

# **Small-Scale DAB, Analogue Resilience, and the ‘Left Behind’ Cohort in UK Radio**

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## 1. Purpose and Scope

This paper provides an evidence-led assessment of the outcomes of the UK Small-Scale Digital Audio Broadcasting (SSDAB) programme, drawing on an independently compiled and verified dataset of analogue and digital radio services, cross-referenced with publicly available Ofcom and DCMS sources. It is intended to inform national policy deliberation on the future sustainability, plurality, and civic value of local and community radio.

The paper does not seek to relitigate the case for SSDAB as a technical or regulatory innovation. Rather, it examines whether SSDAB, as implemented, is capable of serving the full range of public-interest objectives originally associated with it, particularly in relation to community and small independent radio.

The central policy finding is that a substantial and structurally defined cohort of services will not be served by SSDAB or other low-cost digital distribution models. This 'left behind' cohort is overwhelmingly composed of community radio services, and presents a material risk to plurality and civic communications if analogue provision is allowed to erode by default.

The paper therefore argues for a dual-track policy settlement: continued development and refinement of SSDAB where viable, combined with an explicit commitment to maintain FM and AM licensing as an active and proportionate route for community and small independent services, within spectrum limitations.

## 2. Executive Summary

Small-Scale DAB has delivered a significant expansion of digital terrestrial broadcasting in the UK. It has enabled new services to launch, reduced barriers to digital entry for some providers, and increased overall diversity of audio content. Ofcom's own reporting characterises the programme as a success in rollout and participation terms.

However, an independently verified dataset of UK radio services reveals a persistent and consequential distributional imbalance between policy intent and observed outcomes. **Approximately one third of licensed FM and AM services have no presence on any DAB platform.** This cohort is overwhelmingly composed of community radio stations. In contrast, the majority of services carried exclusively on SSDAB are newly launched digital-only services, most of which are licensed as commercial DSP services rather than community digital services.

The implication is not that SSDAB has failed, but that it has evolved into a platform whose dominant use-case is new commercial entry and multi-area expansion rather than analogue migration for community and small independent broadcasters. As a result, **SSDAB cannot be relied upon as a comprehensive substitute for analogue provision.**

This finding has material policy consequences. Community radio represents the largest single category of local, place-based, participatory broadcasting in the UK. If a substantial proportion of this sector remains structurally excluded from digital terrestrial distribution, and if analogue provision is allowed to decline or close without replacement, the UK risks a long-term contraction in civic media capacity at local level.

A pragmatic policy response is therefore required. This should recognise the limits of SSDAB, maintain analogue FM and AM as viable and legitimate transmission routes where proportionate, and treat digital transition as differentiated rather than uniform across the sector.

### **3. Policy Context and Original Intent**

SSDAB emerged from a recognised policy problem. Hundreds of analogue radio services, particularly community and small commercial stations, were unable to access county-scale DAB multiplexes due to cost, capacity, or coverage mismatch. DCMS consultation materials from 2018 explicitly referenced a cohort of “around 400” analogue services lacking any realistic digital terrestrial pathway.

The stated objectives of SSDAB were to create a third tier of DAB provision, reduce transmission costs, enable more proportionate coverage, and widen access to digital broadcasting for smaller services. The subsequent legislative and regulatory framework established a distinct licensing regime for small-scale multiplexes and community digital sound programme services.

