

**Title:**

**Forename:**

**Surname:**

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep name confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Additional comments:**

**Question 1: Do you think that allowing Now Digital to extend the coverage area of its Exeter & Torbay local radio multiplex licence to include North Devon would unacceptably narrow the range of DAB programme services available in the Exeter and Torbay area? Please explain the reasons for your view.:**

No it wouldnt

**Question 2: Do you think that allowing Now Digital to extend the coverage area of its Exeter & Torbay local radio multiplex licence to include North Devon would be calculated to maintain or promote the development of digital sound broadcasting in the UK otherwise than by satellite? Please explain the reasons for your view.:**

Yes it promote DAB

**Question 3: Do you think that Now Digital's proposals for providing coverage of North Devon are satisfactory? Please explain the reasons for your view.:**

The plans are not satisfactory. Looking at the plans, why include Okehampton and not Ilfracombe? Okehampton is not part of North Devon whereas Ilfracombe is. The coverage promised from the DAB transmitters when FM is turned off will leave Ilfracombe without any local radio service however one describes it , either commercial or BBC

This will leave the North Devon coastline and Bristol Channel coastline villages and hamlets in a media wilderness

Just recently the North Devon Gazette newspaper has withdrawn free circulation of the newspaper from villages like Combe Martin and Berrynarbor. This are just two of the areas to be affected by these plans

**Question 4: Do you consider that Now Digital has the ability to maintain its local radio multiplex service if its request is granted? Please explain the reasons for your view.:**

Yes

**Question 5: (For programme service providers on the Exeter & Torbay local radio multiplex only) Do you consider that there are sufficient safeguards in place to protect your rights and interests in the event that Now Digital is permitted to extend coverage to include North Devon?:**

Looking at the proposals North Devon will have its own local multiplex and this wont affect the South Devon stations

**Question 6: Do you consider that there any other grounds on which Ofcom should approve, or not approve, the request from Now Digital? Please explain the reasons for your view.:**

The Myers Review ("The Review") sited within the opening few paragraphs how all media including radio are experiencing difficult conditions as we have seen by the consolidation of the ITV regions.

The Review also stated "Radio is important to the very fabric of our society, and local radio particularly so". In Mr Myers comments in his introduction he stated how hard and fast changes would need to be applied and "The Prize for all is a radio industry that can remain the envy of the world, and where "localness" is it's DNA."

The Review goes on by saying "that radio stations of the future will either have to be truly "global" or truly "local" to mark themselves in this crowded marketplace....if you are the only radio station super serving the needs of a particular community, you will continue to attract

an audience that cannot obtain local information, news, weather and what's on information from any other station"

The Review quotes OFCOM Chief Executive Ed Richards from his 2007 Annual OFCOM Lecture : Citizens and Consumers in a Converged World, given on 16 October " Some have called for a huge relaxation of regulation in relation to localness...they believe that localness is either no longer valued or that its value is significantly outweighed by cost. What our research tells us is that people continue to want to hear local programming. They want to hear that programming and know that the presenter they are listening to drives down the road they drive down."

Balancing the "localness" and profitability of a radio station is at the core of all these decision. Once again this was recognised within The Review. Interestingly the Review indicated the listener was of importance. "If we agree that listeners should sit at the Heart of local stations' output...such ambition must be fuelled by reality and practicality The Review went on to list a series of recommendations to be applied to the industry. It was felt that the "listeners interests would be safeguarded"

It is apparent and made reference to in The Review that consumption of Local Radio has remained robust in recent years. Some 90% of the adult UK population use Radio in some form each week

The MORI poll commission by OFCOM in 2004 showed that out of twenty attributes "local news; local travel news; local weather and issues affecting the local community were among the top 7 selected. "Asked how the desired local content should be executed on radio, respondents were very clear about the attributes of local radio that were important to them: local presenters with local knowledge, the radio station to be based in or near the locality and station staff to be based in the local area"

Throughout The Review, it quotes heavily from the OFCOM: Radio - Preparing for the Future. The majority of the important issues for listeners were local news; events; community news and so forth. "When Respondents were offered the option of more local radio stations or more national radio stations, twice as many opted for new "local" rather than national services". "The majority of respondents "argued that the withdrawal of local stations to a syndicated regional or national level would work against the stations themselves...and they would lose their local audiences"

In reply to the Myers Review OFCOM issued their document. Page 5 of the report has interesting comments: Point 2.8 - "when the financial state of the industry was explained to respondents, many were unwilling to see a reduction in local material and locally made programmes even given the financial challenges" and Point 2.10 in part refers to the rejection of high profile presenters on local radio, when those presenters can be on BBC or National Commercial Radio and would not balance the localness lost by this move

Page 12 discusses the fact that Global Radio could merge the services in Devon into 1. The 2nd largest county in England being served 7 hours a day as a "local" service.

