

**Sent:** 28 June 2011 21:31

**To:** Andrea Jackson

**Subject:** Proposal to extend the Exeter and Torbay DAB service to North Devon

**Importance:** High

Dear Andrea,

I wish to provide some input to this consultation. I hope that you will consider the below even though for reasons which will become clear I have not used your online questionnaire form.

**Context:**

I am the Managing Director and Owner of .....based in North Devon but operating worldwide. I was born and raised in North Devon and continue to live there. I therefore have the insight of a genuine local radio listener and of someone from the broadcast industry.

As an individual and as a company we have no financial interest in any of the radio companies who may have an interest in the local radio licence for North Devon. Global Radio and The Voice are both occasional customers of ours.

I would prefer my comments to remain anonymous when published. These comments are my own personal views and therefore represent only myself.

**Viewpoint:**

The whole problem with your consultation on DAB in North Devon is that it is not the real question that people want to answer. Because of the constraints of your own rules and procedures (whether self inflicted or not) you will find that the people of North Devon will reject a pretty insignificant and innocuous extension of DAB coverage because of the (non DAB related) consequences of it being permitted: i.e. the automatic extension of the local commercial radio licence for the incumbent. Personally I think that were there not this link you would have received virtually no feedback to your consultation. North Devon has already of course got national DAB services and receiver uptake is reasonably poor and so extending a regional service onto a DAB multiplex would probably have been met with the characteristic North Devonian apathy towards technology! However, this isn't the case. Therefore the undoubted rejection of the proposal by the local population will be due to this link to the licence renewal.

Heart (Global) have done what any sensible business would and should have done. Changes in the rules have allowed them to create a very streamlined and efficient radio service on a regional/national level. They have worked within the rules and I certainly have no argument with their business activity. However, there has been a consequence: North Devon no longer has a local radio station. It has a popular music station which has Devon wide news on it (so a slightly younger version of BBC Radio Devon albeit that it is aiming for a lower age market now too) but no matter what emphasis Heart put on it the side effect of

regionalisation is that you cannot satisfy the localness of two areas as different as North Devon and Exeter/Torbay/Plymouth. This is a problem the BBC have struggled with for years and if it wasn't Heart with the (commercial radio) problem it would be someone else! North Devon is a bit different...

In the absence of this link to the local licence renewal the extension of DAB is in my opinion perfectly reasonable. It won't transform anyones lives in the area. It may slightly encourage DAB receiver uptake. But no-one will really care either way! I realise of course that DAB provides a technically inferior product to FM and is a massively out dated technology that could be vastly improved with an alternative coding system but equally it is clear that the will of Government is to see many services migrate from FM to DAB: at least now in a more sensible timescale than the ridiculous one imposed by the previous Government.

It seems pointless therefore for me to answer your prescribed questions.

I would just urge OFCOM in this instance to show some leadership, identify that whatever the existing rules may be that there are special circumstances here (not the least that unlike virtually any other area in the SW there is no alternative local licence e.g. Exeter FM, Palm FM, Plymouth FM, Atlantic FM, Pirate FM, Total Star Somerset, Midwest Radio, Nova WSM, Jack Bristol, The Breeze Bristol etc, etc) and whilst this may be for perfectly sensible reasons of viability it does mean that the one licence that is available should not be treated lightly and effectively disposed of.

I would be happy to answer any specific questions you have about my submission.

Regards,