RadioCentre’s response to the BBC Trust’s service licence review of Asian Network

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1. **Introduction**

1.1 RadioCentre is the industry body for UK commercial radio. It exists to maintain and build a strong and successful commercial radio industry, and to help promote the value and diversity of commercial radio.

1.2 RadioCentre has consulted with a wide range of Asian commercial radio stations and industry leaders whose comments are reflected in this response. This response should be considered by the Trust in conjunction with the RadioCentre response to BBC Local Radio service licence review and the response to the overall Delivering Quality First consultation (DQF).

2. **Executive Summary**

2.1 The BBC must consider the best and most efficient way to provide distinctive content for the Asian community in the context of both Delivering Quality First and this service licence review.

2.2 However, RadioCentre questions whether the BBC Executive’s ultimate decision to retain Asian Network with much of its most distinctive content removed will deliver sufficient public value for licence fee payers.

2.3 We are concerned that format changes proposed by the DQF strategy will remove quality programming and result in a reduction in the distinctiveness of the service. RadioCentre believes that a number of these proposals are a significant change and should therefore subject to a Public Value Test.

2.4 The current service licence coupled with an ill-defined editorial direction has left Asian Network trying to do too much, appeal to too many, without a clear remit to reaching the intended audience. RadioCentre strongly supports the Trust’s efforts to focus on areas where the station adds most value and is truly distinctive, such as eyewitness reportage; international newsgathering; specialist analysis and explanation; investigative journalism; and current affairs.

2.5 The station should seek to do more to make the most of its already established links with BBC News and World Service. World class speech content is exactly what the BBC should deliver to meet public value commitments. Asian Network should continue its commitment to drama, documentary and distinct minority language programming as the commercial sector cannot be expected to fulfil this gap.

2.6 The proposal to expand the audience from the 15-35 demographic cannot be planned without fully examining the potential market impact. RadioCentre would suggest that the BBC concentrates on developing the synchronicity between its youth audience as a driver between Radio 1, 1Extra and Asian Network. More should also be done to expose new British Asian music to the range of listeners under 35 years old.

2.7 RadioCentre believes that changes proposed in the DQF programme do not allow the station to fulfil the objectives and meet the conditions of its service licence.
3. **Background**

3.1 The BBC started to produce specific local speech, music and news content aimed to appeal to British Asians from around 1977, when this originally consisted of single programmes on Local Radio and Radio 4. By 1996 it launched a standalone station named Asian Network and established as a 24 hour regional station on AM. The full re-launch of Asian Network on the national DAB multiplex took place in October 2002 when the BBC consolidated Asian programming into one national station. Through a wide range of music, drama, news and language programming, Asian Network helped the BBC expand its reach to meet the needs of an under-served audience.

3.2 The repositioning of Asian Network meant that the BBC had taken its public service remit into a new sphere, implicitly acknowledging the success achieved by Asian commercial radio market and in particular, Sunrise Radio. As the largest quasi-national station, Sunrise had achieved significant market share and reach in London and regional outposts in Birmingham, Yorkshire and Leicester since 1996.

3.3 The BBC’s decision to re-launch regional Asian programming broadcasting from Leicester and Birmingham was criticised at the time as the BBC’s attempt to encroach into largely successful commercial market. Despite major investment, programming changes and rebranding over the past 5 years, Asian Network has failed to attract more than a quarter of the approximately 2 million Asian adults who listen to the radio each week (this currently stands at 436,000). The reach of Asian Network is proportionately lower than that of other BBC stations and its weekly reach effectively peaked in 2005 at 524,000 listeners but declined by over a third in the subsequent years.

3.4 By 2010 the BBC Executive acknowledged the increasing diversity of the station’s intended audience of British Asians and extended its remit to those interested in Asian culture. The Executive acknowledged that continuing on such a high the cost per listener was not a viable option for a national station which failed to meet expected listening figures.