In June 2010 Global Radio announced consolidation of the "Heart" network from 33 to 15 "sites of excellence".

The decision to merge the Devon based "Heart" stations resulted in the closure of sites in Torquay, Plymouth and Barnstaple. The closure of the Barnstaple office left North Devon without an alternative commercial service.

The closure of Heart North Devon, formerly Lantern FM, has caused an outpouring of comments. Many complaints have been sent to OFCOM, including North Devon MP Nick Harvey, Torrington MP Geoffrey Cox; Head of North Devon Tourism from North Devon+. The North Devon District Council have sent OFCOM a letter of complaint

Over 2000 people registered their displeasure at the loss of local presenters on Facebook

The local newspaper the North Devon Journal stated the following "As a media company ourselves we sympathise with the challenges the station faces in this digital era. This is a salutary reminder that 'progress' sometimes comes at a very heavy cost"

The CEO of the North Devon Theatres trust stated how the local North Devon Festival and Theatres programmes bring a staggering £15.2 million of income to the area, much of which can be attributed to local radio and the power of response of the listener

The North Devon Hospice write it is a "devastating blow".

The North Devon Council is in "fear that most of our information won't be broadcast" and earlier in June 2011 issued a Press Release calling for the local FM radio service to be introduced into North Devon

The Head of rural Bratton Fleming Primary School state a local service is "paramount for staff and pupil safety"

The views of many businesses back up the respondents to the OFCOM survey on Radio Preparing for the future. There has been an immediate switching off in the area, many stating they are listening to other services and will not be renewing the advertising. The local papers have printed letters from listeners and businesses at the shock of the loss of local radio

Hundreds of people have stated how they back the need for a local commercial service in North Devon, with 100% agreement that Exeter is not local to North Devon.

Many more are contacting from all around the county at the demise of local radio with many complaining of mis-pronunciation of place names, lack of coverage and more.

Northern Devon is generally regarded as something of a unique area connected by the A361 which acts as an umbilical chord with the M5 and the rest of the country. Northern Devon differs in many ways from the rest of Devon (the second largest county in the country) and Northern Devonians have always regarded themselves as belonging to a county within a county. As a result, the loss of the local radio station to that of regional basis, which cannot hope to offer the level of local input, is regarded with dismay and a total lack of understanding.

Despite areas of North Devon being within the worst 10% of deprivation in the Country, North Devon has proven to be particularly generous to local charities witness the North

Devon Hospice who enjoy donations of TWICE the national average per head of population.

Given the geographical size, Northern Devon not only needs but demands immediate response to local difficulties. Therefore a true local radio designed to enable listeners and local authorities to advise of Road Accidents/Blockages/Closures, School Closures, Ward Closures/Alerts at the Local Hospital, breaks and updates in the supply of Gas, Electricity or Water supply is required. These difficulties would be immediately passed on to listeners by the live presenters as they come in, enabling listeners to make any alternative arrangements to their plans.

The recommendations to extend do not safeguard the listeners interests and are contrary to some of the points in the Myers Review.

Also Ed Richards in his speech at Radio 3.0 (which is quoted on the OFCOM website) said "At the same time, to meet the very clear demands of audiences, we want to ensure it remains truly local"

Having a regional service simply which provides a local advert output is not local radio and in fact is not counted as localness within OFCOM rules

One also asks the question: Do the new Heart/Capital stations fulfil the localness guidelines. These are quoted from the OFCOM website :

We take local material as defined to mean, amongst other things:

- \* A listener should get a feel for an area by tuning in to a particular station, and have confidence that matters of local importance, relevance or interest to the target audience in the area will be broadcast;
- \* This should include programming of specific local relevance which also offers a distinctive alternative to UK-wide or nations' service;
- \* It should include content drawn from, and / or relevant to the station's licensed area;
- \* Licensees should be able to identify a range of output which is specifically relevant to their local area;
- \* Programming should be likely to give listeners a feeling of ownership and / or kinship, particularly at times of crisis (snow, floods etc).

The output presently given by Heart Devon certainly does not do this to the listener in North Devon. With these proposals it will allow the present Heart service to continue and to ignore these guidelines and North Devon will have to suffice with a poor "local" service whilst having a professional "quasi national" provided.

The DAB extension is not good for listener choice and not good for North Devon