

Paul Mercer  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

Dear Paul,

**talkSPORT medium wave transmitter reduction request**

Audience data continue to show the ongoing structural shift in radio listening away from analogue platforms. Given environmental imperatives, and within the context of commercial discipline, it is beholden on talkSPORT to continually ensure its AM transmission network offers the right balance of net consumer benefit and efficiency. As talkSPORT's listeners continue to move over to digital platforms we have refreshed our assessment of the ongoing viability of each of the transmission sites within our national AM network (assessing the audience delivered against the costs of powering each transmitter especially in areas where DAB coverage is excellent), and test the rationale to providing overlapping AM coverage from both high power sites and lower power filler sites.

Following this work, we now write to seek Ofcom's approval to switch off seven (7) of talkSPORT's existing eighteen (18) AM transmitters, reducing talkSPORT's national medium wave transmitter network to a core of five (5) high power sites, five (5) low power sites, and the Dartford Tunnel.

The resulting network would consist of the following sites:

<b>High Power</b>	<b>Low Power</b>
Brookman's Park	Boston
Droitwich	Fareham
Moorside Edge	Postwick
Washford	Wallasey
Westerglen	Wrekenton (Newcastle)
	Dartford Tunnel

The seven sites that talkSPORT is seeking to close are:

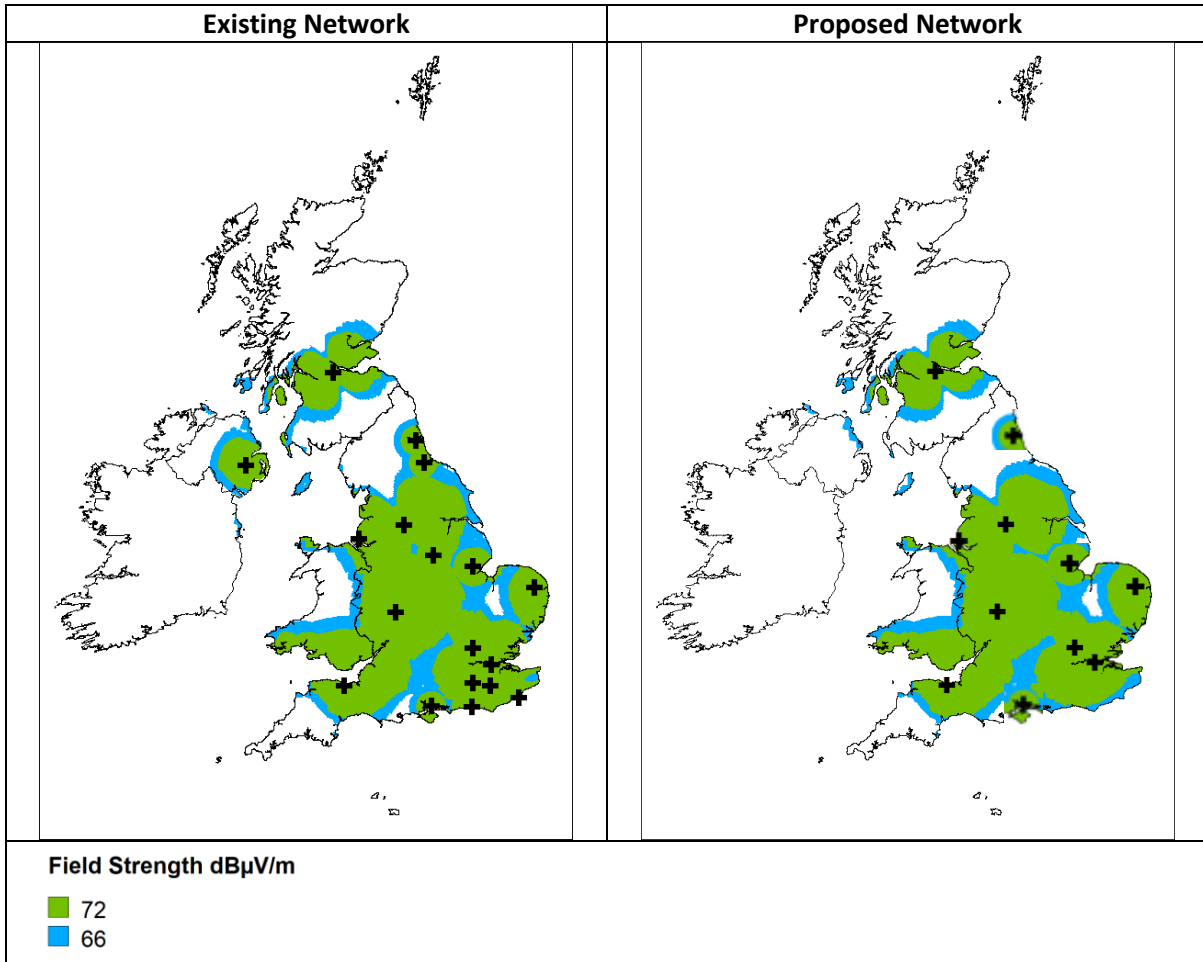
Clipstone	Stockton
Duxhurst	Southwick
Lisnagarvey	Rusthall
Lydd	