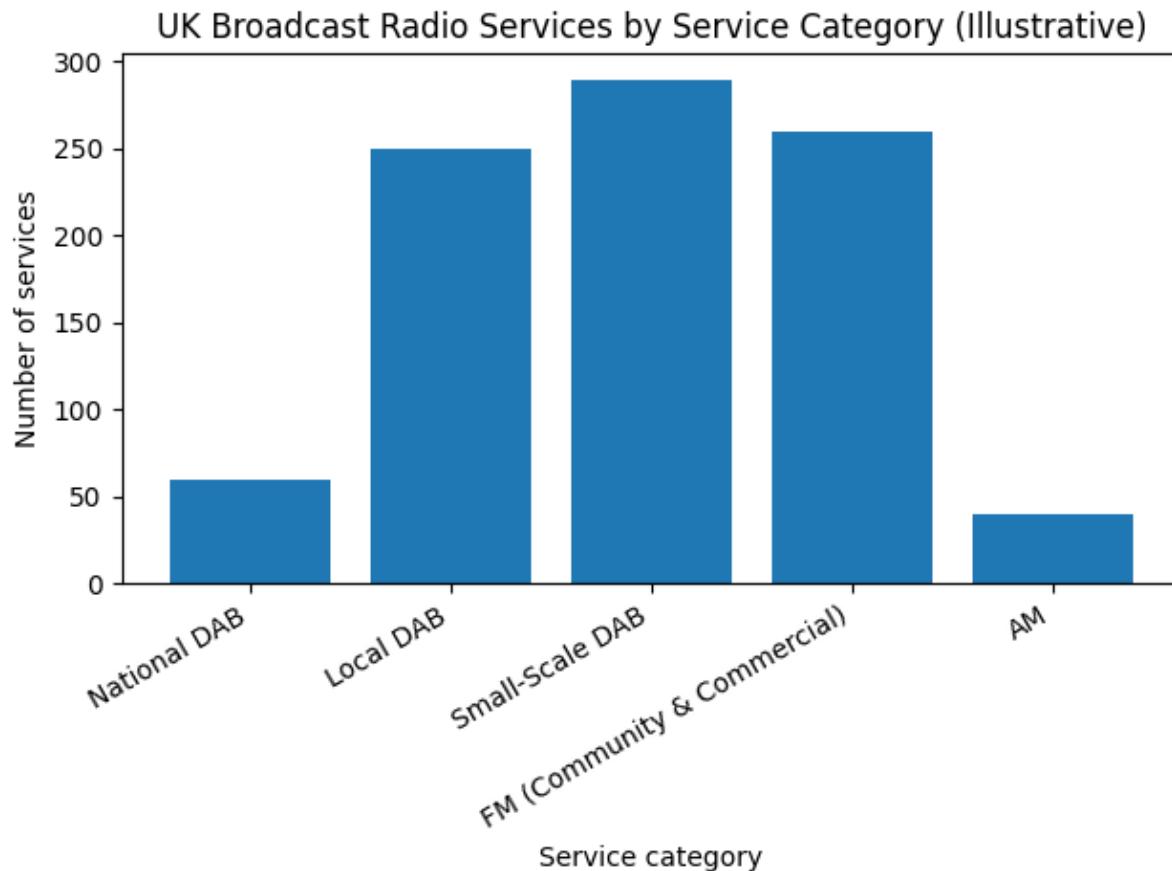
Two features of this framework are central to understanding subsequent outcomes. First, SSDAB was framed as a lower-cost, software-enabled alternative to conventional DAB infrastructure, but not as an FM-equivalent service in coverage terms. Second, regulatory constraints were deliberately introduced to maintain proportionality, including limits on overlap with existing local multiplex areas and modelling-based definitions of reasonable reception.

These design choices were rational and defensible. However, they also created structural conditions that shape which services can benefit from SSDAB in practice.

#### 4. Evidence From an Independently Verified Dataset

An independently compiled dataset was assembled by cross-referencing Ofcom licence records, published multiplex carriage information, and publicly available service data. The dataset categorises services by licence type, platform presence, and mode of distribution.

Table 1 Provision of DAB & Analogue Radio Services



This breakdown illustrates that UK radio is operating within a prolonged hybrid transmission environment rather than having completed a transition from analogue to digital broadcasting. Simulcasting between DAB and FM or AM remains the dominant model for BBC and commercial services, reflecting ongoing reliance on analogue platforms for reach, resilience, and audience access. At the same time, community radio services continue to depend disproportionately on FM transmission, with access to DAB developing unevenly and often at higher relative cost. These patterns suggest that regulatory and policy frameworks should account for the continued public value of analogue services alongside the expansion of digital capacity, rather than treating analogue transmission as a residual or transitional issue.