   *The BBC therefore proposes that the Trust considers closing the Asian Network as a national service, exploring a number of options for redeploying its investment and meeting the needs of Asian audiences more effectively. One option is to replace it with a network of five part-time local services with some syndicated national Asian programmes.*

3.5 The BBC Trust reported back on the consultation results and stated that they “will also consider carefully any formal proposal to close the Asian Network” as part of an overall radio strategy. By early 2011 the BBC Executive had postponed any decision to close Asian Network into the DQF consultation.

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1 BBC Annual Report and Accounts 2000/2001 p.13
2 Rajar, Q3 2011
3 BBC Executive’s proposals of February 2010
4 *Putting Quality First*, December 2010, BBC Trust p.12
3.6 **RadioCentre questions whether the BBC Executive’s ultimate decision to retain Asian Network was based on the station’s viability and public value for licence fee payers.** We supported the BBC’s aspiration for the service licence to “do fewer things better”, including the closure of Asian Network as a national service, and using the resources released to serve Asian audiences better in other ways. In particular, we believe that the BBC may be able to reach Asian audiences more effectively by providing more clearly delineated slots on BBC Local Radio for the Asian community, or integrating it within national networks.

- **Audience profile**

3.7 The need to serve a young British Asian audience is vital service of public value. However, this should not be misconstrued as chasing an audience that is already well served by youth services such as R1 and 1 Extra (and the commercial sector). The Trust has acknowledged the challenges in attracting ethnically diverse youth audiences in their Service Review: Younger Audiences in 2009

Radio 1’s reach is much lower among young ethnic minorities and has fallen significantly since 2003. We believe this is due to a variety of reasons, including the growth in reach to newer BBC services, such as 1Xtra and the BBC Asian Network.

3.8 Asian Network delivers the largest number of Asian adult listeners over 15 years old – closely followed by Radio 1. In this respect Asian Network is succeeding in meeting expectations for the BBC to make headway in reaching under-served audiences. However, Asian Networks’ overall performance in Rajar demonstrates fluctuating reach and limited incremental audience, with less than 76,000 people across the UK being solus listeners who only listen to Asian Network (0.1% of overall radio listeners).

- **Reach**

3.9 BBC Asian Network’s weekly reach has only recently got close to reaching its peak of 524,000 – this is widely considered (at least in part) to be as a response to the threat of closure and subsequent increase in awareness. The Rajar figures since the threat of closure in 2010 have improved significantly. By quarter 3 of 2011 it had risen to weekly reach of 507,000 listeners for the station; a similar trend as 6 Music saw whose audience grew after the threat of closure.

3.10 However, Asian Network’s performance is still relatively poor given its potential audience of around 2 million Asian radio listeners (plus those with an interest in Asian Culture). When comparing to the largest commercial competitor Sunrise Radio, it should also be noted that their TSA is much smaller. Sunrise is only available on AM, and DAB in Greater London, on DAB and FM in the Midlands and Scotland. The graph below demonstrates the Asian Network’s performance mapped against Sunrise Radio Total Reach in 000s.

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5 Service Review: Younger Audiences, 2009 p.9
3.11 The Asian radio market is well catered for by the commercial sector with a large number of regional stations targeting the same demographic (and complementing the growing number of community stations). Similar music offerings and playlists are available through the wide range of commercial Asian radio stations.

3.12 While much of Asian Network is distinctive, it has a significant degree of overlap with individual commercial stations. Overall Asian Network listeners are more likely to listen to commercial radio (63.4%) than other BBC stations (52.2%). Whereas 19.8% of listeners to Sunrise Radio also listen to Asian Network; 25.1% of listeners to Buzz Asia also listen to Asian Network; and 23.5% listeners to Kismat Radio (Greater London) also listen to Asian Network. In each case this is a higher level of duplication than with any other station.

3.13 However, the value the BBC brings to the Asian radio market is well appreciated. RadioCentre recognises that the BBC provides the only station that attempts to encompass a large range of music, culture, language, news, documentaries and current affairs that cover British Asian culture from an accessible perspective as a distinct part of the BBC’s main radio offerings.

