

Tony Close  
Director of Content Standards, Licensing and Enforcement  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

8 May 2019

Dear Tony,

**Request to switch off seven medium wave transmitters**

We write to seek Ofcom's permission to switch off seven (7) AM transmitters in the talkSPORT (INR3) national medium wave transmission network. These seven sites have been selected on the basis of RAJAR data analysis that indicates analogue listening in the respective coverage areas is no longer at appreciable levels due to the evolution of audience behaviour.

The seven sites are:

1. Rosemarkie
2. Redruth
3. Redmoss
4. Londonderry
5. Ocombe
6. Plummers Barracks
7. Pearce's Hill

The current talkSPORT national AM transmission network consists of 28 transmitter sites (excluding road tunnels). Closing the seven sites will not have a material impact on coverage as the Measured Coverage Area (MCA) of the revised 21 site network will remain high at 95% of UK households (from 97%) maintaining the efficient use of the allocated electromagnetic spectrum.

Of talkSPORT's three million weekly listeners, RAJAR data analysis indicates that 1% could be expected to notice any impact of the proposed changes, as listening to talkSPORT via AM in the seven identified areas is low.

Following the decommissioning of the sites, talkSPORT will continue to be available via DAB in all seven areas; and just 1.2% of primary roads will lose either AM or DAB coverage. As a consequence, any disenfranchisement will be minimal.

Of the seven sites identified, five are in areas that Ofcom has already allowed Absolute Radio (the INR2 licensee) to switch off its medium wave transmitters.

## **Background to this request**

Wireless has long been a pioneer in the development of digital broadcasting in the UK. As one of the three INR licensees, talkSPORT was part of the original line-up of services on the Digital One network at its launch in 1999; and over the past two decades has remained a central pillar to the service offering of that multiplex, whilst also contributing significant investment monies to D1's coverage enhancement during this period.

In addition, through its investment in the second national DAB multiplex and the launch of five new digital-only services (talkSPORT 2, Virgin Radio, Virgin Radio Anthems, Virgin Radio Chilled and talkRADIO), Wireless has made a leading contribution to the growth of UK commercial radio and the expansion of digital listening that has resulted, in particular, from the explosion of consumer choice in national digital radio services.

This request to rationalise talkSPORT's analogue network comes at a pertinent time for the industry as it commences the DCMS-led review of UK Radio now that the conditions of the Digital Radio Action Plan have been met.

At the most recent workshop on the future of the Digital Radio & Audio Review it was agreed that the Review would be 'a collaborative process, encouraging industry players to work alongside DCMS to define parameters and carry out research'.

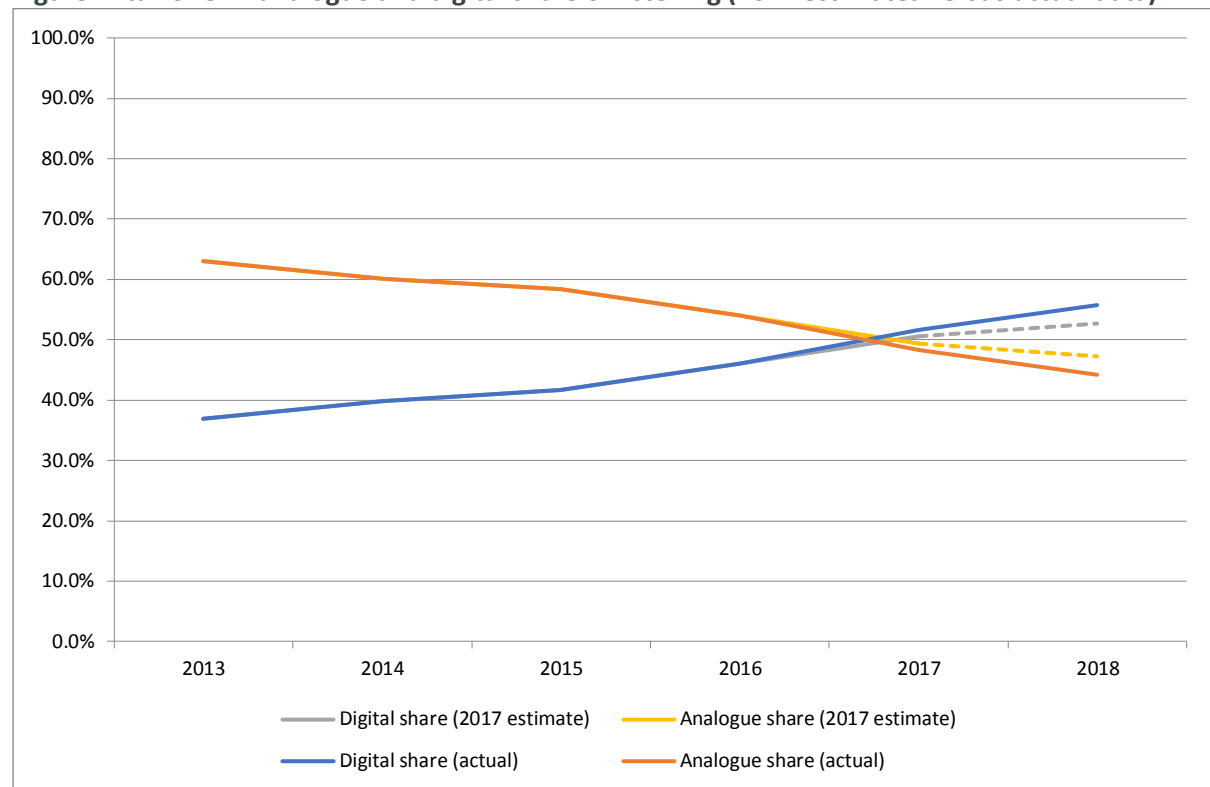
The targeted AM network re-alignment that we are requesting will provide useful empirical evidence in the form of listener data and feedback which could help inform certain elements of the Review while also informing Wireless' strategy as a company keen to future proof its stations and remain in-step with its listeners.

