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## **talkSPORT – proposals to reduce AM coverage**

Proposed variation of national analogue radio licence

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### **CONSULTATION:**

Publication date: 23 October 2019

Closing date for responses: 20 November 2019

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# 1. Overview

## What we are proposing

- 1.1 talkSPORT have requested to reduce the transmission coverage of its AM national commercial radio licence by 2.4%. We are giving stakeholders an opportunity to make comments on our provisional decision to accept these proposals. This is because, if the changes are permitted, some listeners will lose their ability to receive talkSPORT on the AM band, and because other commercial radio stations might be interested in the approach that we are minded to take in this case. We will carefully consider any comments from stakeholders before making a final decision.

## Introduction

- 1.2 talkSPORT Limited holds a national commercial radio licence to broadcast its sport-oriented service across the UK on the AM (medium wave) band. Under its broadcasting licence, talkSPORT must secure that its service serves so much of the UK “as is for the time being reasonably practicable”.
- 1.3 Through closing seven transmitter sites, talkSPORT has proposed a reduction in the coverage of its AM network from 95.4% of the UK adult population (aged 15+) to 93%<sup>1</sup>. talkSPORT would like to implement these changes as soon as possible.
- 1.4 talkSPORT has made these proposals in the context of declining listening to its service on AM, as well as increased listening on digital platforms. It also pointed out that last year Ofcom agreed to a request from Absolute Radio to switch off twelve AM transmitters (five of which are in the same regions as those requested by talkSPORT).

## Ofcom’s Provisional assessment

- 1.5 Having considered talkSPORT’s proposals, our provisional view is that the impact will be marginal given the decline in analogue listening and the number of listeners likely to be affected by the proposed changes.
- 1.6 Therefore, we are minded to accept talkSPORT’s proposals and we consider that our provisional decision would comply with our statutory duties. In summary, this is because:
- a) in these specific circumstances, we consider that broadcasting the licensed service to 93% of adult population of the UK would still ensure optimal use of spectrum; and
  - b) the availability of talkSPORT on alternative platforms is likely to maintain a plurality of radio providers and radio services in the geographical areas affected by the proposals.

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<sup>1</sup> Based on Ofcom’s estimate of adult population served within talkSPORT’s measured coverage area. talkSPORT estimates coverage of UK households as 97% reducing to 95%.

- 1.7 If we decide to accept talkSPORT's proposals, we would vary its broadcasting licence and its associated Wireless Telegraphy Act licence by removing reference to the transmitter sites that talkSPORT is proposing to close.

### Next steps

- 1.8 We are currently aiming to make a final decision and publish a statement in December 2019. We will carefully consider any comments that stakeholders might wish to make before making any final decision. We are giving stakeholders until **20 November 2019** to provide comments.

## 2. Background

- 2.1 talkSPORT Limited ('talkSPORT', or the 'Licensee') holds one of the three national analogue commercial radio licences<sup>2</sup> in the UK issued under the Broadcasting Act 1990 (the "**Broadcasting Licence**"). Under the terms of its Broadcasting Licence, it must provide a radio service which is "A 24-hour speech service featuring primarily sports-related programming. Regular news bulletins will be included".
- 2.2 The Broadcasting Licence was initially awarded by an auction process in July 1994, and has subsequently been renewed on three occasions. The latest renewal process was completed in December 2017, when we decided to renew the Broadcasting Licence for a further five-year period, until December 2022.<sup>3</sup>
- 2.3 Since its launch in 1994, talkSPORT has incrementally increased the coverage of its national analogue AM radio service to, currently, 95% of the UK adult population through voluntarily adding further transmitter sites.
- 2.4 On 8 May 2019, Ofcom received a formal submission from talkSPORT proposing to switch off seven AM transmitter sites, this would reduce coverage to 93%. These changes are:
  - a) **closing seven transmitter sites.** These transmitters are located at Rosemarkie (Inverness), Redruth (Cornwall), Redmoss (Aberdeen), Londonderry (Northern Ireland), Ocombe (Devon), Plummers Barracks (Plymouth) and Pearce's Hall (Devon).
- 2.5 In addition to this national AM licence, talkSPORT also broadcasts nationally on the Digital One multiplex. The service is also available via television on the Freeview, Sky and Virgin Media platforms, in addition to the internet.
- 2.6 A copy of the Broadcasting Licence is published as a separate document (**Annex A5**).
- 2.7 A non-confidential version of talkSPORT's submission, setting out its proposals and the reasons for them, is published as a separate document (**Annex A6**).

