

BASIC DETAILS

Consultation title: Nation Radio (South Wales) Format change

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Representing (self or organisation/s): GMG Radio

Address (if not received by email):

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Name Jeff Stephenson on behalf of GMG Radio

Signed (if hard copy)

Nation Radio (South Wales) Format Change Consultation – GMG Radio response to Ofcom

Consultation question

Should Nation Radio be permitted to make its proposed changes to the station, with particular regard to the statutory criteria as set out in the summary? (The Broadcasting Act 1990 Section 106 (1A) (b) and (d) relating to Format changes).

Current Format

AN ALTERNATIVE ROCK STATION FOR SOUTH WALES, PLAYING MODERN AND CLASSIC ROCK GENRES, WITH WEEKLY SESSIONS AND COVERAGE OF LOCAL ARTISTS

Proposed Format

A NEW MUSIC STATION FOR SOUTH WALES, PLAYING PREDOMINANTLY MODERN ROCK, WITH AND OTHER GENRES OF APPEAL TO THE STATION'S TARGET AUDIENCE OF 15-34 YEAR OLDS. OUTPUT WILL ORIGINATE FROM SOUTH WALES AND WILL INCLUDE COVERAGE OF LOCAL ARTISTS.

GMG Radio response summary

In order for Nation Radio to be permitted to make its proposed Format changes we would seek beforehand some clarification to Ofcom on both the intended future music policy and also less ambiguity in the overall wording contained within the new proposed Format. We appreciate that if the current Format is a burden to the future success of the service and therefore compliance to following it has severely restricted past and future development, then some form of change may be appropriate.

We also believe that it is not in the best interests of individual businesses, the commercial radio industry as a whole and ultimately detrimental to building audiences, if a station Format is so restrictive that it clearly prohibits future growth and becomes uneconomic.

Background

South Wales's second regional analogue licence was awarded to the current format because Ofcom RLC were convinced the original XFM application fulfilled the key statutory criteria which included the offering to listeners of a viable alternative to those commercial services already operating in the region and one which would clearly be distinctive in both its complete alternative sound and potential appeal to an underserved target demographic.

The winning application was convincing and well researched and "in particular, the Committee felt that the Format proposed by XFM South Wales Limited, which would offer an alternative rock music service, including each week at least 45 hours of specialist music programming, 'live' sessions, exposure for unsigned artists, local listings for live music and comedy programmes, would be very distinctive in relation to existing provision, and clearly would enhance the choice for listeners in all parts of the area to be covered by this service".

It's appreciated that any choice of award should be justified although in this particular case, perhaps even more so for Ofcom as within the applications submitted originally there were four further formats which appeared to offer a much wider range of rock genre music with slightly broader demographic appeal to that of the eventual winning application. These were:

Original FM - "Adult Alternative Radio – an eclectic mix of adult-orientated music with particular ABC1 appeal, with 24 hour local news."

Dave FM - "Dave FM is a rock music station, playing a broad mix of classic and contemporary rock aimed primarily at 20-44 year old men in South Wales with 24 hours a day local news, information and sport bulletins, focusing particularly on rugby."

Kerrang Radio Wales - "A specialist rock music service mixing modern and classic rock (plus some contemporary tracks selected from genres appreciated by rock fans) with stimulating speech elements for young rock aficionados."

Wicked FM - "A full service modern rock station for people under 40 in the South Wales area with local news and information and indie, alternative and soft rock music album tracks and singles and British guitar based music album tracks and singles from the late 80s and 90s with specialist rock shows during evenings and weekends."

The point to make on this is that the award was made originally because of the significant differences offered by the XFM application in music terms as well as its likely and specific demographic appeal supplemented by strong and robust research. Other applicants as indicated above offered perhaps something similar in overall broader music terms to that now being sought by Nation Radio and we do believe the newer Format if clarified will be a more realistic proposition to ensure broader appeal for a new service. We also note also that none of these applications sought to be over specific on the target demographic of 15 to 34 year olds.

However the case was made that this demographic was the underserved market in south Wales and Radio 1 then as is now – the major player in attracting them. It is recognised however that styles and music tastes of this demographic are eclectic and can't be pigeon-holed, so in order to be successful, a commercial radio format must have very specific ideas on what drives these listeners on to the station and then needs to successfully deliver on those ideas in order to create and build new listeners and with this subsequent further commercial demand.