## The Proposal

talkSPORT's INR3 national analogue licence was renewed for a further five-year period commencing 1 January 2018. As part of that renewal process Wireless made an estimate of the levels of listening to talkSPORT by platform.

Revisiting these estimates with actual outturn data reveals that the decline in analogue listening is occurring faster than we anticipated 18 months ago.

**Figure 1: talkSPORT analogue and digital share of listening (2017 estimates versus actual data)**



Source: RAJAR

As a consequence of this decline in audience delivery via AM, Wireless undertook an analysis to assess digital listening to talkSPORT in more detail. This work involved the analysis of 15 of its 28 AM transmission sites, building bespoke Total Survey Areas from the Measured Coverage Area plots of each transmitter.

RAJAR data for each bespoke TSA was then generated to understand overall levels of Reach and Total Hours and also listening by platform (i.e. via AM and DAB) and by location (in particular “in-car” listening).

The areas were then ranked by absolute levels of AM listeners and assessed in turn in order to arrive at the seven sites that have been selected.

**Figure 2: talkSPORT Listening Data by Transmission Area (as at Q3 2018 - 12 Months Data)**

talkSPORT AM Transmitter Site	Location	MCA (000s)	talkSPORT AM Reach (000s)	talkSPORT AM In-car Reach (000s)	INR2 AM switch off area?
Rosemarkie	Inverness	65	0	0	✓
Redruth	Cornwall	244	3	2	✓
Redmoss	Aberdeen	275	5	2	✓
Londonderry	Northern Ireland	119	5	2	
Occombe	Devon	351	6	3	✓
Plummers Barracks	Plymouth	288	8	5	✓
Pearce's Hill	Devon	519	11	6	

Figure 2 above demonstrates that from the transmitters identified, talkSPORT generates negligible AM reach, and at its transmission site at Rosemarkie there is no AM listening at all.

Given a meaningful proportion of the current AM listening takes place in-car, we went on to consider the overlap of talkSPORT's coverage via AM and via DAB. In particular, we undertook to overlay coverage plots of the AM transmitters against that of the Digital One network in that area. These overlay plots are set out in the Appendix.

The high level data are illustrated in Figures 3 and 4 below, which show that while the move to a 21 site network will reduce household and road coverage (albeit marginally), given the overlapping coverage that will continue to be provided via DAB, the reduction will likely be far lower than this (i.e. 0.5% of households for example versus 2.2% for AM on its own). The availability of talkSPORT via DTV and Online distribution means would further mitigate any negative impact.

