
Absolute Radio – proposals to reduce AM coverage

Proposed variation of national analogue radio licence

CONSULTATION:

Publication Date: 9 February 2018

Closing Date for Responses: 2 March 2018

About this document

This document is about Absolute Radio's proposals to reduce by 5% the transmission coverage of its AM national commercial radio licence. We are giving stakeholders an opportunity to make comments on our provisional decision to accept these proposals. This is because, if the changes are permitted, some listeners will lose their ability to receive Absolute Radio on the AM band, and because other commercial radio stations might be interested in the approach that we are minded to take in this case. We will carefully consider any comments from stakeholders before making a final decision.

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1. Executive summary

Introduction

- 1.1 Absolute Radio holds a national commercial radio licence to broadcast its rock-oriented service across the UK on the AM (medium wave) band. Under its broadcasting licence, Absolute Radio must secure that its service serves so much of the UK “as is for the time being reasonably practicable”.
- 1.2 Through a combination of closing some transmitter sites and reducing the transmitting power at others, Absolute Radio has proposed a reduction in the coverage of its AM network from 90.5% of the UK adult population to 85.4%, which would take effect from May 2018.
- 1.3 Absolute Radio has made these proposals in the context of declining listening to AM radio and increasing transmission costs and noted that, if it is not able to make these changes, it may have to consider shutting down Absolute Radio’s entire AM network and surrendering its national licence.

Ofcom’s provisional assessment

- 1.4 Having considered Absolute Radio’s proposals, including financial information provided by the licensee, our provisional view is that the cost to Absolute Radio of continuing to provide the existing level of coverage on AM would be disproportionate to the number of listeners likely to be affected by the proposed changes.
- 1.5 Therefore, we are minded to accept Absolute Radio’s proposals and we consider that our provisional decision would comply with our statutory duties. In summary, this is because:
 - a) in these specific circumstances, we consider that broadcasting the licensed service to 85.4% of the UK adult population would still ensure optimal use of spectrum; and
 - b) the availability of Absolute Radio on alternative platforms is likely to maintain a plurality of radio providers and radio services in the geographical areas affected by the proposals.
- 1.6 If we decide to accept Absolute Radio’s proposals, we would vary its broadcasting licence and its associated Wireless Telegraphy Act licence by removing reference to the transmitter sites that Absolute Radio is proposing to close.

Next steps

- 1.7 We are currently aiming to make a final decision and publish a statement in March 2018. We will carefully consider any comments that stakeholders might wish to make before making any final decision. We are giving stakeholders until **Friday 2 March 2018** to provide comments.

2. Background

- 2.1 Absolute Radio Limited (**'Absolute Radio'**, or the **'Licensee'**) holds one of the three national analogue commercial radio licences¹ in the UK issued under the Broadcasting Act 1990 (the **"Broadcasting Licence"**). Under the terms of its Broadcasting Licence, it must provide a radio service which is "a rock-orientated station combining new music with classic album tracks, aimed at 25-44 year-olds".
- 2.2 The Broadcasting Licence was initially awarded by an auction process in May 1992, and has subsequently been renewed on three occasions. The latest renewal process was completed in February 2017, when we decided to renew the Broadcasting Licence for a further five-year period, until April 2022.²
- 2.3 Since its launch in 1993, Absolute Radio (formerly known as Virgin Radio) has incrementally increased the coverage of its national analogue AM radio service to, currently, 90.5% of the UK adult population through voluntarily adding further transmitter sites. These transmitter sites were commissioned over the years by the Licensee to increase the 84% adult population coverage achieved at the launch of Virgin Radio by the 'mandatory' transmitters, which were a requirement of the original licence award.
- 2.4 On 17 January 2018, Ofcom received a formal submission from Absolute Radio proposing to introduce two changes to its AM network that, taken together, would reduce coverage to c.85.4%. These changes are:
- a) **reducing the transmitting power at five transmitter sites³ by 3dB** as soon as possible following Ofcom's approval, which would reduce total coverage from 90.5% to 88.7%; and
 - b) **closing 12 transmitter sites** from May 2018, which would further bring total coverage down to 85.4%. These transmitters are located at Plymouth, Redmoss (Aberdeen), Hull, Torbay, Redruth, Hoo (Kent), Greenside Scalp (Dundee), Wallasey, Pirbright (Guildford), Chesterton Fen (Cambridge), Rodbourne Sewage (Swindon) and Sheffield.
- 2.5 In addition to this national AM licence, Absolute Radio also broadcasts the same editorial content on analogue FM licences for Greater London and the West Midlands, and nationally on the Digital One DAB multiplex. The service is also available via television on the Freeview, Sky and Virgin Media platforms, in addition to the internet.
- 2.6 A copy of the Broadcasting Licence is published as a separate document (**Annex A5**).
- 2.7 A non-confidential version of Absolute Radio's submission, setting out its proposals and the reasons for them, is published as a separate document (**Annex A6**).⁴

