

## Consultation response form

<b>Consultation title</b>	Nation Radio (Ceredigion): Request to change Format
<b>Full name</b>	Alex Geairns
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Harlech Properties Limited

## Your response

<b>Question</b>	<b>Your response</b>
<p><b>Respondents are invited to comment on whether they agree with Ofcom's preliminary view and to frame their views and responses with reference to, or in the context of, the statutory criteria in section 106(1A) of the Broadcast Act 1990 (as amended).</b></p>	<p>Section 106(1A) of the Broadcast Act 1990 covers when OFCOM may consent to a departure from the character of the licensed service. Taking these four points in turn in relation to the application by Nation Radio Ceredigion, we note the following:</p> <p><i>(a) that the departure would not substantially alter the character of the service;</i></p> <p>The changes bring the proposition back towards the service as it currently stands, which in the original application Nation had dismissed as not being financially viable. There is no reference as to why this has suddenly changed, and without transparency on their thinking it does come over as either incompetence or they were not being completely truthful in their original application.</p> <p>Either way, this is not the behaviour of an organisation which OFCOM should have any faith in.</p> <p><i>(b) that the departure would not narrow the range of programmes available by way of relevant independent radio services to persons living in the area or locality for which the service is licensed to be provided;</i></p> <p>There is still no mention of provision of Welsh language programming, meaning that half of the people of Ceredigion are not being served by ANY independent radio services. Such programming will be left to the BBC and community radio broadcaster Radio Aber, which in its current footprint does not serve the entirety of Ceredigion, just Aberystwyth and its surrounding villages.</p> <p><i>(c) that, in the case of a local licence, the departure would be</i></p>

*conducive to the maintenance or promotion of fair and effective competition in that area or locality; or*

As far as independent local radio is concerned, there isn't a service specific to Ceredigion, and there is still no evidence to suggest that the county will be treated with the angles that will be designed for the specific local communities in the broadcast footprint.

Our previous response to Ofcom on the original licence application notes how different Ceredigion is to its surrounding counties, particularly in terms of politics and social demographics, demonstrating that one size certainly does not fit all.

*(d)that, in the case of a local licence, there is evidence that, amongst persons living in that area or locality, there is a significant demand for, or significant support for, the change that would result from the departure.*

The evidence that there is demand for moving back towards the licence as originally awarded comes from listening figures. These have nosedived during the last decade, while within Nation's curation of the service, hence all the changes they have introduced, if not demanded, have made have made things worse, not better.

There is the veiled threat sidebar in the latest submission that Nation may well move back to their original plan of having the three Ceredigion transmitters as a relay for an all-Wales service. It's possible this will then be merged into a whole-UK service in due course. This is supposed to be LOCAL commercial radio, and regardless of OFCOM guidelines there is no getting away from the fact that such moves would be far from local. There is no content creation guaranteed within the Ceredigion broadcast footprint.

"Commercial" suggests an audience is required, and it appears local listeners are an inconvenience rather than what a service should be there to serve – and this should be above everything else. Listeners beget profits, but this seems to be ignored. There comes a time when reducing service quality becomes a real turn-off, and the business model collapses. Nothing Nation has put forward suggests they have any answers to making the service sustainable. In our previous submission we forensically analysed such problems with Nation, a national broadcaster unable to cater for local audiences.

It is with this in mind that we suggest the licence is, in effect, extended for a further year and retendered in June 2020. Nation would therefore have 12 months to prove they have viable answers to enhancing the longevity and 'localness' of the service.