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<sup>2</sup> The other two licences are held by Absolute Radio and Classic FM.

<sup>3</sup> <https://www.ofcom.org.uk/consultations-and-statements/category-3/renewal-independent-national-radio-licences>

## 3. Legal Framework

### Structure of this section

- 3.1 In this section, we set out the legal framework for assessing talkSPORT’s proposals as follows:
- a) we set out our statutory duties that are of particular importance to assessing whether we should allow talkSPORT to implement the proposed changes;
  - b) we summarise the relevant licence conditions;
  - c) we explain how we are minded to apply our statutory duties to assessing talkSPORT’s proposals; and
  - d) finally, we explain how we would implement the changes proposed by talkSPORT and our approach to impact assessment.
- 3.2 For brevity, we refer to: the Communications Act as the “**2003 Act**”; the Broadcasting Act 1990 as the “**1990 Act**”; and the Wireless Telegraphy Act 2006 as the “**WT Act**”.

### Ofcom’s Statutory duties

- 3.3 The statutory duties that appear particularly import to assessing talkSPORT’s proposals derive from the 2003 Act and the 1990 Act.

#### Our duties under the Communications Act 2002

- 3.4 Ofcom's principal statutory duty as set out in section 3 of the 2003 Act is to further the interests of citizens in relation to communications matters; and to further the interests of consumers in relevant markets, where appropriate by promoting competition. Ofcom is also required to secure (amongst other things):
- a) the optimal use for wireless telegraphy of the electromagnetic spectrum;<sup>4</sup>
  - b) the availability throughout the UK of a wide range of television and radio services which (taken as a whole) are both of high quality and calculated to appeal to a variety of tastes and interests;<sup>5</sup> and
  - c) the maintenance of a sufficient plurality of providers of different television and radio services.<sup>6</sup>
- 3.5 In performing our duties, we must have regard to those factors that appear to us to be relevant in the circumstances. In this case, we consider that “the different interests of persons in the different parts of the United Kingdom, of the different ethnic communities

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<sup>4</sup> Section 3(2)(a) of the 2003 Act.

<sup>5</sup> Section 3(2)(c) of the 2003 Act.

<sup>6</sup> Section 3(2)(d) of the 2003 Act.

within the United Kingdom and of persons living in rural and in urban areas” is of particular importance (section 3(4)(l) of the 2003 Act).

- 3.6 In performing our duties, we are also required under section 3(3) of the 2003 Act to have regard in all cases to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed.

### **Our duties under the Broadcasting Act 1990**

- 3.7 In addition, under section 85 of the 1990 Act, Ofcom is required to secure the provision of a diversity of national analogue services, of which one must consist mainly of speech and another must consist wholly or mainly of non-pop music.

## **talkSPORT’s broadcasting licence**

### **The reasonably practicable threshold for ensuring coverage**

- 3.8 Condition 2(1) of the Broadcasting Licence requires talkSPORT to secure that its analogue radio service serves so much of the UK “as is for the time being reasonably practicable”.<sup>7</sup> This licence condition mirrors section 106(2) of the 1990 Act, which provides that:

“A national or local licence shall include conditions requiring the licence holder to secure that the licensed service serves so much of the area or locality for which it is licensed to be provided as is for the time being reasonably practicable”.