¹ The other two licences are held by Talk Sport and Classic FM.

² <https://www.ofcom.org.uk/consultations-and-statements/category-3/renewal-independent-national-radio-licences>

³ Brookmans Park, Droitwich, Moorside Edge, Westerglen and Washford.

⁴ Absolute Radio has also provided Ofcom with a confidential version of its submission, which contains financial information in support of its request.

3. Legal framework

Structure of this section

- 3.1 In this section, we set out the legal framework for assessing Absolute Radio’s proposals as follows:
- a) we set out our statutory duties that are of particular importance to assessing whether we should allow Absolute Radio to implement the proposed changes;
 - b) we summarise the relevant licence conditions;
 - c) we explain how we are minded to apply our statutory duties to assessing Absolute Radio’s proposals; and
 - d) finally, we explain how we would implement the changes proposed by Absolute Radio and our approach to impact assessment.
- 3.2 For brevity, we refer to: the Communications Act as the “**2003 Act**”; the Broadcasting Act 1990 as the “**1990 Act**”; and the Wireless Telegraphy Act 2006 as the “**WT Act**”.

Ofcom’s statutory duties

- 3.3 The statutory duties that appear of particular importance to assessing Absolute Radio’s proposals derive from the 2003 Act and the 1990 Act.

Our duties under the Communications Act 2003

- 3.4 Ofcom's principal statutory duty as set out in section 3 of the 2003 Act is to further the interests of citizens in relation to communications matters; and to further the interests of consumers in relevant markets, where appropriate by promoting competition. Ofcom is also required to secure (amongst other things):
- a) the optimal use for wireless telegraphy of the electro-magnetic spectrum;⁵
 - b) the availability throughout the UK of a wide range of television and radio services which (taken as a whole) are both of high quality and calculated to appeal to a variety of tastes and interests;⁶ and
 - c) the maintenance of a sufficient plurality of providers of different television and radio services.⁷
- 3.5 In performing our duties, we must have regard to a number of factors that appear to us to be relevant in the circumstances. In this case, we consider that “the different interests of persons in the different parts of the United Kingdom, of the different ethnic communities

⁵ Section 3(2)(a) of the 2003 Act.

⁶ Section 3(2)(c) of the 2003 Act.

⁷ Section 3(2)(d) of the 2003 Act.

within the United Kingdom and of persons living in rural and in urban areas” is of particular importance (section 3(4)(l) of the 2003 Act).

- 3.6 In performing our duties, we are also required under section 3(3) of the 2003 Act to have regard in all cases to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed.

Our duties under the Broadcasting Act 1990

- 3.7 In addition, under section 85 of the 1990 Act, Ofcom is required to secure the provision of a diversity of national analogue services, of which one must consist mainly of speech and another must consist wholly or mainly of non-pop music.

Absolute Radio’s broadcasting licence

The ‘reasonably practicable’ threshold for ensuring coverage

- 3.8 Condition 2(1) of the Broadcasting Licence requires Absolute Radio to secure that its analogue radio service serves so much of the UK “as is for the time being reasonably practicable”.⁸ This licence condition mirrors section 106(2) of the 1990 Act, which provides that:

“A national or local licence shall include conditions requiring the licence holder to secure that the licensed service serves so much of the area or locality for which it is licensed to be provided as is for the time being reasonably practicable”.

- 3.9 The Broadcasting Licence requires Absolute Radio to reach such coverage by broadcasting the licensed service from 33 “transmitter sites”. The location and technical characteristics of these transmitters are specified in the Broadcasting Licence (Parts II and III of the Annex).

