This would enable political parties to focus their policies in a bite-sized fashion without the risk of listeners simply switching to another station.

Our suggested new wording is therefore as follows:
For radio, the length of broadcasts must be 40" in length.

In no event should commercial radio's broadcasts be allowed to increase in length or exceed that of the BBC, which we understand is broadcasting PEBs at a maximum of 1'30".

Background

In 2001 and 2005 respectively, the ITC(1) and Ofcom(2) produced research to examine television audiences' attitudes to election broadcasting. The 2001 research revealed 56% of viewers switched over or switched off to avoid PEBs and 44% had felt they were 'too long'. In 2005, 60% of viewers said they wanted the length to be reduced.

While there is no equivalent recent data relating to the impact and attitudes to PEBs broadcast on radio, the evidence suggests a much lower audience expectation and acceptance of PEBs on radio than on TV. The material available from the 2001 and 2005 post-election analyses seems to indicate radio is not in any way comparable to television as a source of political information. For example, in 2001 41% claimed television was their key source, whilst only 10% cited radio as such. In 2005 51% pre and 52% post election similarly mentioned television as their primary source. It is unlikely, therefore, that listeners tune into radio, and classical music radio in particular, with the expectation or want of hearing a political message. If lengthy or scheduled incorrectly they will prove to be nothing more than an unwanted intrusion, leading to the mutually detrimental process of listeners switching over or off.

It is also noteworthy that a similar analysis does not seem to have been undertaken for the 2010 general election. The media landscape has evolved quite considerably since 2005; in particular websites such as Twitter and Facebook have seen a meteoric rise in use as a marketing tool both commercially and politically. Viewers and listeners may now be more receptive to briefer, more impactful messaging in line with that of social media - shorter broadcasts would be more reflective of this current trend.

Media consumption has also changed generally since the 2005 election - for example, Ofcom's own research(3) shows use of internet, on any device, has risen from 59% in 2005 to 79% in 2011. There has also been an overall increase in the use of the internet to look at political/campaign/issues websites (19% in 2005, 27% in 2011). It seems likely that viewers

and listeners now expect to receive their information from a range of sources and may rely less on party political broadcasting.

We are aware that the BBC is broadcasting radio PEBs at a maximum length of 1'30" and, in fact, ran no PEBs during the 2010 election. Not only does it appear we are already at a commercial disadvantage in respect of the lost airtime and potential loss of listeners, but the apparent absence of complaint from listeners or parties following this points yet again to a lack of interest and value in political broadcasts on radio.

With the current wording, parties and designated organisations will feel compelled to pick a more lengthy broadcast in order to maximize their broadcasting time against the other parties. The option to maintain the impact but with shorter, cheaper to produce broadcasts will no doubt be welcomed. The Electoral Commission's report(4) itself stated 'many parties would like the opportunity to have even shorter broadcasts, noting that short and oft-repeated messages are considered most effective by the advertising industry'. We believe, therefore, our proposed amendments will provide a mutually beneficial solution for commercial radio and parties/designated organisations.

We would also like to note that, beyond the inconvenience mentioned by one respondent in having to re-edit broadcasts to match television, there is no evidence to suggest that increasing the maximum length of PEB broadcasts would be beneficial to either party and, in fact, the data available appear to suggest the opposite. Until such time that we see research relating to the impact and consumption of PEBs on radio we object strongly to option E2 and will appeal against any notion to change it to such.

(1) Election 2001. Viewers' Response to the Television Coverage. An ITC Research Publication

(2) Viewers and Voters: Attitudes to television coverage of the 2005 General Election

(3) Ofcom: Adults' media use and attitudes report

(4) Electoral Commission: Party Political Broadcasting. Report and recommendations

Question 8: Do you agree with the scheduling requirements set out in Rules 21 and 22 of the PPRB Rules? Please give reasons for your response.:

We do not agree with the current scheduling requirements and would like the wording amended as follows:

UK referendum broadcasts and PEBs before a General Election must be carried on UK-wide analogue radio services between 6am and midnight.

As mentioned in our response to question 7, there is no evidence to suggest that listeners are engaging in or digesting PEBs on radio. Running them at peak time may reach a larger audience, but this is unlikely to have the required impact if viewed as an unwanted interruption in programming. Additionally, if listeners are switching off/switching over the audience reached will be diminished considerably and may actually reach fewer people.

Relaxing the rules as above will enable us to schedule PEBs appropriately to match the expectations of our audience at a particular time. It is of little benefit to either party if listeners view the PEBs at an annoyance.

Question 9: Do you agree with amending Rules 9 and 18 by inserting the proposed wording set out in paragraph 3.101 above? If you do not agree with this approach please explain why and, if appropriate, suggest alternative wording.:

Question 10: Do you agree with amending Rules 8, 9 and 19 by inserting the proposed wording set out in paragraph 3.110 above? If you do not agree with this approach, please explain why and, if appropriate, suggest alternative wording.:

Question 11: Are there any other issues arising from the PPRB Rules, not already covered, which you wish to raise?:

Question 12: a) Are the provisions of the Proposed Code Guidance set out above appropriate?:

Question 12: b) If you do not agree that any provisions of the Proposed Code Guidance are appropriate, please explain why and suggest alternative wording: