

Cornwall independent local radio licence applications

Questions and responses: Atlantic FM

These are the responses received from Atlantic FM to the non-confidential questions asked by Ofcom regarding the group's application for the Cornwall licence.

1. How have you "structured [your] plans to ensure that listeners and advertisers in each of Cornwall's six districts receive effective editorial and sales coverage" (p.17)?

People identify very strongly with their own part of Cornwall first, Cornwall as a whole second. Our key strategies for ensuring balanced coverage across all six districts are:

a) Tindle Radio Support

Tindle's status as the only industry backer with local knowledge and infrastructure provides significant practical help (detailed below) to underpin service to the six districts. More fundamentally, Tindle's proven commitment to genuine local service and independently-run local stations elsewhere gives our plans consistency which underpins sustainability. Of all the potential backers, Tindle is the only one to combine practical usefulness locally with a proven philosophy of independent local programming - demonstrated not just in words but in action. This provides a firm foundation for sustained investment in service to the six districts not only in the usual good intentions of an application but supported through the licence period by a backer whose philosophies and track record match our commitments. Tindle's approach was recently summed up by the judges who presented the Radio Academy Regions and Nations Gold Award for the South West to Island FM:

"This station gives you a clear vision of what is happening in the patch, a station that seems to be in perfect harmony with it's listeners. A good selection of music, a wealth of local content and a newsroom that makes you feel like if anything happens in the TSA you'll know about it. This station is in touch with their community, getting behind the things that matter to their listeners and despite a small team, they cover the agenda impeccably."

This serves as a clear summary of why we chose Tindle, and why they chose Atlantic FM.

b) Station Location

The precise location of the new station dramatically affects its ability to serve the whole of Cornwall. Our proposed location is close to the village of Indian Queens at the intersection of the A30 and the A39 (east/west and northeast/southwest arterial routes). This area is the only location in Cornwall which puts five key towns within a journey time of 20 minutes, and all 12 key towns within an hour.

Number of Key Towns Accessible from Potential Studio Locations						
	Indian Queens	Truro	Falmouth/ Penryn	Redruth/ Camborne	St Austell	Newquay
within 20 mins drive	5	2	1	2	1	1
within 40 mins drive	8	7	3	6	6	6
within 60 mins drive	12	9	8	9	10	10

Accessibility enhances opportunities for editorial staff to achieve regular “on the spot” presence and first-hand understanding. In sales, travelling time is minimised and face-to-face selling time increased. In recruitment, accessibility helps us towards our goal of a well-dispersed staff living as part of the community in a range of districts, not just one or two.

This location is not only as central as it is possible to be, but also avoids aligning the station specifically with one town with the inevitable undercurrent of alienating other towns and districts. Locating in any of the main towns carries a strong association with that town’s distinctive character as well as embroiling the station in rush-hour traffic and parking problems. Our location is semi-rural and fairly traffic-free except on peak summer changeover days when traffic is inescapable. Furthermore the creative environment is in tune with our mainly non-urban target audience across the districts - a subtle but important element of affinity as well as distinctiveness relative to the two existing local stations, both urban-based in a predominantly rural area.

As well as maximising efficiency of outward journeys from the radio station, accessibility extends the boundaries of practicable inward commuting by staff which in turn improves understanding of the TSA. For an individual in programming or sales it is quite feasible to get to grips with a couple of districts in-depth, but impossible to extend the same instinctive understanding and quality of local contacts across all six. The station’s total understanding of Cornwall across the districts therefore relies on the task being broken down into manageable, specific roles and responsibilities - many with a geographical focus.

c) Operational Decentralisation

Region	WEST		CENTRAL		EAST	
District	Penwith	Kerrier	Carrick	Restormel	North Cornwall	Caradon
Population	60,500	92,400	86,800	93,800	81,600	82,100
includes:	Penzance Hayle St Ives	Camborne Redruth Helston	Truro Falmouth Penryn	St Austell Newquay St Columb	Bodmin Launceston Bude	Liskeard Saltash Torpoint

To avoid undue focus on the central territory to the exclusion of east and west, the key editorial provision is two field-based News Reporters, covering the west and east regions from home office/studio facilities. This supplements the station-based journalists focused mainly on the central region, and ensures that most locations in Cornwall are within a twenty minute drive of an Atlantic FM news presence. Tindle stations have been pioneering users of RCS Burli software which enables a “virtual newsroom” to be created remotely almost anywhere to facilitate direct filing of copy and audio into the station’s central servers. Their painstaking experience in perfecting the technology and working practices needed to cover rural areas thoroughly further underpins our quality of service to all six districts. Mirroring the news structure, two home-office-based Sales Executives for East and West will complement the more central focus of the station-based sales team.