In terms of coverage, these closures would reduce the network's current 92.0% population coverage to 88.9% - a change of 3.1 percentage points.

	66dBµV/m People 15+	72dBµV/m People 15+	66dBµV/m % 15+	72dBµV/m % 15+
talkSPORT 10tx + Dartford	46.3m	41.1m	88.9%	78.9%

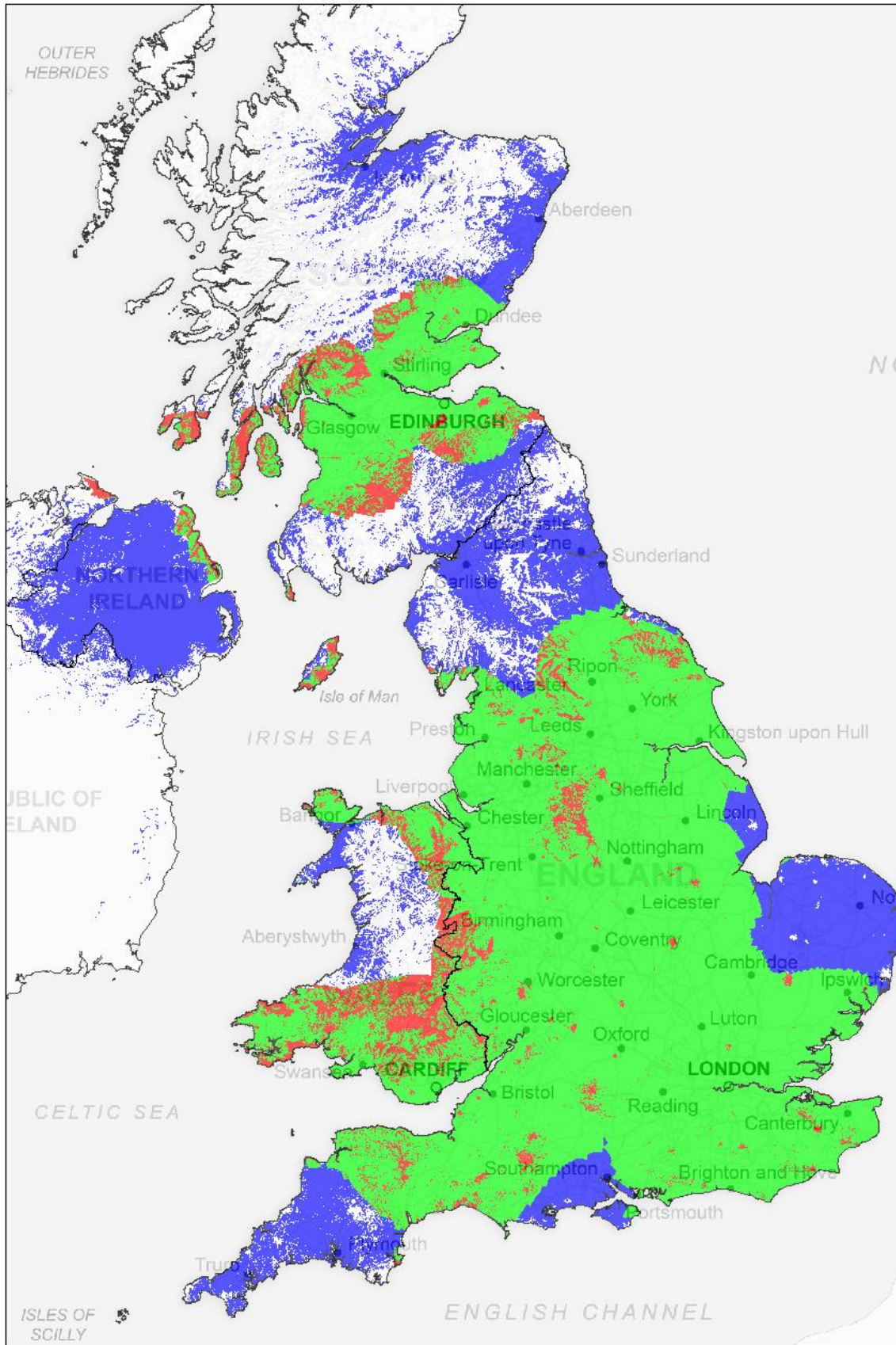
Source: Ofcom, based on 2011 Census data