- 3.9 The Broadcasting Licence requires talkSPORT to reach such coverage by broadcasting the licensed service from 28 transmitter sites. The location and technical characteristics of these transmitters are specified in the Broadcasting Licence (Parts II and III of the Annex).

### **Failure to comply with the coverage requirement**

- 3.10 Failure to secure that the licensed radio service serves so much of the UK “as is for the time being reasonably practicable” may constitute a breach of Condition 2(1) of the Broadcasting Licence.<sup>8</sup>
- 3.11 The range of penalties that can be imposed on licensees for breach of a licence condition includes financial penalties, shortening the licence, suspending the licence or revocation. These penalties are set out in the statutory regime, together with procedural

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<sup>7</sup> This licence condition reads as follows: “The Licensee shall provide the Licensed Service specified in the Annex for the licence period and shall secure that the Licensed Service serves so much of the licensed area as is for the time being reasonably practicable.”

<sup>8</sup> We would investigate any such breach according to our Enforcement Guidelines. See Ofcom’s “General procedures for investigating breaches of broadcast licences”, 3 April 2017; [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0019/31942/general-procedures.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0019/31942/general-procedures.pdf).

requirements,<sup>9</sup> and mirrored in the Conditions set out in Part IV ('Conditions relating to enforcement of licences') of the Broadcasting Licence.

### Licence Variations

- 3.12 Ofcom has a general power to make changes to broadcasting licences by means of serving a notice of variation on the licensee.<sup>10</sup> This power is reflected in Condition 23 of the Broadcasting Licence. We must give the licensee a reasonable opportunity to make representations before making the variation (Condition 23.2 of the Broadcasting Licence).<sup>11</sup>

## talkSPORT's wireless telegraphy licence

- 3.13 talkSPORT holds also a licence issued under the Wireless Telegraphy Act 2006 (the "**WT Licence**") which authorises it to establish, install and use radio transmitting stations and/or radio apparatus (i.e. transmitters) in the same locations authorised under its Broadcasting Licence (i.e. 28 sites in total) for the transmission of the sound broadcasting service described in the Broadcasting Licence.
- 3.14 Condition 3 of the WT Licence allows Ofcom to vary this licence in specific circumstances, which include where the variation is "at the request of, or with the consent of, the Licensee"<sup>12</sup>, and requires us to notify the licensee in writing or by a general notice in accordance with Schedule 1 paragraph 6 of the WT Act. Ofcom has a broad discretion under paragraph 6 of Schedule 1 of the WT Act to agree to vary licences, but legal rules operate to limit that discretion. In particular, according to paragraph 6A of Schedule 1 of the WT Act, any variation of a wireless telegraphy licence must be objectively justifiable.

## Application of our relevant duties to assessing talkSPORT's proposals

### Ofcom's task

- 3.15 Given the requirement set out in Condition 2(1) of the Broadcasting Licence (see paragraph 3.8 above), the main questions that we need to address are:
- b) whether it remains reasonably practicable for talkSPORT to serve **95.4%** of the UK adult population with its analogue radio service; and

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<sup>9</sup> Sections 109-111 of the 1990 Act.

<sup>10</sup> Section 86(5) of the 1990 Act. The 1990 Act provides that if Ofcom thinks that it would be reasonably practicable for a national service to be provided to an additional area falling outside the minimum area set in the award process, Ofcom can require the licensee to provide the service for that additional area (section 106(3)). However, the 1990 Act does not contain any specific provision for requests to reduce the minimum area.

<sup>11</sup> This licence condition mirrors section 86(5)(b) of the 1990 Act. Condition 24 of the Broadcasting Licence specifies in which way we may give any notice of variation, including in electronic form (subject to the requirements set out in Sections 395 and 396 of the 2003 Act).

<sup>12</sup> This licence condition mirrors Schedule 1, paragraph 8(2)(a) of the WT Act 2006.



