

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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**SUBMISSION FROM VOICE OF THE LISTENER & VIEWER TO
THE OFCOM CALL FOR EVIDENCE: MARKET POSITION OF
BBC SOUNDS**

10 November 2020

About VLV

1. The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of public service broadcasting (PSB).

Comments in response to the Call for Evidence

2. VLV welcomes the opportunity to respond to this call for evidence in relation to the market position and impact of BBC Sounds.
3. In making this submission VLV is concerned that the societal and citizen benefits of BBC Sounds are fully taken into account when considering the market impact of BBC sounds.
4. While competition concerns need to inform broadcasting policy, the lack of regulation of on demand audio in the UK means that British citizens are provided with largely unregulated on demand audio. This issue has significant implications for society because of the growing impacts of disinformation. There is a real risk that on demand audio content, especially speech radio, could be contributing to disinformation and this could be detrimental to democracy in the UK and society as a whole.
5. The popularity of on demand audio has increased significantly in recent years as was highlighted in Ofcom's Media Nations Report 2019 which reported that around 7.1 million people in the UK were listening to podcasts each week - an increase of 24% over the preceding year and more than double over the preceding five years. Ofcom research also found that half of listeners joined the podcast wave in the last two years.¹
6. In its Media Nations 2020 Report Ofcom found that the popularity of on demand audio is particularly pronounced among younger adults. The Ofcom 2020 Media Nations report found that about a third (34%) of the online adults aged 16+ had listened to music streaming services, podcasts or audiobooks in the previous week but among those aged 16-34 this rose to 55% compared to 20% among those aged 55+.²
7. The BBC has developed BBC Sounds partly in response to Ofcom's repeated requests for the BBC to increase its appeal to the hard-to-reach younger audience. The development of the BBC Sounds platform has been successful in providing a range of content for licence fee payers in a way which is convenient for audiences. As well as providing the facility for audiences to listen to BBC radio output time-shifted, the BBC has also commissioned content specifically for the platform to appeal to a wider audience than traditionally listen to live radio. As the BBC said in its 2020

¹ <https://www.ofcom.org.uk/about-ofcom/latest/features-and-news/rise-of-podcasts>

² Ofcom *Media Nations 2020 Report*, page 40

Annual Report, 'To compete in a global tech-dominated marketplace, BBC Sounds must find a distinct space in the lives of our listeners. We believe it can do that by combining the best on-demand audio content with world-class live listening'³. The BBC has also committed to opening up Sounds for high quality non-BBC podcasts.

8. In light of the lack of regulation of high quality accurate on demand speech audio content in the UK, VLV believes that the BBC should be allowed to continue with its strategy to invest in the BBC Sounds platform in order to maintain and increase its reach among younger audiences and to bolster its delivery of the public purposes as set out in the BBC Charter.
9. VLV believes that the BBC should not be constrained from delivering content which informs and educates the UK population on BBC Sounds, because such content, unlike most on demand audio, is regulated according to the Broadcasting Act and additionally follows the BBC Editorial Guidelines which are more stringent than the Broadcasting Act.
10. Another reason for not constraining BBC Sounds is that the BBC maintains a high level of quality and this encourages other providers to maintain the quality of their content which is beneficial for citizens.

³ BBC Annual Report 2020, page 17