**Figure 3: talkSPORT AM network coverage**

	28 site network		21 site network	
Households	26,988,723	97.0%	26,337,984	94.8%
Primary roads	44,631km	85.2%	43,252km	81.8%

Source: Arqiva. Figure 3 shows that removing the seven sites from the AM network would result in a 2.2% reduction in household coverage (~650,000) and a 3.4% reduction in primary road coverage (1,379km).

**Figure 4: talkSPORT combined AM and DAB coverage (i.e. MF plus Digital One)**

	28 site network		21 site network	
Households	27,349,072	98.5%	27,254,072	98.0%
Primary roads	46,629km	90.0%	44,749km	88.8%

Source: Arqiva. Figure 4 shows that removing the seven AM sites would result in just a 0.5% reduction in household coverage (~96,000) and a 1.2% reduction in primary road coverage (1,880km).

Of the seven transmitters we have earmarked for switch off five have already had equivalent AM transmitters successfully decommissioned in these regions by Absolute Radio last year.

## Next Steps

Subject to Ofcom approval, Wireless would look to implement the switch off of the seven sites as soon as possible. We would plan to continuously monitor RAJAR data and listener feedback with a view to reviewing any decisions if there is any unanticipated impact. The findings of this exercise may also lead talkSPORT to look at additional sites to option for switch off at a later date as AM listening declines further.