3.14 The BBC’s role as a public service broadcaster has attempted to give recognition to British Asian culture as a vital part of the mainstream, and reason for the initial investment and national roll out. However, in the 10 years since its national launch, between several proposals from the Trust and Executive to improve the station’s performance, the public have financially supported a failing national station that is not reaching its full potential. This approach has left Asian Network trying to do too much and appeal to too many, without a clear remit and route to reaching the intended audience.
3.15 Asian Network represents only a small proportion of the BBC’s radio output and only reaches 0.3% of its TSA\(^6\). The service licence for Asian Network therefore does not fundamentally address what should be the most appropriate size and attainable shape for a BBC Radio offering.

- **Competitive Impact and Fair Trading**

3.16 In 2011 Asian Network sponsored a number of live events, including; the London Mela with a partnership with Radio 1 for the ‘R1 Introducing’ Tent, the ‘Asian Network Mix’ Tent and full sponsorship of the Main Stage. This was in addition to Leicester, Cardiff, Manchester and Newcastle Melas. Asian Network also had live broadcast presence at religious Melas to showcase a range of celebrations across the country with the Dashehra Diwali Mela, Birmingham Eid Mela and Baiaskhi Mela.

3.17 These diverse outdoor events demonstrate how Asian Network can support the principles of public value by bringing media attention to the breadth of British Asian culture. However Asian Network’s dominance of these events brings into question the value that the BBC places on sponsorship. Moreover it should be noted that no other broadcasters have had the opportunity to sponsor the London Mela since Asian Network took over the contract in 2006.

3.18 Commercial stations in this position would have sought advertisers and local businesses to sponsor aspects of the Mela through the selling of radio spots and advertisements. It understandable that commercial radio has made the case that Asian Network’s behaviour as a sponsor has impacted directly on this unique market and are now priced out by the BBC’s presence. **The cost of sponsorship and market impact of Asian Network’s participation in large events on the already narrow margins of the Asian media market should be considered by the Trust.**

3.19 Asian Network also should be aware of its public service role and exercise caution when apparently endorsing commercial products. Content on Asian Network, like all BBC services, should always be impartial, accurate and avoid unnecessary commercial references. “**We must not endorse or appear to endorse any other organisation, its products, activities, services, views or opinion or give undue prominence to commercial products or services**”\(^7\).

3.20 We recognise that the BBC Trust is not strictly the BBC’s regulator. However, in the absence of effective regulatory oversight of the BBC, we believe that the BBC Trust should more closely monitor all BBC output, and undertake an investigation if it believes that a breach of BBC guidelines may have occurred. This could take the form of the regular spot-check monitoring that Ofcom undertakes. **Asian Network should be aware of its public service role and exercise caution when apparently endorsing commercial products**

4. **Service Overview**

4.1 In recent years Asian Network has retained the ability to offer a very broad service, which has been allowed to shift and evolve even since the formal introduction of its first service licence in

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\(^6\) Rajar Q3 Sept 2011

\(^7\) BBC Editorial Guidelines, section 14.4.4
2008. The current service licence has six conditions which Asian Network's performance is measured against.

4.2 **Sustaining citizenship and civil society – (Speech content)** Asian Network is tasked with meeting the service licence condition to deliver a 50/50 split of speech and music. The BBC delivers acclaimed speech content across the network and Asian Network is no exception, with two Sony Radio Academy Awards in 2009 for Best Speech Programme for Nihal's afternoon show and the Bronze Award for the Asian Network Reports: Passport to Murder News Special. The awards demonstrate how the station succeeds in this field and is recognised as providing engaging, current and appealing speech content. **RadioCentre believes that world class speech content is exactly what the BBC should be delivering within a broad range of subjects to meet its public service obligation.**

