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10 October 2022

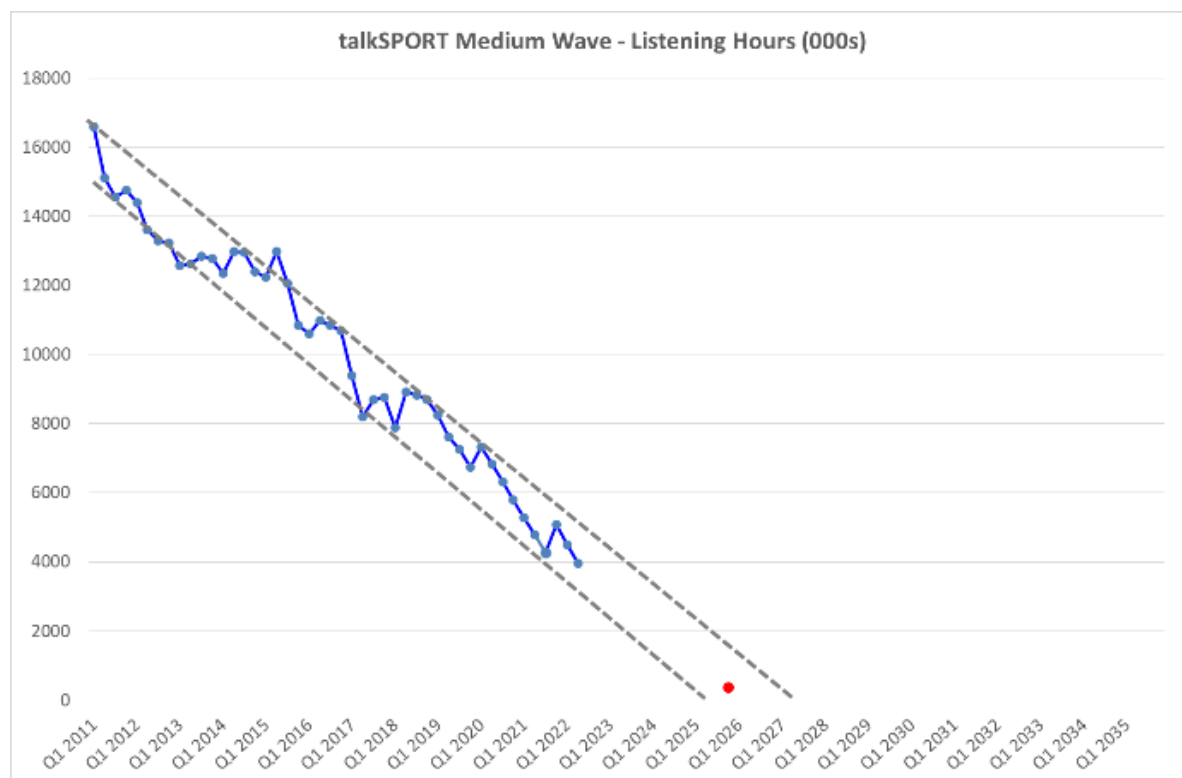
Dear Paul,

talkSPORT Medium wave transmitter reduction request

We write to seek Ofcom’s approval to switch off up to seventeen (17) of talkSPORT’s existing twenty-two (22) AM transmitters, reducing talkSPORT’s national medium wave transmitter network to five (5) core high power sites.

As part of the DCMS Audio Review, a key recommendation was that “*industry should begin planning for the long-term retirement of analogue services. BBC, Wireless and Bauer (operators of national MW services) should develop a plan for the migration from AM services to take place at some point in the mid-2020s.*” We have commenced discussions with Bauer and the BBC around developing such a migration plan and note that the BBC has recently announced its intention to cease transmissions of 5Live on medium wave no later than December 2027.

In talkSPORT’s case, based on current projections, its AM network may become unviable by early 2026.



Given the Government’s objectives in respect of energy efficiencies and against the backdrop of the current energy price rises, crystallising energy savings has also become increasingly important.

In light of this policy context, audience data, and desire to streamline the Ofcom approval process, talkSPORT is therefore seeking the flexibility to close all but five of its core high power sites without further recourse to Ofcom.

In terms of population coverage, the current network reaches 95% of the population. Moving to a five site network will only reduce coverage by ten percentage points to 85%.

	66dBµV/m People 15+	72dBµV/m People 15+	66dBµV/m % 15+	72dBµV/m % 15+
talkSPORT 22tx	49.48m	46.64m	95.0%	89.5%
talkSPORT 5tx	44.28m	39.49m	85.0%	75.8%

Source: Arqiva

The high power five site Network consists of the following sites: Brookman’s Park, Droitwich, Moorside Edge, Westerglen and Washford.