Table 2 DAB - FM/AM Mix

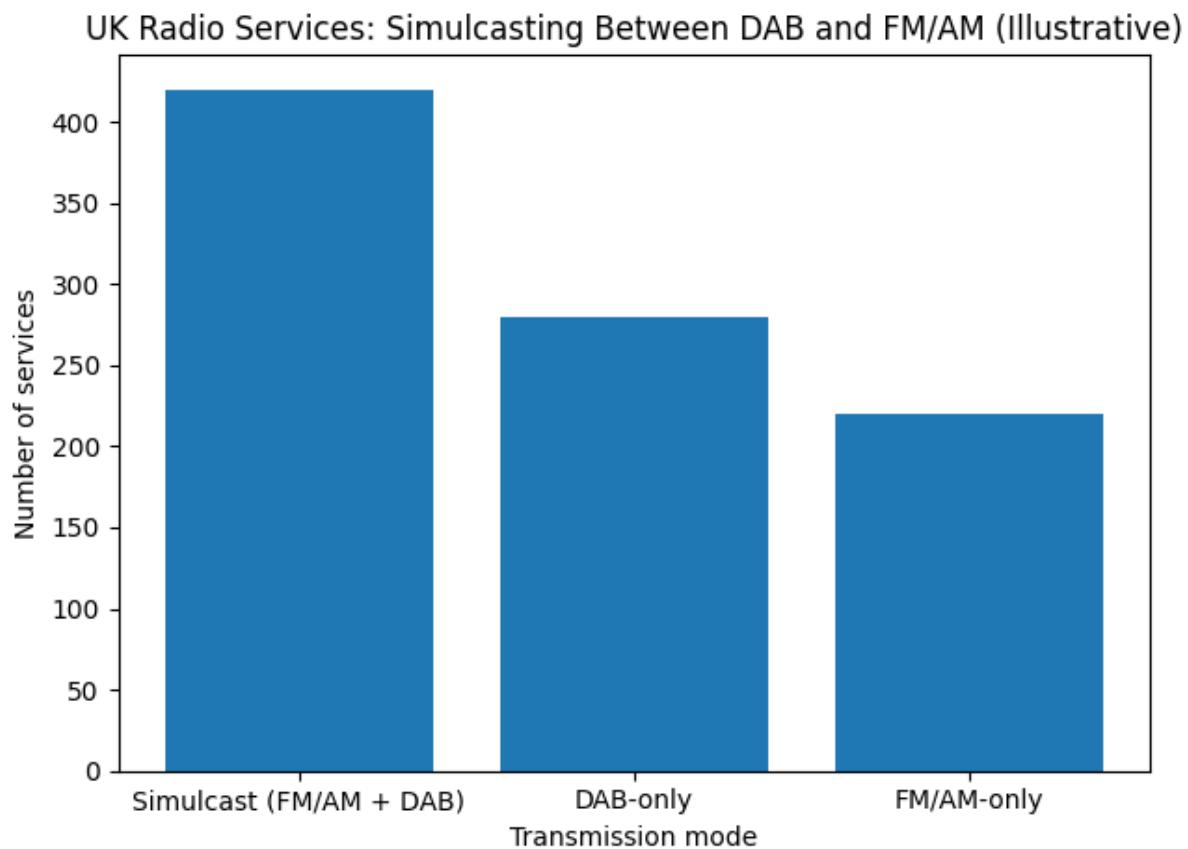
Service category	DAB-only services	FM/AM-only services	Simulcast (DAB + FM/AM)
BBC national services	Some digital-first services	None	Yes – core BBC national networks
BBC local services	Very limited	None	Yes – majority of BBC local radio
Commercial national services	Yes – increasing number	Very limited	Yes – core commercial brands
Commercial local services	Some	Some	Yes – many services
Community radio services	Rare	Yes – many services	Yes – increasing but uneven
Small-scale and specialist services	Yes – common	Some, mainly AM	Limited

The analysis produces three findings of particular relevance to national policy.

- **First:** SSDAB has not primarily functioned as an analogue migration platform. Of the services carried exclusively on SSDAB, fewer than one third are simulcasts of existing FM services. The majority are digital-only services that did not previously exist on analogue. This indicates that the principal growth effect of SSDAB has been new service creation rather than systematic migration of analogue incumbents.
- **Second:** the licensing mix of digital-only SSDAB services is heavily skewed towards commercial DSP licences. Community digital services represent a small minority of digital-only SSDAB services. While Ofcom's own reporting confirms the presence of community digital services on SSDAB multiplexes, they typically account for one or two services per multiplex, compared with a larger number of commercial DSP services.
- **Third:** and most importantly, a large analogue-only cohort persists. Approximately one third of licensed FM and AM services have no presence on any DAB platform, whether national, local, or small-scale. This cohort is overwhelmingly composed of community radio services. The number of analogue-only commercial stations is comparatively small.