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,

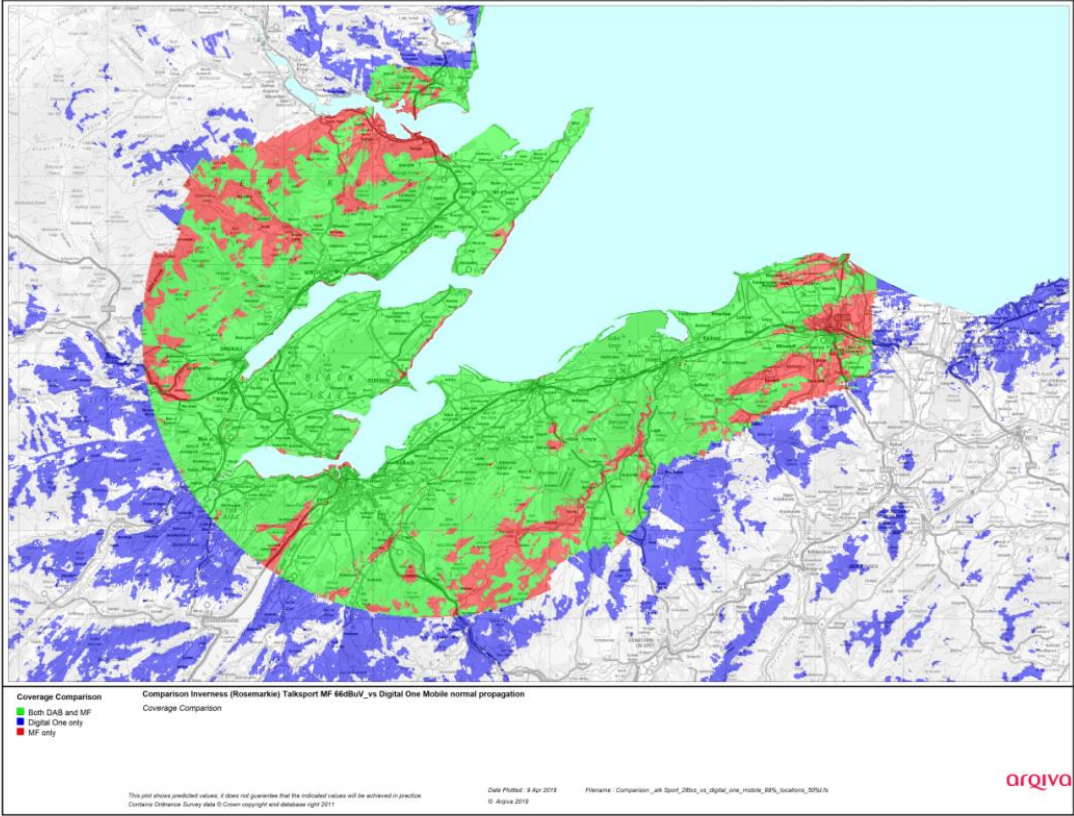
**Jimmy Buckland**

Director of Strategy, Wireless

