

Title:

Mr

Forename:

Matthew

Surname:

Garrod

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you think that allowing Now Digital to extend the coverage area of its Exeter & Torbay local radio multiplex licence to include North Devon would unacceptably narrow the range of DAB programme services available in the Exeter and Torbay area? Please explain the reasons for your view.:

No, it is quite clearly stated in the application that Exeter / Torbay services will not change and therefore the range of services in that area will not be narrowed. However, this

consultation is supposed to be about North Devon. This application, if approved, would eliminate the possibility of North Devon having a local radio station thus narrowing the range of radio services as a whole.

Question 2: Do you think that allowing Now Digital to extend the coverage area of its Exeter & Torbay local radio multiplex licence to include North Devon would be calculated to maintain or promote the development of digital sound broadcasting in the UK otherwise than by satellite? Please explain the reasons for your view.:

No. The application would initially only see 53% of North Devon covered by the service. Although the application states that, subject to certain conditions being met, this coverage may rise in 2013, it would still only cover a little over 70% of the population. This additional coverage is far from guaranteed and therefore cannot be relied on in any informed debate. To provide a service to 53% of an area the size of North Devon is a token effort at best. Instead of promoting DAB as a viable platform, it will alienate people from the service, as they will not be able to rely on it as they move around the area. I do not believe that this proposal is calculated to maintain or promote DAB, rather I believe that it is calculated to ensure that the current FM license holder does not need to reapply for the license.

Question 3: Do you think that Now Digital's proposals for providing coverage of North Devon are satisfactory? Please explain the reasons for your view.:

No. If and when local DAB is introduced in to North Devon, I believe it should be done properly, wholeheartedly and because it is right for the area. The current proposal is extremely limited in terms of coverage and would appear to be what NOW Digital considers to be the least it can get away with to ensure that the North Devon FM license is retained by Global.

Question 4: Do you consider that Now Digital has the ability to maintain its local radio multiplex service if its request is granted? Please explain the reasons for your view.:

Yes, I believe that NOW Digital will maintain the service at the lowest possible levels, once again subjecting North Devon to second-rate services.

Question 5: (For programme service providers on the Exeter & Torbay local radio multiplex only) Do you consider that there are sufficient safeguards in place to protect your rights and interests in the event that Now Digital is permitted to extend coverage to include North Devon?:

Question 6: Do you consider that there any other grounds on which Ofcom should approve, or not approve, the request from Now Digital? Please explain the reasons for your view.:

The proposal from Now Digital does not go far enough or provide enough benefit to residents and businesses in North Devon to counter the effect of the linked automatic renewal of the

current FM license.

North Devon is a very different area to South Devon and there is very little affinity between them. To people living and working in North Devon, Exeter, Plymouth and Torbay are remote places that have no bearing on their every day lives. This lack of affinity and uniqueness of the area was always recognised by the radio industry, from the day Lantern FM started broadcasting, during the time it was part of the Orchard Media Group and continuing through to when it was run by GCap. Only since Global has been in charge of the license has our local station been molded out of recognition and into a bland one-size fits all format.

The timing and content of this application make it very clear that this is purely an anti-competitive move by Global and its related companies. The sole purpose of this application is to stifle competition in the sector and prevent the re-advertisement of the North Devon FM license. Ofcom has an obligation to promote competition and so the application should be rejected on those grounds alone. If Now Digital is truly committed to providing a local multiplex in North Devon, then I would be happy to see the application resubmitted after a fair competition decides who should hold the FM license for the next period.

North Devon has already suffered because of Ofcom's decision to allow the North Devon license holder to programme share all of its output with neighbouring areas that have no affinity with it. To allow this application to proceed, at this time, would show a true lack of appreciation and understanding of the needs and wants of the community that will be affected by the outcome.