

Dear Martin,

I'm contacting you regarding the Format Request Change submitted by Nation Radio, owned by Town & Country Broadcasting Ltd. My response is non-confidential.

For the purposes of outlining my interests regarding the format request change submitted by Town & Country Broadcasting Ltd., I'm responding purely as a resident in the coverage area and as someone in the target demographic of the proposed format change. Whilst I currently work on a voluntary basis for the Student Radio Association Ltd. in the position of Charities Officer, please note that this response is based only on my opinion and is not necessarily the opinion of the Student Radio Association Ltd., its members or affiliates.

Having read the proposed format change from Town and Country Broadcasting Ltd., I'm concerned by certain aspects of the proposals and the potential impact on the radio market in South Wales. Whilst I'm not directly opposed to the format change in principle, I'd appreciate OFCOM querying the following with the licensee.

The proposed format change adds the word "predominantly" with regards to the intended amount of modern rock music output of the station, whilst dropping the commitment of playing "classic rock genres." Whilst I appreciate that OFCOM has made changes to the format guidance in recent years to simplify the process of licensing stations, specifically regarding music output of licensed stations, I believe that in this case the lack of a specific percentage in relation to the proposed format change for Nation Radio playing i.e. changing the music output to be "predominantly modern rock" could impact on other services operating in the area.

Of particular concern is the lack of definition with the addition of "other genres of appeal to the station's target audience of 15-34 year olds" as part of the proposed format change. Page 18 of the format document, as has been made available by OFCOM, identifies Kiss 101 as a commercial radio station operating in South Wales. It is of great concern to me that Town and Country Broadcasting Ltd. appear to be very dismissive of Kiss 101 and while the licensee has clearly considered Kiss 101 in the format change document, I'm surprised that the format of Kiss 101, as defined by OFCOM, has not been compared to the proposed format change of Nation Radio in pages 13 and 14 of the full consultation document. The format of Kiss 101 according to the OFCOM station format is defined as:

A RHYTHMIC-BASED MUSIC-LED SERVICE FOR PRIMARILY UNDER 30s IN THE SEVERN ESTUARY AREA, SUPPLEMENTED WITH NEWS, INFORMATION AND ENTERTAINMENT. IDENTIFIABLE SPECIALIST MUSIC FEATURES FOR AT LEAST 36 HOURS A WEEK.

Not only is Kiss 101 actively targeted at the under 30s, it broadcasts to a significant geographic footprint also covered by the transmitters used by Nation Radio, predominantly in the Newport and Cardiff areas (at least 50% of Nation Radio's MCA population live in the greater Newport and Cardiff areas). Whilst the RAJAR figures quoted by the licensee indicate that Kiss 101 has a 2.2% share, I remain concerned that the licensee has, by not defining its additional music output, given itself the opportunity to directly compete with Kiss 101.

I also consider it necessary to highlight the opposition to the original nature of music output offered by Nation Radio when Town & Country Broadcasting Ltd. purchased the licence from GCap (now Global Radio). There are over 1,100 members of a [“Save XFM Wales” Facebook Group](#) – whilst the group isn’t particularly relevant regarding the headline and the majority of content dates from June 2008, the comments regarding the music output of the Nation Radio test transmissions are, I believe, of vital relevance regarding the format change (two artists that are quoted on multiple comments are KT Tunstall and James Morrison, which I consider to fall outside of the definition of “modern rock.”) I am very concerned that Town & Country Broadcasting Ltd. are, by leaving the proposed format in very general terms regarding the “other genres of appeal,” attempting to use the format request change to significantly change the character of the service and return the music output as offered during the test transmissions. I’m concerned that this would likely disappoint existing and therefore provide a more direct competition to existing radio services in the South Wales area, even though it is stated in the format change that they intend on offering a genuine alternative.

I therefore believe it necessary for OFCOM to query the definition of “predominantly modern rock” in the format request change as submitted by Town and Country Ltd., if necessary by requesting percentages of modern rock and non-modern rock music. Failure to do so by OFCOM could, I believe, lead to direct competition to existing services, particularly if the definition of “predominantly modern rock music” should be lower than 75% of all music output (predominantly should, in my opinion, be defined as equal or greater than $\frac{3}{4}$ of all music output). I’d also request OFCOM to consider the omission of “classic rock genres” from the format, which I believe will significantly change the character of the service. I’d therefore like OFCOM to only grant the proposed format change if it is convinced that Nation Radio will successfully maintain the character of service currently offered and not revert to a music output of a nature offered during the test transmission of Nation Radio.

Regarding section 1.8 of the OFCOM consultation document (*“Secondly, the Format requirement for weekly sessions involving local artists would change to an obligation to “include coverage” of local artists”*), I appreciate that this is a necessary change to ensure the survival of the licence. Whilst it may have been of interest to the original applicant, GCap Media (now Global Radio), I’ll add that Ashley Tabor (Global Radio CEO) stated at the Student Radio Conference in April 2009 that XFM South Wales was sold due to the station losing money. I can appreciate that weekly sessions are a significant expense that could significantly damage the financial viability of the licence and as such I have no objections to the changes proposed in section 1.8 being granted in full.

I have no further concerns or objections regarding the proposed format change.

Best wishes,

Ian Devlin