Failure to comply with the coverage requirement

- 3.10 Failure to secure that the licensed radio service serves so much of the UK “as is for the time being reasonably practicable” may constitute a breach of Condition 2(1) of the Broadcasting Licence.⁹
- 3.11 The range of penalties that can be imposed on licensees for breach of a licence condition includes financial penalties, shortening the licence, suspending the licence or revocation. These penalties are set out in the statutory regime, together with procedural

⁸ This licence condition reads as follows: “The Licensee shall provide the Licensed Service specified in the Annex for the licence period and shall secure that the Licensed Service serves so much of the licensed area as is for the time being reasonably practicable.”

⁹ We would investigate any such breach according to our Enforcement Guidelines. See Ofcom’s “General procedures for investigating breaches of broadcast licences”, 3 April 2017; https://www.ofcom.org.uk/_data/assets/pdf_file/0019/31942/general-procedures.pdf.

requirements,¹⁰ and mirrored in the Conditions set out in Part IV (‘Conditions relating to enforcement of licences’) of the Broadcasting Licence.

Licence variations

- 3.12 Ofcom has a general power to make changes to broadcasting licences by means of serving a notice of variation on the licensee.¹¹ This power is reflected in Condition 23 of the Broadcasting Licence. We must give the licensee a reasonable opportunity to make representations before making the variation (Condition 23.2 of the Broadcasting Licence).¹²

Absolute Radio’s wireless telegraphy licence

- 3.13 Absolute Radio holds also a licence issued under the Wireless Telegraphy Act 2006 (the “**WT Licence**”) which authorises it to establish, install and use radio transmitting stations and/or radio apparatus (i.e. transmitters) in the same locations authorised under its Broadcasting Licence (i.e. 33 sites in total) for the transmission of the sound broadcasting service described in the Broadcasting Licence.
- 3.14 Condition 3 of the WT Licence allows Ofcom to vary this licence in specific circumstances, which include where the variation is “at the request of, or with the consent of, the Licensee”¹³, and requires us to notify the licensee in writing or by a general notice in accordance with Schedule 1 paragraph 6 of the WT Act. Ofcom has a broad discretion under paragraph 6 of Schedule 1 of the WT Act to agree to vary licences, but legal rules operate to limit that discretion. In particular, according to paragraph 6A of Schedule 1 of the WT Act, any variation of a wireless telegraphy licence must be objectively justifiable.

Application of our relevant duties to assessing Absolute Radio’s proposals

Ofcom’s task

- 3.15 Given the requirement set out in Condition 2(1) of the Broadcasting Licence (see paragraph 3.7 above), the main questions that we need to address are:
- c) whether it remains reasonably practicable for Absolute Radio to serve **90.5%** of the UK population with its analogue radio service; and

¹⁰ Sections 109-111 of the 1990 Act.

¹¹ Section 86(5) of the 1990 Act. The 1990 Act provides that if Ofcom thinks that it would be reasonably practicable for a national service to be provided to an additional area falling outside the minimum area set in the award process, Ofcom can require the licensee to provide the service for that additional area (section 106(3)). However, the 1990 Act does not contain any specify provision for requests to reduce the minimum area.

¹² This licence condition mirrors section 86(5)(b) of the 1990 Act. Condition 24 of the Broadcasting Licence specifies in which way we may give any notice of variation, including in electronic form (subject to the requirements set out in Sections 395 and 396 of the 2003 Act).

¹³ This licence condition mirrors Schedule 1, paragraph 8(2)(a) of the WT Act 2006.

d) if that level of coverage is no longer reasonably practicable, whether the combined effect of the measures that Absolute Radio has proposed to take (i.e. a reduced coverage of **85.4%** of the UK population), would meet the “reasonably practicable” threshold set out in the licence conditions.

3.16 The “reasonably practicable” threshold is essentially a balancing exercise to ensure proportionality. To simplify, we put on one side any costs and other disadvantages involved in providing the service at the current level of coverage and, on the other side, the nature and extent of the risks involved if the current coverage of the service was reduced. In considering the various factors involved in this balancing exercise, we need to take account of our statutory duties.

Ofcom’s provisional decision in light of our statutory duties

3.17 For the reasons set out in Section 4 of this document, we are minded to accept Absolute Radio’s proposals and we consider that our provisional decision would comply with our statutory duties (paragraphs 4.15-4.18). In summary, this is because:

- a) in these specific circumstances, we consider that broadcasting the licensed service to 85.4% of the UK adult population would still ensure optimal use of spectrum; and
- b) the availability of Absolute Radio on alternative platforms (including digital radio, television and internet) is likely to maintain a plurality of radio providers and radio services in the geographical areas affected by the proposals.