This pattern is not incidental. It reflects the interaction of cost sensitivity, governance constraints, coverage mismatch, and the economics of multiplex operation. Community stations, by design, operate with limited revenue, volunteer governance, and place-specific remits. These characteristics make them less able to absorb carriage costs or adapt to coverage footprints that do not closely align with their licensed service areas.

Table 3 Simulcasting Provision



## 5. Multi-Area Expansion and Market Dynamics

The dataset also identifies a pattern of multi-area carriage, with some services appearing on multiple SSDAB multiplexes and, in some cases, also on county-scale local multiplexes. This reflects a rational commercial strategy: once programming is produced, marginal distribution costs across additional multiplexes can be relatively low.

Such behaviour was anticipated in the policy process. During the original consultation, competition authorities raised concerns that multi-licence ownership and consolidation could lead to quasi-regional services and reduce incentives for genuinely local content.

The issue for policymakers is not whether multi-area services should exist, but how their presence affects capacity, pricing, and access for smaller place-based services. Where multiplex viability depends on securing anchor tenants capable of paying carriage fees across multiple areas, community stations may find themselves structurally disadvantaged, even where policy intent favours their inclusion.

## **6. Sentiment Across the Lifecycle of the Small-Scale DAB Programme**

An analysis of longitudinal stakeholder discourse reveals a clear and structured shift in sentiment across the lifecycle of the Small-Scale DAB programme, moving from early optimism to qualified acceptance accompanied by persistent concern. This trajectory provides important contextual evidence for understanding how the policy has been experienced in practice, beyond formal regulatory milestones and headline delivery statistics.

At the outset, sentiment was strongly optimistic. Early discussion framed Small-Scale DAB as a corrective intervention that could revitalise local and community radio, counter perceived homogenisation in commercial broadcasting, and provide an affordable digital pathway for civic and place-based services. Expectations were explicitly value-driven, centred on plurality, local voice, and the belief that a lighter-touch regulatory model would enable grassroots innovation. Concerns were present even at this stage, particularly around spectrum scarcity and the risk of dominance by large operators, but these were largely outweighed by anticipation and confidence in the policy intent.

This optimism gave way to a prolonged period of anticipation and silence during legislative development and consultation. The absence of sustained discourse during this phase suggests a community waiting for delivery rather than disengagement, with attention focused on regulatory progress rather than outcomes. When activity resumed with the first licensing rounds, sentiment shifted to cautious optimism. Stakeholders closely tracked awards and launches, but frustration began to surface around the pace of implementation, administrative complexity, and early signs that delivery timelines might be challenging.

As the programme scaled, sentiment became increasingly mixed. Initial enthusiasm for launches was tempered by practical issues relating to coverage, reception quality, and operational complexity. Technical debates, particularly around transmission design and audio quality, became more prominent. The first licence revocations marked a significant inflection point, introducing doubt about commercial viability and raising questions about whether the model was sustainable beyond early adopters and stronger markets.

By the middle phase of implementation, a broad “reality check” had set in. Discourse increasingly focused on shortcomings rather than possibilities, with recurring concern about inadequate indoor reception, uneven coverage, low audio bitrates, and the proliferation of low-content or automated services. Confidence in the programme’s ability to deliver its original civic promise diminished, and criticism of regulatory processes became more explicit. The language

of innovation and opportunity was gradually replaced by more transactional, technical, and sceptical discussion.

In the later stages of the programme, sentiment stabilised into a form of resigned acceptance. Stakeholders continued to engage actively, but with significantly lowered expectations. Discussion shifted away from what Small-Scale DAB was intended to achieve and towards managing its limitations. The programme came to be understood as a constrained and uneven platform rather than a transformative intervention. Engagement persisted, but primarily as information exchange, fault reporting, and comparative assessment of individual multiplexes and services.