Basing these four key staff outside the radio station will help us to meet strict district-based geographical quotas for programming and sales coverage and activity, and make a major contribution towards our goal of achieving a sales and programming presence within a twenty-five minute journey of all key towns.

We have also planned regular programming from outside the main studios, both through traditional OBs and through the emerging feasibility of presenters working “almost-live” and ultimately “live” whether from home, contribution premises (see below), or from other locations via high-speed broadband. While this latter method is likely to be confined by technological limitations to programme inserts and a few off-peak shows in the short-term, it is potentially an exciting way to improve service to each district with “closer to home” programming.

d) Practical Support From Group Members - Bi-Media Reporters, News & Sport Sources

Supplementing the station-based news team and East/West reporters, we will retrain two Newquay Voice reporters and three Tindle reporters as “broadcast-capable” backup. This provides flexibility for newspaper-based reporters in Newquay, Liskeard, Launceston and Bude to file additional stories and audio which we might otherwise be unable to cover. On key long-term issues, access to the depth of accumulated knowledge within the papers further supports our ability to provide full

coverage. It is also helpful that the areas where we have the greatest backup already in place - Caradon and North Cornwall - are precisely the areas which are hardest for our western-based competitors to cover fully and are perceived by many local listeners to be neglected.

For sports reporting across the districts cooperation with Tindle's sports-led Cornwall Independent provides a unique opportunity as the title is the only service with real depth of coverage, even far exceeding BBC Radio Cornwall's fairly impressive sports operation. The Independent has over 130 sources in Cornwall feeding results and reports in a typical week through twelve co-ordinators. In football alone there is full coverage of the Western League, South Western League, East Cornwall League, Cornwall Combination League, Duchy League, Mining Division League and Falmouth/Helston League (as well as Plymouth Argyle which is well-supported in Cornwall). In Rugby all matches are covered in National Divisions 1 and 2, South West Divisions 1 and 2, Western Counties West, Cornwall and Devon League, and Cornwall Divisions 1 and 2. The Independent is the authoritative paper of record for virtually every local sport. Working together is the only cost-effective way to produce a radically improved broadcast sports service rather than a reproduction of existing provision.

e) Practical Support From Group Members - Contribution Points

The Newquay Voice (owned by founder Andrew Laming) has premises in Newquay and Tindle Group newspapers have premises in Liskeard, Saltash, Launceston, Bude and Wadebridge. All offices are manned with reception facilities and provide a sound base for contribution points where interviewees can be properly welcomed and put to air. We have confirmed further contribution points in Penzance and Truro, leaving only St Austell and Falmouth to finalise in the run-up to launch.

Contribution points are invaluable in this geographically extended editorial patch, provided that the on-site welcome and back-up are in place as we have ensured they are. As a priority, we have confirmed (or planned) contribution points close to the constituency offices of all Cornish MPs (currently five, six following post-election boundary revisions which will more closely reflect district boundaries and reinforce their strength of identity as the essential "units" of localness). For cost-effectiveness, it is agreed that all capital and running costs of contribution points are met by our partners in exchange for on-air credits.

f) "Eyes & Ears"

Contacts are the lifeblood of local news and programming, and in Cornwall still more so given the dispersed population and decentralised way of life. To address this we have planned a pyramidal structure of "Eyes and Ears" contacts designed to maximise information flow within controlled reporting lines. The method combines comprehensiveness with manageability, ensuring that significant events and issues will be picked up while at the same time avoiding the chaos of almost unlimited material. In summary, the contacts pyramid for each of the three "regions" is led by a board director, and within each region a member of the programming staff is the lead contact for each district. There are two further levels in the structure with 3 co-ordinators per district each dealing with a further three more locally focused contacts. At local level this provides 9 key contacts per district, 54 in total. While this may seem quite ambitious, it should be seen in the context of Tindle's existing **155** local and micro-local correspondents already in place covering North Cornwall and Caradon alone. This, together with the strength of the Newquay Voice's contacts in northern Restormel and Tindle's coverage of southern Restormel, provides the recruiting ground for "Eyes & Ears" already in place in three of the six districts.

g) Speech Commitment

It is impossible to achieve good geographical balance without allocating a fair proportion of output to speech - allowing adequate bulletin and feature durations to allow district content quotas to be met. We are one of only two applicants making a clear Format commitment to at least 30% daytime speech. This benchmark is a key element of our plans to ensure balanced service to each district. To clarify, we approach the programming challenge from a different angle compared with some other applicants. Rather than being a slightly older or younger but still mainly music-intensive version of Pirate FM, we see Atlantic FM more fundamentally as a brighter, sharper and more concise version of BBC Radio Cornwall - complementing Pirate's appeal not primarily in age terms (as it has no clear age profile) but as a more informative, information-rich and specifically Cornish ILR station. Our commitment to speech and a district-led philosophy are at the heart of this approach.

h) Marketing and PR

We have structured Marketing and PR to maximise effectiveness across the districts. This in turn benefits both programming and sales. The strategy is commercially sensitive; a summary has been provided confidentially.