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



The move to an eleven site network will remove coverage principally in Northern Ireland (where talkSPORT has modest levels of AM listening), though the reduction in filler sites will also have modest coverage effects elsewhere.

However, as illustrated in the map below, which compares the coverage delivered by talkSPORT’s five high power sites on their own, DAB coverage is available in most, if not all of these areas.



**Coverage Comparison**

- Both DAB and MF
- DAB Only
- MF Only

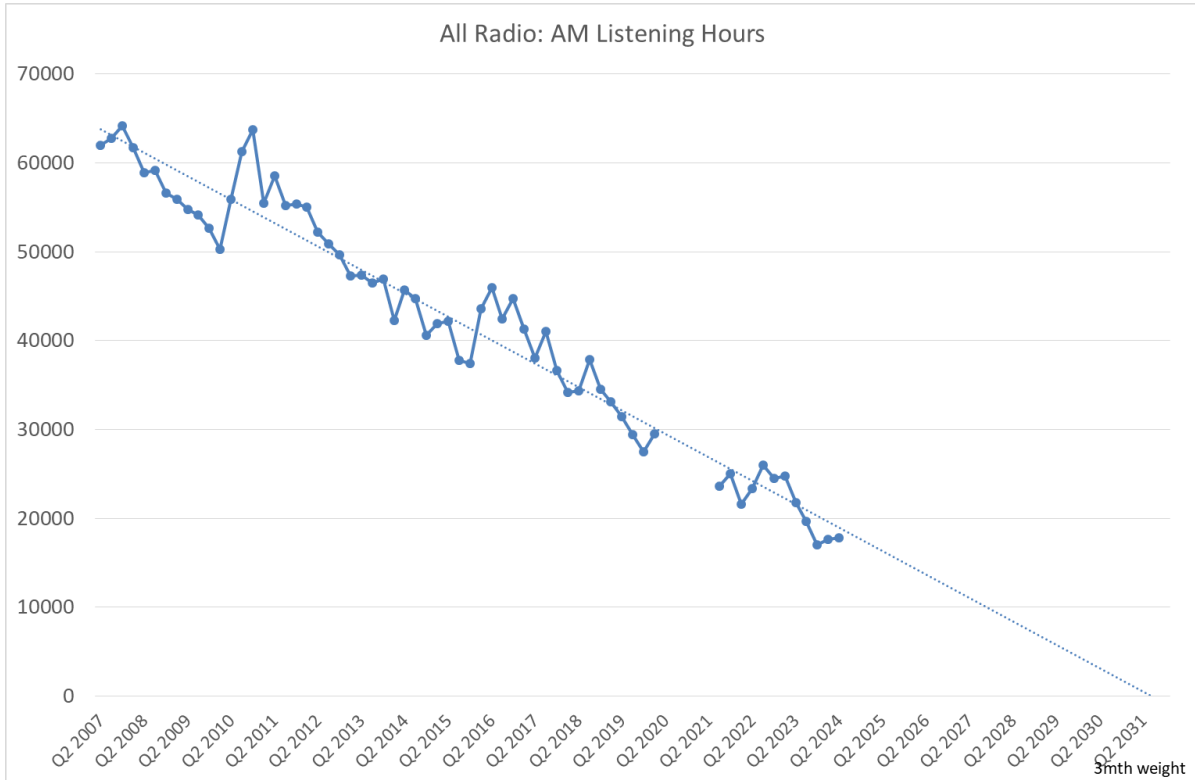
**Talksport 5 transmitters compared with D1 outdoor**

