

## Your response

Question 1: Respondents are invited to comment on whether they agree with Ofcom's preliminary view and to frame their views and responses with reference to, or in the context of, the statutory criteria in section 106(1A) of the Broadcast Act 1990 (as amended).

The findings detailed in the request to change the character of service for XS Manchester to that of Capital Xtra are concerning.

The comparison based on comparing XS Manchester to Radio X is too simplistic. The stations cater to two different age demographics.

In addition, the Rajar Q2 figures sourced in Ofcom's report at the time of public publication were out of date. Q3s Rajar figures show a clear increase in XS Manchester's reach up to 80 and listening hours at 540, these should have been referenced and published as the comparison basis for this document.

Radio X and Capital Xtra provide services that cater to their respective target audiences well. My disagreement over the change to the character of service which is proposed for XS Manchester is down to the proposal and not levelled against any of these brands/services.

Capital Xtra is currently available in Manchester via a number of platforms and methods for example, DAB, Digital TV, online and through smart speakers. Capital Xtra's audience is a younger demographic who are more likely to listen through those platforms mentioned above.

46% of music played on Radio X and XS Manchester may overlap, however 54% doesn't and with other crossovers by existing stations, this doesn't take into account new music.

XS Manchester has a history of supporting new bands and artists who may have struggled to receive airplay. XS in addition to airing "New Rock" weekly as a programme have integrated new music into the station's playlist. Blossoms received very early air play on XS, as did Cabbage, The Sherlocks and a whole host of others.

Local music groups and venues have been concerned enough to start petitions against the

proposed changes to XS Manchester.

Events have been a strong point for XS, its sponsors and listeners, with the recent ticketed breakfast show live selling out in less than 1 minute. Demonstrating there is a clear bond between the XS and its target listeners.

A concerning development in the Ofcom report is how commercial and community stations have been listed as providing similar music tastes to XS Manchester and Radio X.

Community stations function on smaller budgets than commercial stations and with very different characters of service and requirements.

Community stations can't be expected to fill a gap created in programming as their aims and in some cases limitations can't provide the same level of professional service as a commercial station can operate at.

In many cases community stations transmitters are of lower power specs to that of commercial stations, creating drop outs or not covering the same TSA in whole.

Community Radio can provide excellent content; however, the comparison in this way doesn't seem correct.

To close, XS Manchester's Q3 Rajar results show encouraging improvement, combined with a breakfast show that hasn't been airing for a year. The request to change has come too soon, without the benefits that may arrive when Q4s figures are published.

XS being changed to Capital Xtra will create a gap in Manchester for guitar based music, in a city that has created more rockstars per mile than anywhere else in the country. It's ingrained into Manchester's DNA and XS as a service is a strong fit.

I haven't commented on changes to services before, however in this case I believe it is necessary to add my opinion within a professional context.

I look forward to hearing the outcome of the

consultation.

David Rothwell
Former XS Manchester Producer