4.3 **Stimulating creativity and cultural excellence – (Music)** Asian Network has commitments with regards to music and culture; it should cover a wide range of genres with an emphasis on new music and British Asian artists, and on nurturing and developing new acts. The music-led programming on Asian Network is both cutting edge and award winning; shows like Bobby Friction have a key role to promote new music talent and music styles that are key to targeting the under 35 audience. However, because of the crossover with Radio 1, late night shows such as Bobby Friction’s (which originated on Radio 1) may find a more natural home on R1 or 1Xtra to complement their youth appeal. **RadioCentre questions the relationship between ‘youth’ music programming and Asian Networks average listener age, which currently stands at 34.** **RadioCentre believes more should be done to nurture talent, develop and support new British Asian music to appeal to the range of listeners under 35.**

4.4 **Drama:** The BBC have attempted to find a successful model of drama that appeals to their target audience; soap opera Silver Street was first broadcast in 2004 with storylines related to issues that affect the daily lives of British South Asians and their neighbours. However, audience figures dwindled and by November 2009 the BBC announced that they would be cancelling Silver Street. The current drama offering on the channel is *Asian Network Presents*… is a 30 minute drama production aired once a month. “Committed to providing distinctive, original and impactful content, all relevant to the target audience”

8 **RadioCentre believes that Asian Network should continue its commitment to drama and renew its approach to developing new talent through this approach.**

4.5 **Reflecting the UK’s nations, regions and communities – (Language)** The current service licence conditions mean that Asian Network should broadcast an average of three to five hours of language programming every day. Asian Network has recently cut an hour from its weekday language shows. The hours of 18:30 and 22:00 are meant to be dedicated language content with the Gagan Grewal show in a hybrid of English, Hindi and Urdu, followed by regional language shows at 20:00 in Punjabi, Mirpuri, Gujarati and Bengali.

4.6 These reductions take the language content down to an hour a day in weekdays and up to 8 hours of Punjabi, Mirpuri, Gujarati and Bengali on Sunday. Distinctive minority language programming is not easily replicable by the commercial radio. This change leaves the amount of

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distinctive content barely recognisable from the original service licence. RadioCentre believes the current provision for minority languages is inadequate and dilutes the public value of the service.

4.7 Bringing the UK to the world and the world to the UK - News and current affairs content: Asian Network is meeting the condition of its service licence to foster debate and share knowledge with people around the world through phone-ins and guests from other countries, as well as through its online communities. The station regularly connects with communities around the world, particularly in the Indian subcontinent, to help British Asians connect with their roots.

4.8 The BBC has access to one of the largest and most respected newsgathering operations in the world. We understand that it has around 8,000 journalists and other news staff across the UK and overseas, and it is right to outline an aspiration to provide the ‘best journalism in the world’. RadioCentre strongly supports Asian Network’s efforts to use this position to focus increasingly on areas where it adds most value and is truly distinctive, such as eyewitness reportage; international newsgathering; specialist analysis and explanation; investigative journalism; and current affairs.

4.9 RadioCentre believes that Asian Network should seek to do much more to make the most of its already established links with BBC News and World Service. If the station is looking for more accessible content rather than a schedule dominated only by harder news issues during the daytime schedule, we suggest it should showcase more local content. This would be more consistent with the Trust’s view that ‘the BBC must resonate better with local communities and be better at reflecting local communities back to the UK as a whole’ than a more London-centric approach.

5. The future of Asian Network

5.1 In responding to the DQF proposals within the context of this response, we urge the BBC to provide value for money and meet the conditions of its service licence. However we are mindful that the Trust must ensure that Asian Network is providing a public service that is distinct from the commercial sector whilst cutting a significant proportion of its content budget (with a reduction of 34% being proposed).

5.2 Asian Network is both the most expensive station per listener hour and the one least appreciated by its listeners. RadioCentre recommends a more streamlined Asian Network with a continued commitment to offerings distinct from the commercial sector. Distinct documentaries and current affairs programmes specific to the audience provide the best demonstration of public value.