Coverage Comparison

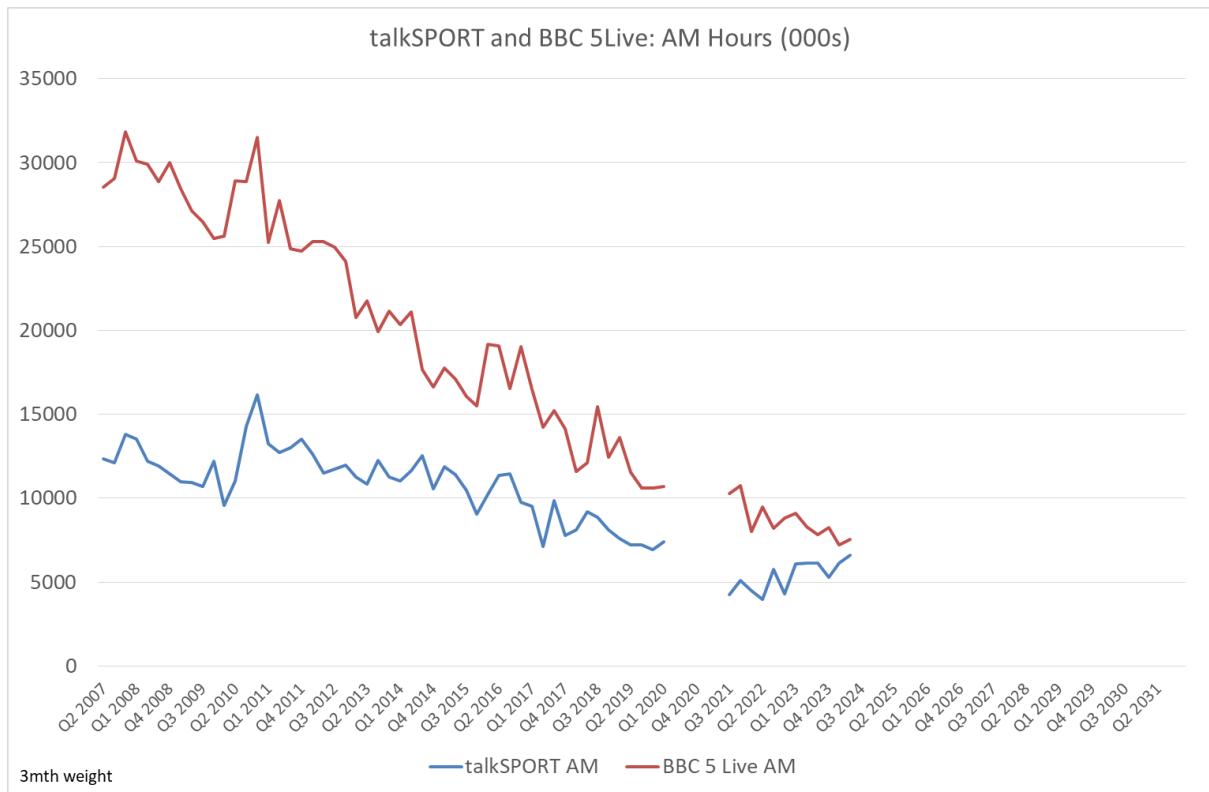
This DAB coverage is in addition to talkSPORT’s Freeview, Sky, Freesat, Virgin Media and online distribution.

**POTENTIAL AUDIENCE IMPACT**

Given the ongoing structural shift in radio listening (as illustrated in the graph below showing the trend in total AM listening over the past 17 years), we expect the audience impact will be minimal, as talkSPORT works to transition listeners over to DAB and online streaming platforms.



To assist in targeted listener communication, we have devised an innovative technical solution that will enable us to deliver AM platform specific messaging. We intend to activate this solution imminently in order to promote the benefits of conversion to digital listening platforms, and in order to prepare audiences in the event of a positive decision by Ofcom.



Given the relatively small number of areas where DAB coverage is unable to mitigate AM coverage loss, we expect talkSPORT's overall net lost listening from this proposal to be low.

AM listening in areas that are not also covered by high power AM sites is just 77,000 hours (less than 0.5% of talkSPORT's total listening). Given the extensive availability of talkSPORT via DAB particularly in Northern Ireland, we expect the vast majority of this listening will remain.

