

LICENSED AREA MERGER PROPOSAL CONSULTATION RESPONSE

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About us:

The Triple Broadcast Co are a Local Radio and TV group. We currently operate the successful 'Fire Radio 107.6FM ' commercial station in Dorset; Own the DAB Multiplex for Somerset and are just launching the UK's only commercially funded local TV service on DTT in Manchester 'Fire Hit TV'

Our View:

In assessing the Local TV business case and the public objectives of local TV we have concluded that the combination of Gloucester, Hereford and Malvern offers sustainability - both economically and creatively - in what will still be a small and highly localised broadcast service after merger

The small Malvern DSPA does not provide a robust enough coverage over Worcestershire to enable an economically sustainable service for a Stand-alone service. Combined with the a service for Gloucester (including Hereford) the public value of local TV for the whole area is enhanced by the prospect of a licensee being able to increase investment in Journalists and content production.

The output of the proposed merged Malvern/Hereford/Gloucester is likely to creatively and editorially improved, by covering a single area in a way that more closely matches the audiences real life relationship with the communities and geography served.

The ability to maintain the licensed service beyond the first three years is greatly enhanced by merging these areas, the economic arguments, revenue per thousand and cost base has been explored extensively by Ofcom and the DCMS and our argument is entirely consistent with those assessments.

The hyper local 'community driven' model has achieved higher appreciation scores during research in areas far from population centres or where the economy is more self contained than in these consultation areas. A more professionally staffed model of operation is required to ensure a successful and relevant Local TV service is available and of interest to all.

Our experience in local radio show us that where a local town has a high degree of daily retail and employment migration within 25 miles, content that is primarily focused within such towns is viewed as of lower value than broader content that matches the daily commute of local people.

It is notable that Malvern & Gloucester will, after a merger, still be one of the smaller Local TV services; and will still be smaller than the Ofcom local radio approved area (for sharing local broadcast material)

Sustainable Content of Public Value:

- Objective for local TV to be of public value and enhance local debate and democracy.
- Local news is a priority on Local TV, and Ofcom have stated of a preference for journalism led news coverage for 1 hour per day.
- The news service for the small Malvern DSPA is likely to be limited in both its range of content and resources available.
- A combined Malvern service with the newly merged Gloucester/Hereford service would allow for more journalists to work on the service, and a more compelling editorial narrative.
- **Professional journalist led content has proven public value;** Community led content has no track record on UK TV for delivering the robust independent journalism required to achieve the policy objective for local TV.
- Clear public interest case for relevant Local TV to be available to 'real world' communities with strong economic, social and geographic connection and not to be led predominantly by technical considerations. Malvern is served by a transmitter different resource to Gloucester but a stand-alone service is economically questionable and faces severe challenges to long term sustainability.

Relationship and Relevance:

- Near continuous coverage area likely with Gloucester licence
- Significant shared economy in retail and employment
- Significant shared social, sporting and community links
- Shared transport and infrastructure routes both road and rail
- Within the Ofcom approved local radio area South West Midlands
- Shared DAB digital radio service to launch in the areas