3.18 We also note that removing reference to the transmitter sites that Absolute Radio has proposed to close from its WT Licence (with effect from the date when Absolute Radio intends to close them) would be objectively justifiable as it would align this licence with the Broadcasting Licence.

Implementation

3.19 If we decide that it is appropriate for Absolute Radio to take the proposed measures, including closing certain transmitter sites, we need to vary its Broadcasting Licence and WT Act Licence by removing reference to the transmitter sites that Absolute Radio has proposed to close, with effect from the date when Absolute Radio intends to close them. To do so, we need to notify Absolute Radio and give it a reasonable opportunity to make representations (see paragraph 3.11 above).

3.20 Although there is no statutory requirement to consult more widely, we are allowing stakeholders an opportunity to provide comments in this specific case, since we note that:

- a) according to Absolute Radio’s estimates based upon transmission projections and RAJAR¹⁴ audience figures, around 19,000 existing listeners would lose access to the AM service as a result of the proposed changes; and

¹⁴ Radio Joint Audience Research Ltd.

b) holders of other analogue commercial radio licences, and particularly those holding AM licences, might be interested in the approach that we are minded take in this case.

3.21 We are giving stakeholders three weeks to provide any comments they might wish to make. In our view, given the very narrow scope of this consultation, this period gives interested parties an appropriate period in which to consider and respond to this consultation.

3.22 We will carefully consider any comments from stakeholders before making any final decision.

Impact assessment and equality impact assessment

3.23 This document, as a whole, comprises an impact assessment as defined in Section 7 of the 2003 Act. We have not identified any detrimental impact on any equality groups (i.e. age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation). Nor have we seen the need to carry out a separate equality impact assessment in relation to the additional equality groups in Northern Ireland: religious belief, political opinion and dependents. This is because we anticipate that the changes proposed by Absolute Radio will not have a differential impact in Northern Ireland compared to consumers in general.

4. Our provisional assessment

Summary of Absolute Radio's request and rationale

4.1 Absolute Radio has proposed to reduce the power by 3dB at the following transmitter sites in its network:

- Brookmans Park (serving London and the northern home counties);
- Droitwich (serving the West Midlands);
- Moorside Edge (serving the North West and Yorkshire);
- Westerglen (serving Central Scotland); and
- Washford (serving South Wales, Avon and Somerset).

4.2 In addition, Absolute Radio has proposed to close the following 12 transmitters:

- Plymouth;
- Redmoss (Aberdeen);
- Hull;
- Torbay;
- Redruth;
- Hoo (the Medway area of Kent);
- Greenside Scalp (Dundee);
- Wallasey;
- Pirbright (Guildford);
- Chesterton Fen (Cambridge);
- Rodbourne Sewage (Swindon); and
- Sheffield.

4.3 Absolute Radio has calculated that, taken together, these changes would lead to the adult (aged 15+) UK population coverage of its licensed service being reduced from 90.5% to 85.4% (see map at Annex A6 to Absolute Radio's submission for the affected areas).

4.4 Absolute Radio argues that, in the context of the long-term decline in listening to AM radio (and, in particular, to music radio on AM), it is no longer practicable in commercial terms for it to continue to serve 90.5% of the UK adult population. Absolute Radio says that the cost savings, including electricity costs, which would accrue from its proposed changes would reduce the total annual transmission costs for its AM network by just over half. This, according to Absolute Radio, would make it financially viable for it to continue to provide an AM service to the remaining 85.4% of the UK adult population.

- 4.5 Without the requested coverage reduction, Absolute Radio states that the business related to its AM licence would “fall into loss immediately, with the scale of losses increasing throughout the term of the licence and seriously damaging the profitability of the Absolute Radio business as a whole.” Under that scenario, Absolute Radio said that it would be likely to close the entire Absolute Radio AM network and surrender the licence.
- 4.6 In terms of terrestrial broadcast radio coverage, Absolute Radio notes that around 2.5 million of the 2.66 million adults who it estimated would lose coverage of the Absolute Radio AM signal would be able to listen to the same national Absolute Radio service by means of DAB transmission.
- 4.7 To put its request in context, Absolute Radio also notes the BBC’s current closure programme of local radio AM transmitters, and the Government’s ongoing support for a transition from analogue listening to the DAB platform. RAJAR data for Q4, 2017 shows that listening via digital platforms now accounts for 49.9% of all radio listening.