AM SITE NAME	High Power Site Overlap	Q2 2019 (12mth data)	Q2 2024 (12mth data)	CAGR 2019 to 2024
Stockton	Moorside Edge	301	69	-26%
Clipstone	Droitwich	271	158	-10%
Southwick / Brighton	Brookmans Park	179	104	-10%
Lydd	Brookmans Park	155	77	-13%
Fareham		231	91	-17%
Duxhurst	Brookmans Park	591	198	-20%
Wallasey	Moorside Edge	398	360	-2%
Lisnagarvey		164	77	-14%
Rusthall (Tunbridge Wells)	Brookmans Park	864	403	-14%
Boston		88	62	-7%
Wrekenton (Newcastle)		265	121	-14%
Postwick		161	181	2%
<b>TOTAL TALKSPORT AM NETWORK</b>		<b>8,261</b>	<b>6,094</b>	<b>-6%</b>
- AM as % of Total talkSPORT Hours		42%	28%	

This projection of limited audience impact is supported by our experience of having switched off eleven other low power AM sites since 2019. talkSPORT's total listening in those areas before AM site closures was 1.498 million hours (adjusting for growth over the past five years), whilst the total listening hours in the affected areas after AM site closures is now 1.473 million hours – a loss of 0.025m hours. For context, talkSPORT's total weekly listening hours are 22.5 million.

### **Next Steps**

talkSPORT has a loyal audience of passionate, engaged listeners who are central to our decision making. Subject to Ofcom approval, we intend to move swiftly in implementing necessary site switch offs. In doing so we will continuously monitor audience data and proactively respond to any enquiries from affected listeners. We have active plans in place to support this process with effective, targeted and timely communications with a view to migrating audiences to our DAB, DTV and online platforms.

As part of the DCMS Audio Review, a key recommendation was that *“industry should begin planning for the long-term retirement of analogue services.”*...and that *“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.”*

talkSPORT's proposal to move to an eleven site transmitter network has been developed independently and is not expected to have any consequential impact on other AM operators. However we would expect any subsequent planning to form part of a wider process of industry consultation. This is on the basis that further switch off proposals would entail more material market impacts, regulatory considerations and consumer communications requirements.

We would be happy to provide further information about this, or any other matter relevant to our proposal, such as Ofcom would find helpful.

Yours sincerely,



**Jimmy Buckland**

Director of Strategy & Operations, News Broadcasting



## ADDITIONAL INFORMATION:

### talkSPORT - Reach Analysis

AM SITE NAME	Q2 2019*				Q2 2024*			
	Total Reach	AM Reach	AM In-car Reach	DAB In-car Reach	Total Reach	AM Reach	AM In-car Reach	DAB In-car Reach
Dumfries	22	12	12	4	17	3	0	8
Fern Borrow (Bournemouth)	25	14	9	9	25	7	4	9
Kingston Upon Hull	59	30	20	18	57	17	8	19
Greenside Scalp	21	10	7	4	36	12	5	9
Stockton	67	36	20	18	62	19	13	17
Clipstone	119	50	33	38	171	42	25	53
Southwick / Brighton	57	34	19	15	55	16	11	19
Lydd	66	27	20	20	52	16	9	19
Fareham	60	37	26	15	52	20	13	15
Duxhurst	214	115	73	62	166	53	29	43
Wallasey	217	110	61	67	210	74	45	74
Lisnagarvey	58	32	22	12	66	24	13	22
Rusthall (Tunbridge Wells)	387	199	118	106	301	113	68	79
Boston	54	18	15	20	56	12	9	18
Wrekenton (Newcastle)	75	44	22	20	73	23	9	15
Postwick	49	23	16	15	65	24	16	19
<b>TOTAL talkSPORT</b>	<b>3,055</b>	<b>1,590</b>	<b>1,046</b>	<b>874</b>	<b>3,340</b>	<b>1,123</b>	<b>668</b>	<b>1,007</b>
		52%	34%	29%		34%	20%	30%

\* Source: News Broadcasting analysis based on Octagon/RAJAR 12-month weighted data, figures in 000s unless otherwise stated.

## COVERAGE DETAIL: LISNAGARVEY / NORTHERN IRELAND

- **RED** areas indicate coverage loss in the event of turning off the Lisnagarvey AM transmitter