The seventeen other sites that talkSPORT is seeking the flexibility to close once they become unviable are:

Dumfries	Clipstone
Kingston Upon Hull	Duxhurst
Fern Borrow (Bournemouth)	Wallasey
Greenside Scalp	Lisnagarvey
Fareham	Boston
Stockton	Wrekenton (Newcastle)
Lydd	Postwick
Southwick / Brighton	Rusthall (Tunbridge Wells)
Dartford Tunnel	

Of these seventeen sites, analysis of RAJAR data by talkSPORT suggests that currently there are four (4) sites that may already be unviable¹ and which therefore are candidates for immediate closure. These sites are:

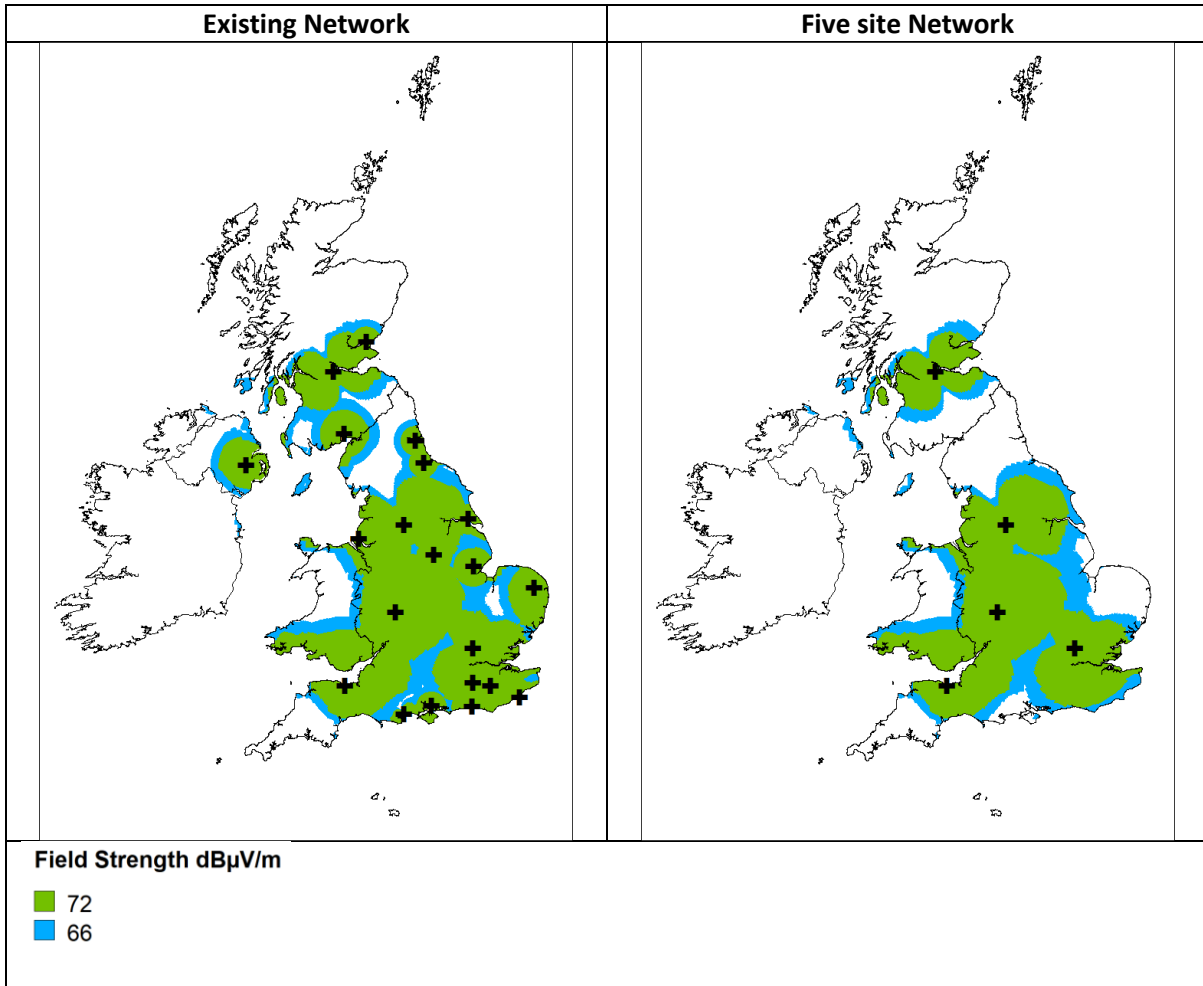
Transmitter Site	AM Hours (000s)	AM Reach (000s)
Dumfries	21	19
Kingston Upon Hull	52	11
Fern Borrow (Bournemouth)	5	3
Greenside Scalp	33	6