Ofcom’s preliminary view on the request

Impact on listeners

- 4.8 On the basis of the information provided to Ofcom by Absolute Radio, the proposed changes would have the following effects:
- a) the proposed changes would result in about **2.66m** of potential adult listeners losing their ability to receive Absolute Radio’s AM signal;
 - b) of these, about **2.5m** of potential adult listeners would instead be able to listen to Absolute Radio on DAB digital radio;
 - c) therefore, around **166,000** of potential adult listeners would lose AM coverage and would also not have the option of listening Absolute Radio on DAB digital radio. However, they are likely to be able to listen to Absolute Radio via the internet and other digital platforms; and
 - d) based upon analysis of audience listening data from RAJAR Q2 2017, Absolute Radio estimates that the number of current Absolute Radio AM listeners who would no longer be able to access Absolute Radio’s AM signal is approximately **19,000** adults. We note that this represents 4% of the total AM audience of Absolute Radio, which was 472,000 adults in RAJAR Q4 2017.

Compliance with the licence condition

- 4.9 As already noted in Section 3 (paragraph 3.7), Condition 2(1) of the Broadcasting Licence requires that the licensed service serves so much of the UK “as is for the time being reasonably practicable.”
- 4.10 In our view, beyond considerations of what is technically and logistically possible in terms of transmission provision (for example, the availability of suitable transmission sites), the “reasonably practicable” threshold is a balancing exercise to ensure proportionality

between the costs and disadvantages to the licensee on one hand, and the benefits to potential listeners on the other. Therefore, we considered that costs to the licensee are a relevant consideration, and we should take them into account.

- 4.11 Based upon Absolute Radio's estimates¹⁵, the number of existing listeners to Absolute Radio's AM network who would be likely to lose AM reception of the station as a result of Absolute Radio's proposals would be relatively small, being around 19,000 adults.
- 4.12 However, according to the information provided by Absolute Radio, if Absolute Radio were to retain its existing levels of coverage on AM, it would have to more than double its annual transmission expenditure. This is because some of the existing transmitters it is planning to close would need replacing. This would have a significant impact upon Absolute Radio's profitability, both in terms of the specific business relating to its AM licence and the wider Absolute Radio business.
- 4.13 Having carefully considered the financial information provided to us by Absolute Radio, our view is that the cost to Absolute Radio of continuing to provide the existing levels of coverage on AM would be disproportionate to the number of listeners likely to be disadvantaged.
- 4.14 We also noted the long-term decline in the popularity of listening to the AM band, and that 2.5 million out of the 2.66 million adults who would lose the ability to access the Absolute Radio AM signal would be able to continue to receive Absolute Radio via national DAB digital radio. In the relatively few areas where reception of the national Digital One multiplex is unavailable, there are further options to listen online, or via television (the station is available on the Freeview, Sky and Virgin Media platforms).
- 4.15 Finally, we were also cognisant that, if the plan were to be implemented, the percentage of UK adults able to receive Absolute Radio on AM would still be greater than that provided by the "mandatory transmitters" at the launch of Virgin Radio in April 1993.

Assessment against Ofcom's statutory duties

- 4.16 As noted in Section 3, in considering whether Absolute Radio would remain compliant with its licence conditions, we also need to take account of Ofcom's wider statutory duties.
- 4.17 Ofcom's principal statutory duty as set out in section 3 of the 2003 Act is to further the interests of citizens in relation to communications matters; and to further the interests of consumers in relevant markets, where appropriate by promoting competition. Ofcom is also required to secure (amongst other things):
- a) the optimal use for wireless telegraphy of the electro-magnetic spectrum;
 - b) the availability throughout the UK of a wide range of television and radio services which (taken as a whole) are both of high quality and calculated to appeal to a variety of tastes and interests; and

¹⁵ Based on Absolute Radio's transmission projections and RAJAR audience figures.

c) the maintenance of a sufficient plurality of providers of different television and radio services.