- c) if that level of coverage is no longer reasonably practicable, whether the combined effect of the measures that talkSPORT has proposed to take (i.e. a reduced coverage of **93%** of the UK adult population), would meet the “reasonably practicable” threshold set out in the licence conditions.
- 3.16 The “reasonably practicable” threshold entails a balancing exercise to ensure proportionality. To simplify, we put on one side any costs and other disadvantages involved in providing the service at the current level of coverage and, on the other side, the nature and extent of the risks involved if the current coverage of the service was reduced. In considering the various factors involved in this balancing exercise, we need to take account of our statutory duties.

### **Ofcom’s provisional decision in light of our statutory duties**

- 3.17 For the reasons set out in Section 4 of this document, we are minded to accept talkSPORT’s proposals and we provisionally consider that such a decision would comply with our statutory duties (paragraphs 4.16-4.19). In summary, this is because:
- a) in these specific circumstances, we consider that broadcasting the licensed service to 93% of the UK adult population would still ensure optimal use of spectrum; and
  - b) the availability of talkSPORT Radio on alternative platforms (including digital radio, television and internet) is likely to be sufficient to maintain a plurality of radio providers and radio services in the geographical areas affected by the proposals.
- 3.18 We also note that removing reference to the transmitter sites that talkSPORT has proposed to close from its WT Licence (with effect from the date when talkSPORT intends to close them) would be objectively justifiable as it would align this licence with the Broadcasting Licence.

### **Implementation**

- 3.19 If we decide that it is appropriate for talkSPORT to take the proposed measures, closing certain transmitter sites, we need to vary its Broadcasting Licence and WT Act Licence by removing reference to the transmitter sites that talkSPORT has proposed to close, with effect from the date when talkSPORT intends to close them. To do so, we need to notify talkSPORT and give it a reasonable opportunity to make representations (see paragraph 3.12 above).
- 3.20 Although there is no statutory requirement to consult more widely, we are allowing stakeholders an opportunity to provide comments in this specific case, since we note that:
- a) According to Ofcom’s estimates around 2.4% of the adult UK population (1,249,272 adults) would no longer be able to receive talkSPORT on AM; and
  - b) holders of other analogue commercial radio licences, and particularly those holding AM licences, might be interested in the approach that we are minded take in this case.

- 3.21 We are giving stakeholders three weeks to provide any comments they might wish to make. In our view, given the narrow scope of this consultation, this period gives interested parties an appropriate period in which to consider and respond to this consultation.
- 3.22 We will carefully consider any comments from stakeholders before making any final decision.

### **Impact assessment and equality impact assessment**

- 3.23 This document, taken as a whole, comprises an impact assessment as defined in Section 7 of the 2003 Act. We have not identified any detrimental impact on any equality groups (i.e. age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation). Nor have we seen the need to carry out a separate equality impact assessment in relation to the additional equality groups in Northern Ireland: religious belief, political opinion and dependents. This is because we anticipate that the changes proposed by talkSPORT will not have a differential impact in Northern Ireland compared to consumers in general.