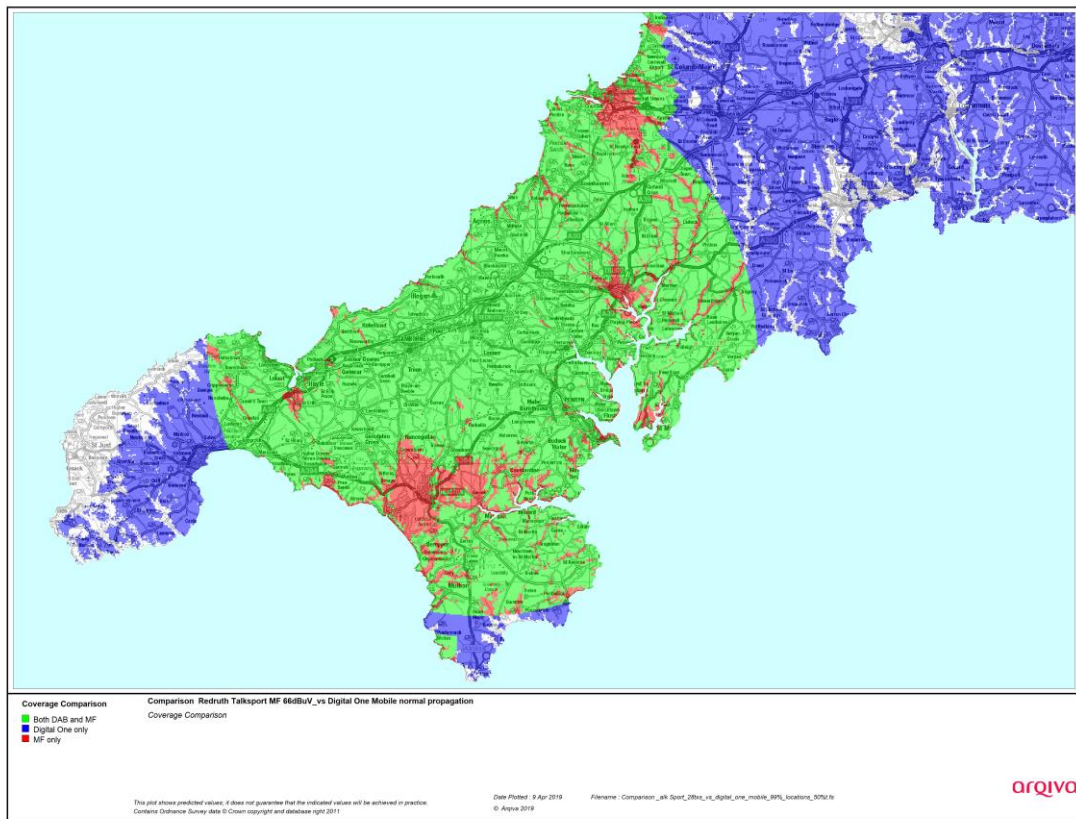
APPENDIX

COMBINED AM AND DAB COVERAGE PLOTS

Rosemarkie

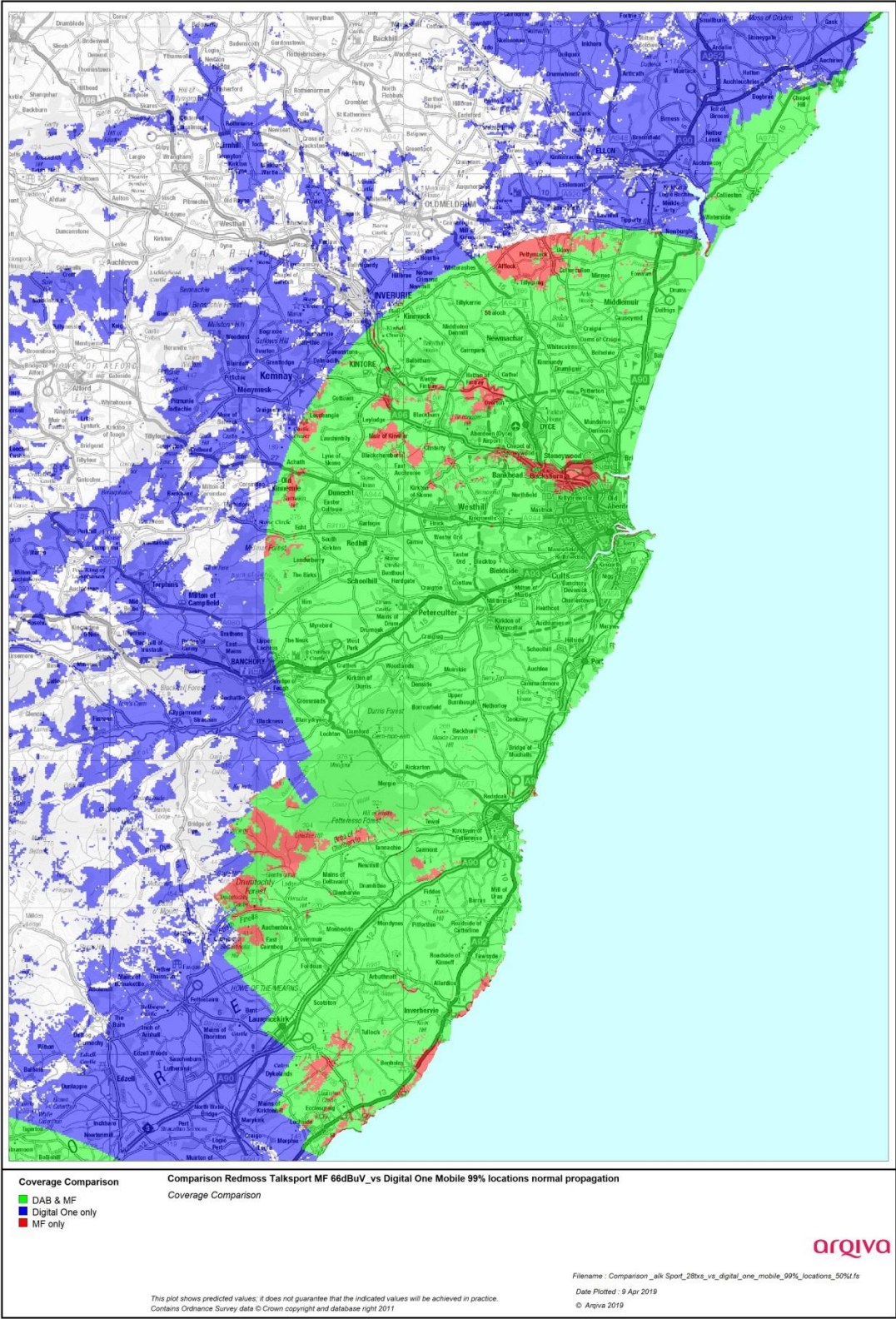


## Redruth



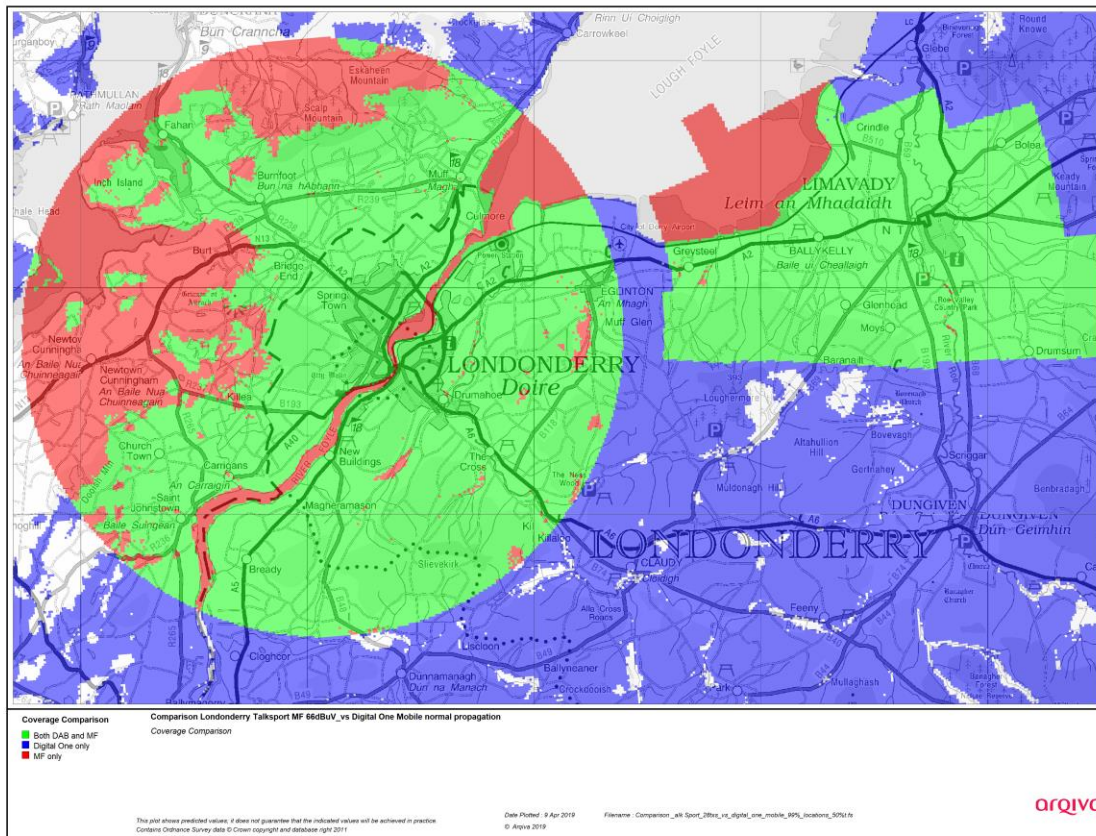