4.18 In considering the need to secure **optimal use of spectrum**, while we recognise that the implementation of Absolute Radio’s proposals would mean a 5% reduction in coverage of its AM network, Absolute Radio would continue to use the relevant spectrum to broadcast to 85.4% of the UK adult population. As Absolute Radio has noted in its submission, if it is not able to implement these measures, it may prove uneconomic for it to continue to operate its Broadcasting Licence, which might result in the company surrendering it back to Ofcom. If Ofcom were to re-auction the Broadcasting Licence, there would be no guarantee that any bidders would be willing to provide 90% population coverage (that is, the level of coverage currently provided by Absolute Radio). Indeed, given the high costs involved and the declining popularity of AM among listeners, they might offer to provide considerably less coverage. Therefore, we consider that, in these specific circumstances, Absolute Radio’s proposal to continue to broadcast its licensed service to 85.4% of the UK adult population would secure optimal use of spectrum.

4.19 With regard to the need to ensure **plurality of services and providers**, we note that Ofcom licenses a wide variety of television and radio services across the UK, on a range of different platforms, with a variety of different programme formats. As previously noted, the vast majority of Absolute Radio listeners affected by its proposals would be able to re-tune to the service on national DAB radio. Finally, we also note that the availability of Absolute Radio on alternative broadcast platforms (i.e. on Freeview, Sky and Virgin Media platforms) and internet would further contribute to mitigating any potential adverse impact on consumers.

Licence variations

4.20 Therefore, subject to consideration of stakeholders’ responses, we are minded to accept Absolute Radio’s proposals and remove reference to the transmitter sites that Absolute Radio has proposed to close from its Broadcasting Licence and WT Act Licence, with effect from the date when Absolute Radio intends to close them.

Consultation question

Question 1: Do you agree that Ofcom should give its consent to the reductions in AM (medium wave) transmitter coverage proposed by Absolute Radio? If you do not agree, please give reasons.

A1. Responding to this consultation

How to respond

- A1.2 Ofcom would like to receive views and comments on the issues raised in this document, by **5pm on Friday 02 March 2018**.
- A1.3 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-3/absolute-radio-proposals-to-reduce-am-coverage>. You can return this by email or post to the address provided in the response form.
- A1.4 If your response is a large file, or has supporting charts, tables or other data, please email it to absolute.radio@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet (<https://www.ofcom.org.uk/consultations-and-statements/consultation-response-coversheet>). This email address is for this consultation only, and will not be valid after 02 March 2018.
- A1.5 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Jon Heasman
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A1.6 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- Send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files. Or
 - Upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A1.7 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A1.8 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt if your response is submitted via the online web form, but not otherwise.
- A1.9 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A1.10 It would be helpful if your response could include direct answers to the question asked in the consultation document. The question is listed at Annex A4. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

A1.11 If you want to discuss the issues and questions raised in this consultation, please contact Jon Heasman on 020 7783 4509, or by email to jon.heasman@ofcom.org.uk.

Confidentiality

- A1.12 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish all responses on our website, www.ofcom.org.uk, as soon as we receive them.
- A1.13 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A1.14 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A1.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further at <https://www.ofcom.org.uk/about-ofcom/website/terms-of-use>.

Next steps

- A1.16 Following this consultation period, Ofcom plans to publish a statement in March 2018.
- A1.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications; for more details please see <https://www.ofcom.org.uk/about-ofcom/latest/email-updates>

Ofcom's consultation processes

- A1.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex x.
- A1.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact Steve Gettings, Ofcom's consultation champion:

Absolute Radio – proposals to reduce AM coverage

Steve Gettings
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A2. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

- A2.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

- A2.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A2.3 We will make the consultation document as short and simple as possible, with a summary of no more than two pages. We will try to make it as easy as possible for people to give us a written response. If the consultation is complicated, we may provide a short Plain English / Cymraeg Clir guide, to help smaller organisations or individuals who would not otherwise be able to spare the time to share their views.
- A2.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A2.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A2.6 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

- A2.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A3. Consultation coversheet

BASIC DETAILS

Consultation title: organisation realise

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts? _____

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A4. Consultation question

Question 1: Do you agree that Ofcom should give its consent to the reductions in AM (medium wave) transmitter coverage proposed by Absolute Radio? If you do not agree, please give reasons.

A5. Absolute Radio's broadcasting licence

This Annex is published as a separate document.

A6. Absolute Radio's submission

This Annex is published as a separate document.