- 2. The table on p.37 of the application states that Atlantic FM aims to have a "classless" appeal to "thinking adults". Please amplify what is meant by this statement, and provide details of any**

evidence that there is a demand among such persons for the type of service proposed in your application.

By “classless appeal” we mean that in terms of audience delivery by social grade we intend that the service should not show marked ABC1 or C2DE bias, but achieve balance across both broad sections of the market. Quite apart from complementing Pirate FM’s strong C2DE bias, this reflects our core “One & All” philosophy of balanced appeal (also balanced between older and younger listeners, east and west) to maximise responsiveness to a range of tastes and interests, broadening appeal to underpin sustainability. The term “thinking adults” was a direct quote from a focus group participant. The full quote was included in an earlier draft of the bid but later removed in the editing process:

For a new station I think that they have perhaps an opportunity for a different approach which is a bit more interesting or challenging ... we’re not idiots in Cornwall but if you listen to stations like we’ve got down here you might think we are ... this [new] station could be a bit more ... I suppose .. for “thinking adults” if you like.

A similar theme came up many times in the consultation process and is crystallised in a support letter:

Pirate FM is the Sun/Mirror side of radio and I dislike that; Radio Cornwall is the Times or Telegraph. Atlantic FM is offering something for the Daily Mail/Express reading listener who is poorly served at the moment. The station will encourage people to look at their communities and talk about how they can make it better, by discussing issues that effect them. During the six years of [our RSL project] Malibu the John London program has tackled all kinds of issues and I want to see that continue.

While we don’t see ourselves as closely aligned with every aspect of the Mail or the Express, we agree strongly with the underlying point that radio does not need to be polarised between extremes of tabloid banality and dry (or dull) information. In the RSLs and in our plans we have sought an entertainment/information balance which we see as the key gap in the market as well as (instinctively) the station we ourselves and most of our neighbours want to hear. To be clear, we are not saying that Cornwall needs a specifically upmarket service (although the area is slightly ABC1-biased). Our goal is a “classless” station which delivers entertainment and fun while avoiding a heavily tabloid flavour, plus a wealth of information-led content which is interesting and thought-provoking without being unduly long-winded or high-brow.

Notions of upmarket, downmarket, and “thinking adults” are all broad-brush and potentially patronising. The underlying spectrum of tastes we are really alluding to here is more about the extent to which people are actively interested in the world, engaged in the world, and open to

new thoughts, ideas, stories and experiences. This has some correlation with social grade but is not the same thing. Another way of summing it up is the simple principle of not underestimating the intelligence of the listeners. This in turn opens up the station's appeal to listeners of all ages who are less satisfied with Pirate FM's information-light tabloid approach.

Demand for a new service achieving "classless" appeal:

a) existing listening patterns

Pirate FM achieves 26.2% audience share among C2DEs but only 14.8% among ABC1s. Similarly BBC Radio Cornwall registers 25.0% among C2DEs; 16.3% among ABC1s. Both stations are also C2DE-biased in reach. Pirate's C2DE bias exceeds the UK ILR average and in the context of an ABC1-biased Cornish population this implies unfulfilled potential for the new station to address.

Since the primary *raison d'être* of the new service as we conceive it is localness, we believe the key market gap issue is how the station is positioned relative to the existing two local services. Our vision of a content-rich "classless" format which complements Pirate FM's C2DE-biased "pure entertainment" approach and Radio Cornwall's C2DE-biased "informative but parochial" style meets the gap.

b) Atlantic FM main quantitative survey

More evidence of the downmarket bias of both local stations emerged in our own survey. 31% of C2DEs cite Pirate FM as their favourite station, but only 21% of ABC1s. 27% of C2DEs cite BBC Radio Cornwall as favourite, but only 22% of ABC1s. In terms of satisfaction with the two local stations' music, 24% of Pirate FM's C2DE listeners said the station's music mix was completely in tune with their tastes, but only 13% of ABC1s. For Radio Cornwall, the equivalent figures were 20% and only 9% respectively.

Looking at satisfaction with news and information, 23% of Pirate FM's ABC1 listeners rated the station as "excellent", but only 15% of ABC1s said the same. Among Radio Cornwall's listeners there was only a slight C2DE bias in this context (26% vs 25% among ABC1s). Assessing overall standards of professionalism, 34% of Pirate FM's C2DE listeners rated the station as "very professional" compared with only 22% of the station's ABC1 following. Interestingly Radio Cornwall listeners rated their station more highly with 40% of C2DEs and 34% of ABC1s rated the station as "very professional".