## 4. Our provisional assessment

### Summary of talkSPORT's request and rationale

- 4.1 talkSPORT has proposed to close the following seven transmitters:
- Rosemarkie (Inverness);
  - Redruth (Cornwall);
  - Redmoss (Aberdeen);
  - Londonderry;
  - Ocombe (Devon);
  - Plummers Barracks (Plymouth);
  - Pearce's Hill (Devon).
- 4.2 talkSPORT has calculated that, these changes would lead to the UK household coverage of its licensed service being reduced from 97% to 95% (see map at Annex A6 to talkSPORT's submission for the affected areas).
- 4.3 Ofcom has calculated that these changes would lead to the adult (aged 15+) UK population coverage of its licensed service being reduced from 95.4% to 93%, and that 1.2 million adults in the UK would lose access to the AM service.
- 4.4 talkSPORT maintains that switching off the seven requested transmitters will have a negligible impact on its AM reach and, and coverage in some of the areas will continue to be provided via DAB.
- 4.5 talkSPORT notes that there has been a decline in analogue listening at a rate faster than it had predicted and the listening at the sites talkSPORT wants to close, based on RAJAR data, is no longer at appreciable levels due to the evolution of audience behaviour.
- 4.6 talkSPORT has calculated, using RAJAR data, a decline in AM listening of 18% since 2013 and listening via its digital platforms has increased 18% since 2013.
- 4.7 talkSPORT notes its parent company, the Wireless Group's, investment into their own digital services and the expansion recently with five new digital services (talkSPORT 2, Virgin Radio, Virgin Radio Anthems, Virgin Radio Chilled and talkRADIO).
- 4.8 In terms of terrestrial broadcast radio coverage, talkSPORT notes that, while the move to a 21 site network will reduce coverage, there will be overlapping coverage via the DAB platform reducing the loss of coverage to 0.5%. talkSPORT suggests that the availability of the service via DTV and online distribution means the loss of coverage is likely to be less than this.
- 4.9 To put its request in context, talkSPORT notes Absolute Radio's closure programme of local radio AM transmitters, highlighting that Absolute Radio decommissioned five equivalent AM transmitters in the same regions in 2018.

## Ofcom's preliminary view on the request

### Impact on listeners

- 4.10 Based on the information provided to Ofcom by talkSPORT, the proposed changes would have the following effects:
- a) the proposed changes would result in about 650,000 of UK households losing their ability to receive talkSPORT's AM signal;
  - b) of these, about 554,000 UK households would instead be able to listen to talkSPORT on DAB digital radio;
  - c) therefore, around 96,000 UK households would lose AM coverage and would also not have the option of listening talkSPORT on DAB digital radio. However, they are likely to be able to listen to talkSPORT via the internet and other digital platforms.
- 4.11 According to Ofcom's estimates around 2.4% of the adult UK population (1,249,272 adults) would no longer be able to receive talkSPORT on AM.

### Compliance with the licence condition

- 4.12 As already noted in Section 3 (paragraph 3.8), Condition 2(1) of the Broadcasting Licence requires that the licensed service serves so much of the UK "as is for the time being reasonably practicable."
- 4.13 In our view, beyond considerations of what is technically and logistically possible in terms of transmission provision (for example, the availability of suitable transmission sites), the "reasonably practicable" threshold is a balancing exercise to ensure proportionality with disadvantages to the licensee on one hand, and the benefits to potential listeners on the other.
- 4.14 According to Ofcom's estimates, around 2.4% of the adult UK population (1,249,272 adults) would no longer be able to receive talkSPORT on AM.
- 4.15 We also note the long-term decline in the popularity of listening to the AM band, and that many of those who would lose the ability to access the talkSPORT AM signal would be able to continue to receive talkSPORT via national DAB digital radio. In the relatively few areas where reception of the national Digital One multiplex is unavailable, there are further options to listen online, or via television (the station is available on the Freeview, Sky and Virgin Media platforms).

### Assessment against Ofcom's statutory duties

- 4.16 As noted in Section 3, in considering whether talkSPORT would remain compliant with its licence conditions, we also need to take account of Ofcom's wider statutory duties.
- 4.17 Ofcom's principal statutory duty as set out in section 3 of the 2003 Act is to further the interests of citizens in relation to communications matters; and to further the interests of

consumers in relevant markets, where appropriate by promoting competition. Ofcom is also required to secure (amongst other things):

- a) the optimal use for wireless telegraphy of the electromagnetic spectrum;
- b) the availability throughout the UK of a wide range of television and radio services which (taken as a whole) are both of high quality and calculated to appeal to a variety of tastes and interests; and
- c) the maintenance of a sufficient plurality of providers of different television and radio services.

4.18 In considering the need to secure **optimal use of spectrum**, while we recognise that the implementation of talkSPORT's proposals would mean a 2.4% reduction in coverage of its AM network, talkSPORT would continue to use the relevant spectrum to broadcast to a high proportion (93%) of the UK adult population. Therefore, we consider that, in these circumstances, talkSPORT's proposal to continue to broadcast its licensed service to 93% of the UK adult population would secure optimal use of spectrum.