Redmoss

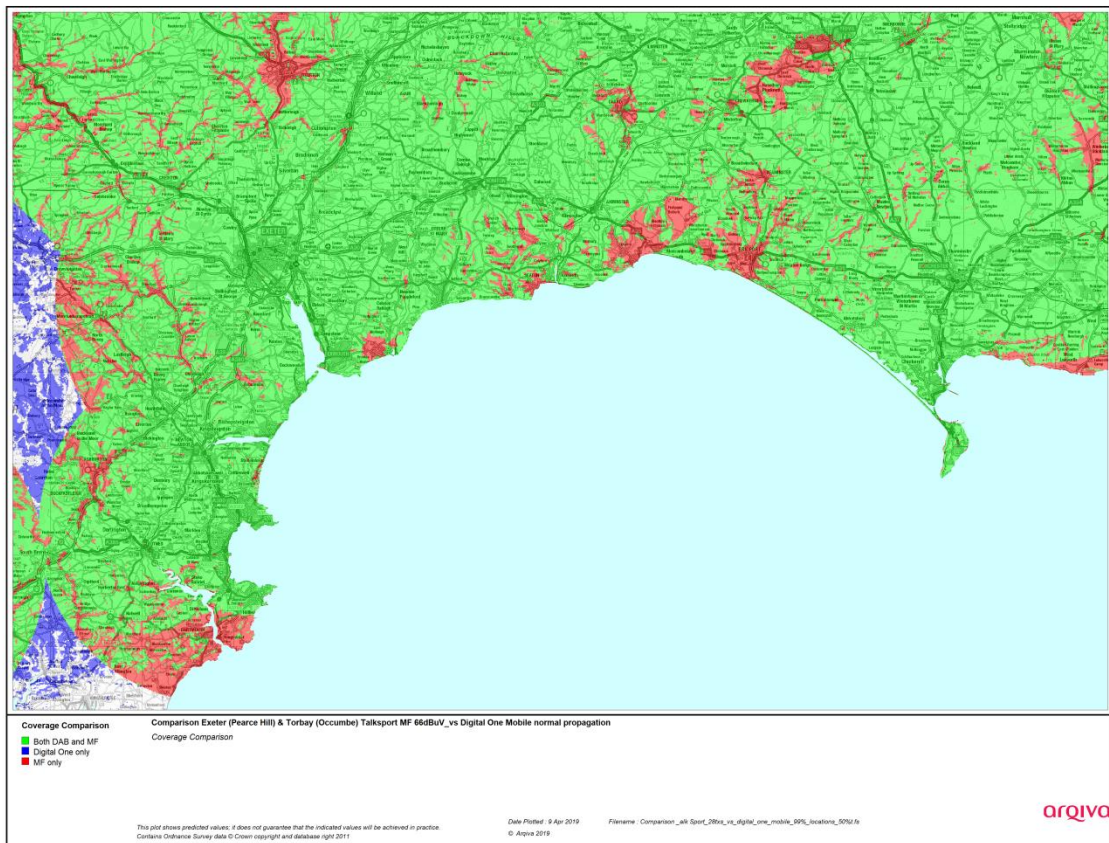




# Londonderry



## Occombe and Pearce's Hill (composite coverage)



## Plumbers Barracks