Reasoning behind our response summary

Nation Radio as the new licensee wishes to change its format on the grounds of meeting the assumed needs of a specific demographic and thus allowing the service to be more able to compete with BBC Radio 1 for such audiences. Although there is no specific evidence submitted which suggests that this would be the outcome should a change be allowed or any analysis or opinions on why Radio 1 really leads in the 15 to 34 demographic, nevertheless so tight a Format as currently required does appear restrictive in terms of flexibility.

The change submission does not attempt to measure the likely impact of the agreed Format change on any of the commercial services included nor indeed on Radio 1 and we would

therefore like some clarification going forward of likely content in music terms as we feel it's currently ambiguous in terms of a clearly defined music policy.

As such GMG Radio would ask that Ofcom considers the following indicators for inclusion within its decision making process.

1. The new proposed Format

Some terminology used within the new Format submission is vague and it is quite difficult to properly determine what impact a change to "other genres of appeal" music can have on either the commercial market or indeed on Radio 1. There is also a question over what within the new Format would constitute the term "predominantly modern rock" and we would seek to have further clarity on this position. Potentially the literal meaning of the terminology used might indicate a desire from Nation Radio that only 50.1% of music output as a maximum would sit within this modern rock music genre and therefore the remainder could feasibly be any form of music which by subjective opinion would sit well as having appeal to the targeted demographic of 15 to 34 year olds.

2. Retaining distinction in the market

As the other regional licensee in the market we feel it is important that both Real Radio and Nation Radio's distinction on the south Wales radio dial is maintained. The current vagueness of the proposed music policy within the new Format perhaps allows so much flexibility in output that it may inadvertently lead to an unhealthy 'creep' in terms of similarity of tracks and artists to other commercial services in the region. We believe change to a broader appeal format as indicated will help Nation Radio gain bigger audiences which we hope at the same time maintains the specific point of difference musically to existing and importantly new listeners who are to be lifted predominantly from Radio 1 rather than existing commercial services.

3. Clarification of Nation Radio music policy

Within the submission as it stands we would wish to know exactly what the actual music policy of the proposed 'new music station for south Wales' will be. There is nothing in the submission which gives any clear indication as to what is meant by 'other genres of appeal to the station's target audience of 15-34 year olds' which unless explained could unfortunately indicate an intention to offer listeners much of the same music as is already available on commercial radio in south Wales. We would therefore seek some comfort that this would not be the case

Overall conclusion

Our considered view is that further clarity on such a revised format and music policy should fulfill either of the criteria set in Ofcom's question but further explanation as indicated should be offered by Nation Radio to Ofcom. We have sympathy with the economic circumstances which the service finds itself facing but for the right reasons we would seek comfort that there would not be a narrowing of the range of programmes available because of the addition within the format of the unexplained "other genres of appeal" statement.

As the new music station for south Wales, we do not wish to see Nation Radio as proposed, basically being re-licensed to move closer in terms of output to existing commercial formats in the market. The music policy clarification has to be transparent because existing commercial stations are playing modern music which already targets 15 to 34 year olds within their wider demographic appeal and do specifically offer this demo already as a lucrative proposition to advertisers on their stations.

Within Nation Radio's assumptions of impact on existing services it is stated that the service *"will also be radically different from the other regional service Real Radio, which plays mainly oldies with a limited amount of new music. Real also has a lot of speech"*. A fairly broad assumption but we welcome this statement on the basis of future intent, however this and referrals to other commercial radio content is not substantiated with monitoring reports or specific evidence to back this up within the submission to Ofcom.

In conclusion we believe if by being allowed this Format change, Nation Radio can maintain its position as a genuine point of difference on the radio dial in terms of listener and advertiser appeal then it will be beneficial to them. Development of its current alternative rock format with further flexibility rather than its erosion should in our view be the way forward to driving audiences and advertisers on to the station.

Therefore in summary GMG Radio has no objection to the stated motives behind the proposed changes and agrees that unwarranted and restrictive Formats are generally unwelcome and have too much influence on the success or failure of a service. For comfort within this overall application by Nation Radio for Format change, we purely seek clarification on music policy and wording as indicated.

Jeff Stephenson
Development Director
On behalf of GMG Radio
22nd December 2009

Ends