5.3 RadioCentre is concerned that Asian Network has not managed to reach its potential audience through a combination of factors: an overly ambitious remit which attempts to serve a broad diverse audience, coupled with a large market impact that has led to fierce competition with

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9 BBC Trust, Strategy Review, p.25
10 BBC Trust, Strategy Review, Supporting Analysis, p.27
11 BBC Audience Information, July-September 2011
successful commercial stations over talent and broadcast content and an ill-defined focus that has led to confusion over its core purpose and distinctive role.

5.4 The difficulty for the BBC remains how it can provide a cost-efficient service whilst retaining and distinctiveness from the commercial Asian radio sector. The use of light entertainment content to fill the cuts to drama and documentaries will undoubtedly lean towards a commercial model. This would be the worst outcome of cuts to the service, both in terms of the diversity of the UK radio market and licence fee payers. RadioCentre believes that this must be distinctive enough from its competitors to demonstrate public value. Our specific response to the BBC management’s proposed changes to Asian Network are outlined below:

5.5 **Maintain Asian Network as a national service**: RadioCentre continues to question the viability of retaining the station when the executive had proposed to close the station 2 years ago. The Trust have not fully explored the viability of continuing to meet the needs of the audience by incorporating the most valuable content back into the BBC’s existing radio services. RadioCentre believes that this option may still deliver the most distinctive and valuable content.

5.6 Currently, the BBC Asian Network operates from Birmingham, London and Leicester. It has been proposed that Asian Network will stop broadcasting from Leicester and the station’s main output will come from Birmingham’s Mailbox studios and the news team will be shifted to BBC News’ London studios by April 2013. RadioCentre acknowledges that this proposal aim to reduce back-office and location overheads in line with cost saving initiatives in the DQF document, but appears to fall short of exploring how else this expertise can be deployed.

5.7 **Broaden the existing audience to encompass British Asian listeners between 25 and 45**: The average age of an Asian Network listener is 34, and it seems an ambitious and unnecessary aim to extend this to 45. This audience is already well served; for example Sunrise Radio is the leading commercial station aimed at Asian listeners up to 55 years old, by targeting daytime content of mix of music, chat and phone-ins relevant to a wide range of listeners. Kismat Radio also operates successfully in this market as the UK’s only 24 hour Asian talk radio station aimed at an older audience of first generation Asians up to the age of 65. If this proposal is accepted we believe the Trust should consider this as a significant change and subject it to a Public Value Test. **RadioCentre believes that expanding the audience from the 15-35 demographic cannot be proposed in isolation without examining the potential impact on the commercial market.**

5.8 However ambitious this plan is to increase the age of the stations listeners, it is clear that this is not an easy task and will undoubtedly require a change in editorial direction for much of its most popular programming, particularly the award winning DJ shows aimed at urban Asian youth under 35.

5.9 In 2004 when DCMS undertook an independent review of the BBC’s digital offering, the BBC demonstrated the relationship between the Asian Network and Radio 1 in terms of appealing to a similar age range. It is worthwhile to note that 24.3% of Asian Network listeners are most likely to listen to Radio 1, yet in recent years the average listener age has crept up to an average of 34 years old. **RadioCentre would suggest that the BBC concentrates on developing the synchronicity between its youth audience as a driver between R1, 1Extra and Asian Network.**
5.10 **Asian Network should focus on six distinctive content areas: BBC news, music and entertainment, Asian culture, discussion, languages and specialist music:** We agree with the assertion that the editorial content of the station has expanded indefinitely outwards to encompass all types of entertainment speech radio, rather than strictly in line with Asian Network’s public purposes. The focus on talk, phone-ins, music and entertainment may require even further expansion to target the wider age range proposed.