The pattern of both local stations appealing much more strongly to C2DEs in the context of an ABC1-biased area underlines the potential for a new station determined to redefine localness with distinctive intelligent content, musical imagination, and non-parochial style. In speech content we believe the key ingredients of “classlessness” in an ILR context are to be thorough but concise, intelligent but accessible. In terms of music, the main factors to redress the C2DE bias of the existing stations are more to do with quality and a different balance between endless repetition of old favourites and less familiar but still appealing songs. We believe our music mix of quality adult hits and specifically “cool classics” delivers in this context.

Looking at the key questions seeking to quantify demand for Atlantic FM in the main survey, four findings particularly support our conviction that the station can address the market gap identified above. For preferred formats (from options broadly covering all the applicants), our non-age-led “broad mix” was ranked a very strong first among both ABC1s (preferred by 45%) and by C2DEs (48%). 59% of ABC1s also felt that our approach is the best way to extend choice relative to Pirate FM as did 63% of C2DEs. In terms of music mix, we ranked a strong first again with 55% of ABC1s preferring our approach and 60% of C2DEs. Finally a high 72% of ABC1s and 79% of C2DEs felt that local news and information - a strong priority for us - is either essential or very important on the air. So while these figures all show a slight C2DE bias it is much less marked than in the existing listening profile and satisfaction ratings for the existing local services.

c) Consultation & Focus Groups

Consultation and focus groups were very helpful for assessing strengths and weaknesses of existing local provision, which in turn clarify our opportunity in the market. The key weaknesses identified in existing stations all point to different aspects of C2DE-biased content and appeal - in broad terms Pirate FM’s perceived lack of imaginative or challenging content both in music and speech, and Radio Cornwall’s perceived inability to present its comprehensive information content in a incisive contemporary style with appeal for a younger, less downmarket following. Typical relevant quotes:

Combine the best of Pirate with the best of Radio Cornwall then you’d have a Cornish version of Pirate FM or an entertaining Radio Cornwall - or both!
**Caradon Councillor,
Consultation Survey**

Pirate FM or Radio 2 for music, Radio Cornwall for news - it's only them talking about where we live so yes, a bit of competition - why not?

Female Focus Group

Participant, Wadebridge

Whatever you do, let's just hope it's a bit funkier and a bit less dull than what we've got already down here.

Cornish MP, one-to-one briefing

3. What was the rationale for employing two different fieldwork approaches – on-line and in-street interviews – in the music survey? To what extent might the merging of the two data sets have affected the validity of the findings from this piece of research?

We launched the music survey expecting to achieve a full sample online by email invitation - this confidence was based partly on high response to the earlier online Summer Consultation. However, by the end of the second week response was still relatively poor among 45+ and more particularly 55+ age groups.

To address this in the third week we compiled a new email invitation list with an older bias and organised three days of street interviews as a backup in case we failed to achieve our target of 50 responses in each ten year age band from 15-64. As it turned out, the second email invitation list was quite successful and also inadvertently brought in a high number of 65+ respondents, as did the street interviews which although targeted at 45-64s relied on interviewers' initial estimate of age which was only specified at the end of the questionnaire.

After reviewing the responses, we inputted the 45-64 street interviews into the online system only insofar as they were needed to bring both 45-54s and 55-64s up to the target of 50. This involved only 4 respondents aged 45-54, and 17 aged 55-64. By that stage we also had considerable 65+ data split between online and street. We decided to add these in as we felt the results were of interest if treated with caution. Admittedly there is an issue of whether data gathered in different ways is representative, but equally different types of people respond to different methods and in the case of online research the contrary danger is that older respondents may not be represented properly at all since they are much less active internet users.

As detailed on page 1 of the tables, no street interviews from 15-44s were used at all, and among the key groups we identified for analysis the percentage of street interviews was only 4% among 35-54s and 2% among 25-54s. The influence of the street interviews was therefore very limited in the groups we prioritised in our consideration of the

results, namely the broad target market of 25-54s and the individual ten-year and twenty-year age bands within this group.

We acknowledge that the fieldwork as a whole was slightly unorthodox, but because our analysis and conclusions were focused on those parts of the sample which were broadly consistent in method we do not think the validity of the main findings was significantly affected. We would also emphasise that this was an important but secondary piece of research complementing the music findings of our main survey which we believe to have been one of the most rigorous studies in the licence round with its comprehensive sample of 861, extremely careful geographical stratification, and an in-home methodology to maximise reliability compared with street or telephone interviewing.

Finally, we would like to correct the reference on page 41 of the application to a music survey sample of 371. This figure includes 30 online responses from under-15s which were deleted from the final sample of 341.