Source: RAJAR Q2 2022, 12-mth data

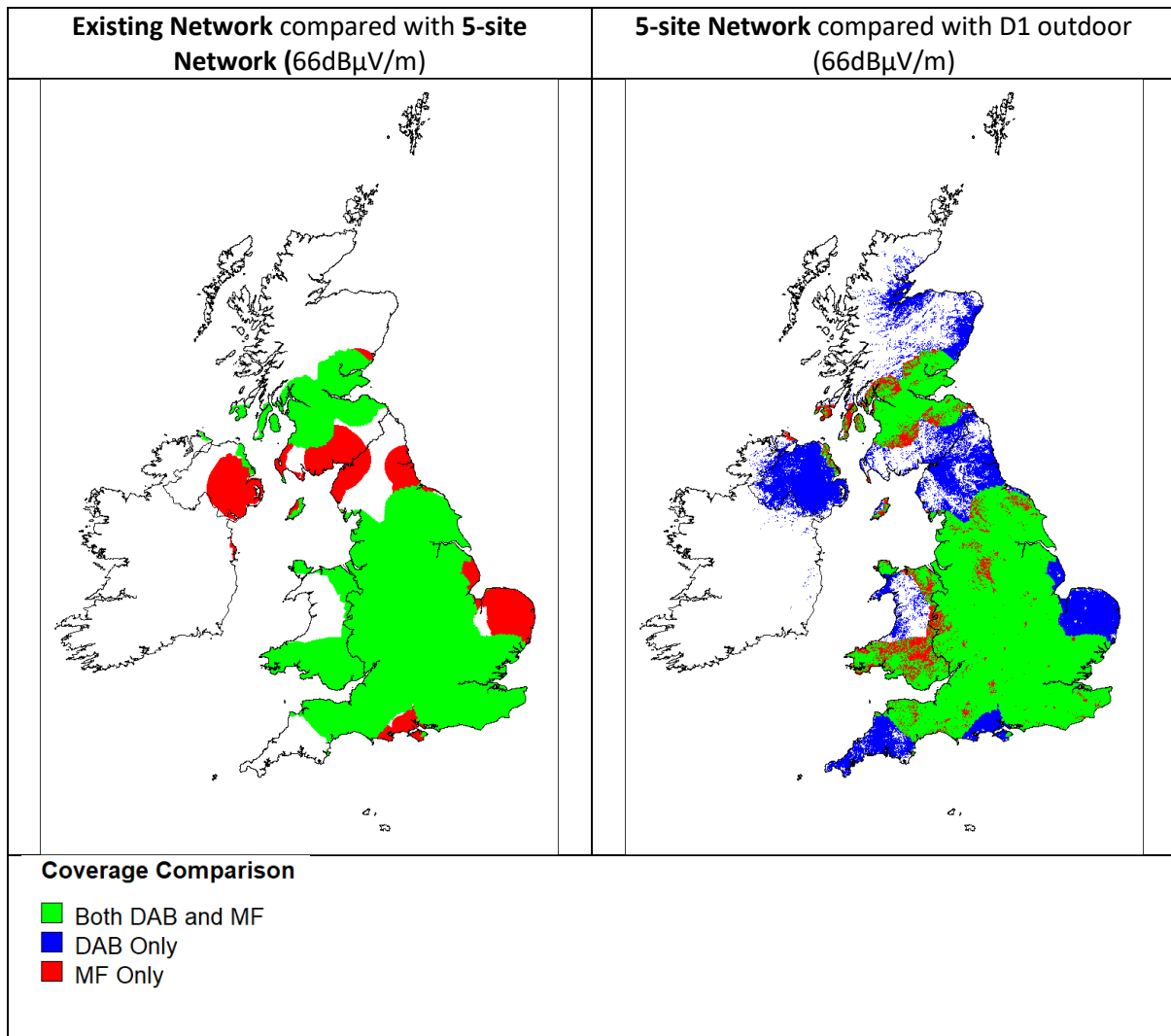
¹ We define “unviable” by measuring listening hours delivered via the AM platform within each transmitter coverage area, and assessing the commercial value of those listening hours against the cost of operating each relevant transmitter site. Our analysis is ongoing and we are currently working with RAJAR to refine our understanding of platform listening data.

While there are currently four sites that appear to be unviable, we expect this number will increase over the next two years and intend to study closely the next wave of RAJAR data due to be published later this month.

The impact of moving from the current network to a five site network is illustrated in the coverage maps below.



The move to a five site network will remove AM coverage in Northern Ireland, the Scottish Borders, the North East and East Anglia. However, as illustrated in the maps below, DAB coverage is available in most, if not all of these areas.



This DAB coverage is in addition to talkSPORT's Freeview, Sky, Freesat, Virgin Media and online distribution.

Next Steps

We are committed to placing our audience at the heart of decision making about medium wave site switch offs. Subject to Ofcom approval, talkSPORT will confirm and proceed with a rolling programme of site closures. Based on our most recent viability analysis, we envisage as commencing with the four sites identified above. We plan to continuously monitor listener data and feedback with a view to closing further sites up to the seventeen identified.

Wherever sites are confirmed for closure, we are committed to alerting affected listeners with effective, targeted and timely communications with a view to migrating them to our DAB, DTV and online platforms.

As audiences continue to migrate away from AM, and in the context of wider industry planning, we would then revert to Ofcom for separate approval in the event we proposed to close the remaining five core sites.

We would welcome opening a dialogue with the relevant Ofcom personnel about the best route forward with this proposal and look forward to hearing from you soon.

Yours sincerely,



Jimmy Buckland

Director of Strategy, News Broadcasting