5.11 RadioCentre is concerned that these broader content types are the successful editorial elements of Asian commercial radio. Whereas the BBC has a wider array of resources to draw upon to produce distinct content, the commercial Asian radio market is small and under-resourced. In our view the growing lack of clear identity and public purpose regarding Asian Network’s mission and priorities will be further compounded if the BBC goes ahead with such broad changes proposed to expand daytime chat content and music offerings.

5.12 **Remove drama and documentary programmes from the station:** RadioCentre is concerned that by removing the distinct and high quality elements that BBC are renowned for, is likely to make the Asian Network more like its commercial competitors.

5.13 Asian Networks’ Special Reports provide quality investigations of key current affairs topics; specific content targeting at issues affecting British Asians and wider Asian issues on a worldwide scale. These programmes are widely acknowledged as exemplars of the BBC’s reputation for quality and distinctiveness. This is further compounded by the public value element that the BBC provides in such documentary programming that cannot be replicated by the commercial sector.

5.14 The most recent BBC Audience Information report has demonstrated that the Asian Network is the most distinctive service from the BBC, but still holds the lowest audience appreciation index of 76\(^{12}\). **RadioCentre believes that this proposal to remove world class aspects of quality programming will have a vast negative effect on the distinctiveness of the service.**

5.15 **Reduce the amount of weekday language programmes:** The current service licence conditions mean that Asian Network is licenced to broadcast three to five hours of language programming every day. Asian Network has recently cut an hour from its weekday regional language shows resulting in diluted language content less than an hour a day in weekdays.

5.16 As noted above, this proposal leaves the amount of distinctive language content barely recognisable from the original service licence. RadioCentre would like to see the station continue weekday broadcasts of distinct minority language programming as this provides significant public value, and the commercial sector is unlikely to be able to fill this gap in Asian programming. **This proposal will also constitute a significant change to the service licence and should be subject to a Public Value Test.**

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5.17 Close the station between midnight and 6am: Asian Network currently networks BBC 5 Live between 1am and 5am weekdays – RadioCentre would welcome further detail on what the BBC means when it says it will close the station fully during overnights and whether this means no content or broadcast music only.

5.18 RadioCentre believes that changes proposed in the DQF document will make it difficult for Asian Network to fulfil its most important objectives and meet the conditions of its service licence. As such we would recommend that the Trust carefully considers the long term viability of Asian Network.

6. Conclusions

6.1 RadioCentre urges the Trust to specifically consider if there are other approaches to cost savings that can ensure that Asian Network continues to meet the conditions of its service licence. Given that plans entail stripping back on the very qualities of the service that make it unique, such as documentaries, drama and interviews, which are also the most expensive to produce, the inherent danger is that the BBC will ultimately transform Asian Network into something akin to commercial offerings.

6.2 Our key recommendation would be for the station to do everything that it can to retain these public service elements of its output, which can make it distinctive and valuable station, even in the face of the efficiency savings the BBC is being required to make. If this proves too difficult to deliver then the BBC should not rule out more radical approaches, which may mean once again considering the viability of a standalone station and incorporating this content into other BBC networks.

Key points

- Asian Network must maintain the service with core programming. RadioCentre believes that this proposal to remove world class aspects of quality programming will have a vast negative effect on the distinctiveness of the service.
- The BBC must reduce commercial market impact by acknowledging Asian Networks audience and sticking to a remit which is achievable and consistent.
- RadioCentre would suggest that the BBC concentrates on developing the synchronicity between its youth audience as a driver between R1, 1Extra and Asian Network.
- Expanding the audience from the 15-35 demographic cannot be proposed in isolation without fully examining the potential market impact.
- We urge the Trust to fully explore the impact of changes to the service licence condition in a Public Value Test.
- RadioCentre strongly supports Asian Network’s efforts to use this position to focus increasingly on areas where it adds most value and is truly distinctive, such as eyewitness reportage; international newsgathering; specialist analysis and explanation; investigative journalism; and current affairs.
- RadioCentre believes that world class speech content and minority languages is exactly what the BBC should be delivering to meet its public service obligation.