



MAXXWAVE

Ofcom consultation to reduce Absolute Radio coverage

Maxxwave Response

Contents

Page 1/2 - Overview response to consultation

Page 3 - Site by site analysis of Absolute Radio proposals

Page 4 - Reference offer by Maxxwave to provide replacement transmission sites

Overview

We do not feel that as a company it would be proper to directly respond either for or against the question as worded within the consultation, since we are neither a listener nor a stakeholder in the radio station.

However we do feel that the removal of some of these sites would have a negative impact upon the network overall and that there are suitable alternatives at a far lower cost than has been proposed.

Maxxwave owns and operates over 150 radio sites around the UK. Around 30 of these we believe to be suitable today with minimal effort for AM transmission, and another 30 could be made suitable with re-engineering works (such as complete mast replacement).

We believe that Absolute Radio could offer a substantially better service than is currently being proposed for around **£130k/annum** with around **£90k setup costs**. This is a total cost for all sites based upon a Maxxwave Total Broadcast Contract using our own transmitter sites. This is a fraction of the costs quoted by Arqiva, and are based upon complete equipment replacement and new site build, therefore having no reliance upon Arqiva or the existing dated equipment. We detail this within our reference offer.

Furthermore we feel there is a further consideration that if Absolute Radio were permitted to leave the transmission sites identified then this may subsequently endanger the viability of other radio stations which use these sites and thereby benefit in a reduction of costs from shared occupation.

We have no comment on the proposed power reductions at the main sites. Whilst night-time skywave interference has reduced, electrical interference within towns and cities has increased considerably, and we are working with other AM broadcasters to actively increase power and coverage due to this phenomena, so are surprised that Absolute would be happy with the resultant signal issues.

Our opinion is that at Plymouth, Redmoss and Redruth then since there are numerous sharers then Absolute leaving the site will make little, if any, difference to the viability of other stations transmission arrangements.



MAXXWAVE

Conversely we feel that at Hull, Torbay, Chesterton Fen and Sheffield that Absolute leaving could significantly affect the financial viability of other broadcasters transmissions from those sites also. In all 4 cases Maxxwave has suitable alternative sites on offer (although at our Torbay replacement site we would have to carry out a major site rebuild, costing in the region of £25k and taking 6-9 months to complete).

We feel that the closure of the Scotland and Cornwall sites will not cause issues, since these are at the peripheries of existing coverage and will not leave holes in coverage between sites.

However some sites bridge gaps between other sites, such as Hoo, Pirbright, Chesterton Fen and Swindon. Closure of these sites would change the nature of the coverage overall, removing the feel of a contiguous coverage and instead making the coverage appear in some situations as disconnected "islands" of coverage. We feel all possible efforts should be made to either retain or replace these transmitter sites otherwise the entire service overall will suffer considerably due to lack of core contiguous coverage.

In summary therefore we feel that our offer is commercially extremely attractive and the problems associated with removing certain sites would far outweigh the cost of using our alternative transmission facilities that are being offered.

We feel the key problem associated with the removal of certain transmission sites is that large gaps will appear within the core coverage area, reducing the quality of the entire AM service overall.

The coverage of the DAB networks has been cited. However we feel the comparison is invalid, since the DAB networks do not have large holes of coverage within their core area, instead it is smaller pockets dispersed around the UK. What is being proposed here will open up large holes within the core coverage of the network.

Whilst we recognise that Ofcom cannot force Absolute Radio to take transmission facilities from any provider, we would be very keen to work with Absolute Radio and enter into commercial negotiations. Our offer considerably changes the dynamics of the proposal, such as 4.12 within the Ofcom consultation, since the costs would no longer double and 4.13 therefore is not correct.

Since we have some transmitter sites in more suitable locations than the current Absolute transmitters that will be shut down we believe with our proposal it is possible that there could be a net GAIN in population coverage overall from the changes.

Maxxwave suggested action plan

Many of the areas that Absolute proposes to remove transmitters are on the peripheries of coverage and serve no purpose for bridging gaps between other transmitters. We agree these can be removed with minimal impact.

Other transmitter sites are more central to England in greater populated areas. For this reason Maxxwave already has sites in these areas, further evidencing the potential importance of these sites.

We propose that these sites should either be retained or we are happy to enter into commercial discussions with Absolute Radio about providing replacement transmission services in these areas.

Current Site	Frequency	Sharers	Maxxwave Alternative(s)	Action
Plymouth	1215	Radio 4, Smooth, Talksport	None within timescales given	Remove
Redmoss (Aberdeen)	1215	Radio 4, 5 Live, Radio Scotland, Talksport, Original 106FM, DAB	None within timescales given	Remove
Hull	1215	Talksport	High Hunsley	Replace
Torbay	1197	Talksport	Alternative available, but not within timescales given	Remove
Redruth	1215	Radio 4, 5 Live, Radio Cornwall, Talksport	None within timescales given	Remove
Hoo	1197	None	Detling Hill	Replace
Greenside Scalp	1242	Talksport, Tay 2	None within timescales given	Remove
Wallasey	1197	Radio Merseyside, Talksport	Liverpool City	Replace
Pirbright (Guildford)	1260	None	Guildford, Reading, Basingstoke, Coombe Hill (Newbury/Andover)	Replace
Chesterton Fen	1197	Radio Cambridgeshire	Swaffham Bulbeck, Huntingdon	Replace
Rodbourne Sewage	1233	None	Swindon, Marlborough	Replace
Sheffield	1233	Radio Sheffield	Sheffield	Replace



MAXXWAVE

Maxxwave Reference Offer

Maxxwave is hereby making a reference offer to Absolute Radio for providing transmission services that will give equal (or in some cases better) coverage to that currently obtained from the Hull, Hoo, Wallasey, Pirbright, Chesterton Fen, Swindon and Sheffield transmitter sites.

Our proposal is to purchase new modern transmitters, install necessary antennas on our existing sites, commission the installations and provide monitoring and maintenance across the license period (until April 2022).

The transmitter sites proposed are as follows:-

Direct Replacements

Hull - To be replaced by Maxxwave High Hunsley

Hoo - To be replaced by Maxxwave Detling Hill

Wallasey - To be replaced by Maxxwave Liverpool

Sheffield - To be replaced by Maxxwave Sheffield

Direct Replacements or potential alternative sites that would improve coverage

Pirbright - To be replaced by Maxxwave Guildford. However we have other sites in the area that may be better located, giving a net improvement upon existing coverage.

Chesterton Fen - To be replaced by Maxxwave Swaffham Bulbeck. However we have other sites in the area that may be better located, giving a net improvement upon existing coverage.

Rodbourne Sewage (Swindon) - To be replaced by Maxxwave Swindon. However we have other sites in the area that may be better located, giving a net improvement upon existing coverage.

As can be seen, in 3 areas whilst we have direct replacements, we also have alternative sites nearby that would actually improve upon the current situation. This perhaps would compensate somewhat for the loss of coverage elsewhere. Our estimates are that these proposed alternatives could result in a net GAIN of population coverage, despite still turning off several other transmitters around the peripheries of the country.

Financial terms:-

Total initial contribution towards purchasing equipment and installation:- **£90,000**

Total annual contribution towards electricity, rates, monitoring and maintenance:- **£130,000 per year**

We understand these costs to be less than the costs of running just one of the high power main transmitter sites that Absolute will be retaining alone.