Taken together, this sentiment trajectory indicates that Small-Scale DAB has undergone a process of normative recalibration. The initial vision of a community-led digital renaissance has narrowed into acceptance of a more limited, technically constrained, and commercially fragile tier of broadcasting. This shift does not imply rejection of the programme, but it does signal a substantial gap between original expectations and lived experience. As such, sentiment analysis reinforces the report's broader conclusion that Small-Scale DAB should be understood as a partial and differentiated solution, and that policy must adapt accordingly to avoid erosion of trust, participation, and civic value in the local radio ecosystem.

## **7. Delivery, Viability, and Sustainability**

Ofcom's progress reporting shows that SSDAB rollout has been broadly successful, but it also reveals signs of fragility. A significant proportion of multiplexes launched late in the statutory window, and a non-trivial number of awardees failed to launch within the required timeframe. In at least some cases, this was attributed to reassessments of commercial viability.

This is an important contextual factor. SSDAB multiplexes are small businesses operating in local advertising markets that vary widely in strength. Where viability is marginal, multiplex operators will naturally prioritise services that offer reliable revenue. This commercial reality interacts with the structural characteristics of community radio in ways that limit migration.

## **8. Why a 'Left Behind' Cohort is Structurally Likely**

The persistence of a large analogue-only community radio cohort should not be interpreted as a temporary lag that will resolve itself through further SSDAB rollout.

Several structural factors make continued exclusion likely for a significant proportion of services.

- **Coverage proportionality** means SSDAB footprints do not always align with the micro-geographies served by community stations. Achieving acceptable indoor reception may require multiple transmission sites, increasing costs beyond what local markets can sustain.
- **Multiplex capacity** is finite. Where demand exceeds capacity, prioritisation will tend to favour services with greater ability to pay rather than those with greater civic value.
- Community stations operate under **governance and funding constraints** that limit their ability to commit to long-term carriage contracts, particularly where audience benefit is uncertain.
- **Digital-only distribution** via online platforms does not provide an equivalent substitute for terrestrial broadcasting in terms of universality, resilience, or independence from global platform intermediaries.

Taken together, these factors make it implausible that SSDAB alone will deliver digital terrestrial access for the entire community radio sector.

## 9. Implications for Analogue FM and AM Policy

The central policy implication is that analogue FM and AM provision must remain an active and legitimate part of the UK radio ecology for the foreseeable future. This does not imply indefinite analogue expansion or resistance to digital innovation. It implies recognition that different parts of the sector require different transmission solutions, and that uniform digital transition assumptions are not compatible with plurality or civic resilience.

FM and AM remain comparatively low-cost, flexible, and well-suited to small-area coverage. For many community stations, analogue transmission continues to offer the most proportionate balance between reach, cost, and public benefit. Allowing analogue provision to erode without a viable digital replacement, risks creating a two-tier system: a digitally distributed landscape dominated by commercially scalable services, and a shrinking analogue remnant of civic media with declining prominence and security.

## 10. Policy Recommendations

National policy should therefore adopt a dual-track approach:

**First:** SSDAB should continue to be supported and refined, with a clearer focus on transparency, access conditions, and post-implementation review. This includes monitoring the balance between commercial and community services, the effects of multi-area expansion, and the relationship between carriage pricing and community participation.

**Second:** analogue FM and AM licensing should be explicitly maintained as a viable option for community and small independent services where digital terrestrial provision is impracticable or disproportionate. This requires regulatory clarity, technical competence in spectrum planning, and a willingness to re-license and adapt analogue services within available spectrum constraints.

**Third:** policy discourse should shift away from treating non-migration as a failure, and towards recognising differentiated transmission pathways as a rational response to structural diversity within the sector.

## **11. Strategic Message for Ministers and Legislators**

The question facing policy makers is not whether SSDAB has value. It clearly does. The question is whether national media policy acknowledges its limits. The evidence indicates that a substantial, measurable cohort of community radio services will not be served by SSDAB or other low-cost digital services. Ignoring this reality risks undermining the very civic and local plurality that community radio was created to support. A resilient policy settlement accepts that analogue and digital can coexist, each serving different needs, and that sustaining civic media requires proportionate regulation rather than uniform technological transition. Maintaining this balance is not a concession to the past. It is an investment in democratic infrastructure at local level.

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