4.19 Regarding the need to ensure **plurality of services and providers**, we note that Ofcom licenses a wide variety of television and radio services across the UK, on a range of different platforms, with a variety of different programme formats. As previously noted, the vast majority of talkSPORT's listeners affected by its proposals would be able to re-tune to the service on national DAB radio. Finally, we also note that the availability of talkSPORT on alternative broadcast platforms (i.e. on Freeview, Sky and Virgin Media platforms) and internet would further contribute to mitigating any potential adverse impact on consumers.

### Licence Variations

4.20 Therefore, subject to consideration of stakeholders' responses, we are minded to accept talkSPORT's proposals and remove reference to the transmitter sites that talkSPORT has proposed to close from its Broadcasting Licence and WT Act Licence, with effect from the date when talkSPORT intends to close them.

The overview section in this document is a simplified high-level summary only. The proposals we are consulting on and our reasoning are set out in the full document.

# A1. Responding to this consultation

## How to respond

- A1.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 20 November 2019.
- A1.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-3/talksport-proposals-to-reduce-am-coverage>. You can return this by email or post to the address provided in the response form.
- A1.3 If your response is a large file, or has supporting charts, tables or other data, please email it to [talksport@ofcom.org.uk](mailto:talksport@ofcom.org.uk), as an attachment in Microsoft Word format, together with the [cover sheet](#). This email address is for this consultation only, and will not be valid after 20 November 2019.
- A1.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- talkSPORT consultation
- Broadcast Licensing Team (second floor)  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA
- A1.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- Send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files. Or
  - Upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A1.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A1.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt if your response is submitted via the online web form, but not otherwise.
- A1.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A1.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The question is listed at Annex 4. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

- A1.10 If you want to discuss the issues and questions raised in this consultation, please contact Laura Hogbin on 020 7783 4118, or by email to [talksport@ofcom.org.uk](mailto:talksport@ofcom.org.uk).

## Confidentiality

- A1.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish all responses on [the Ofcom website](#) as soon as we receive them.
- A1.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A1.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A1.14 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our [Terms of Use](#).

## Next steps

- A1.15 Following this consultation period, Ofcom plans to publish a statement in December 2019.
- A1.16 If you wish, you can [register to receive mail updates](#) alerting you to new Ofcom publications.

## Ofcom's consultation processes

- A1.17 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 2.
- A1.18 If you have any comments or suggestions on how we manage our consultations, please email us at [consult@ofcom.org.uk](mailto:consult@ofcom.org.uk). We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.19 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA  
Email: [corporationsecretary@ofcom.org.uk](mailto:corporationsecretary@ofcom.org.uk)



## A2. Ofcom's consultation principles

### **Ofcom has seven principles that it follows for every public written consultation:**

#### **Before the consultation**

- A2.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

#### **During the consultation**

- A2.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A2.3 We will make the consultation document as short and simple as possible, with a summary of no more than two pages. We will try to make it as easy as possible for people to give us a written response. If the consultation is complicated, we may provide a short Plain English / Cymraeg Clir guide, to help smaller organisations or individuals who would not otherwise be able to spare the time to share their views.
- A2.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A2.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A2.6 If we are not able to follow any of these seven principles, we will explain why.

#### **After the consultation**

- A2.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

## A3. Consultation coversheet

### BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

### CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing ☐

Name/contact details/job title ☐

Whole response ☐

Organisation ☐

Part of the response ☐

If there is no separate annex, which parts? \_\_\_\_\_

\_\_\_\_\_  
If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

### DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

## A4. Consultation question

Question 1: Do you agree that Ofcom should give its consent to the reductions in AM (medium wave) transmitter coverage proposed by talkSPORT? If you do not agree, please give reasons.

## A5. talkSPORT's broadcasting licence

This Annex is published as a separate document.

## A6. talkSPORT's submission

This Annex is published as a separate document.