

Ashford independent local radio licence applications

Questions and responses: EKR

These are the responses received from East Kent Radio (EKR) to the non-confidential questions asked by Ofcom regarding the group's application for the Ashford licence.

1. How secure are you that your planned TSA of 170,000 is achievable? To what extent would any reduction in the TSA impair the business plan?

Our unique primary transmission site enables the coverage of a significantly larger area than that possible from the central Ashford transmission site favoured by the majority of other applicants. This larger coverage includes additional urban areas of a high population density that are not served by the lower, central Ashford site. As such the full resource of this valuable FM frequency is utilised whilst staying within Ofcom's advertised restrictions. This benefits a larger section of the local community, local commerce and offers a more sustainable and practical business model.

NTL were commissioned to provide transmission surveys, including pixel plots, of the Ashford area and predicted TSA figures, which were calculated from the 1994 Royal Mail postcode data with a 2.39 multiplication factor of the number of delivery points. These figures showed some similarity with those of the other applicants.

The predicted TSA figures we included in our application, however, are based upon 2001 Census data, as supplied from the Office of National Statistics, and which we feel indicates a significantly more realistic, accurate and up to date representation of the area.

NTL has confirmed to us that they recognise the cumulative error from using the 1994 figures, which are now ten years out of date, combined with a similarly out of date multiplication factor that is inappropriate for an area with such a high population growth, could lead to such a discrepancy. They have clarified this further by highlighting that the cumulative error has less of an effect on the higher TSA figures associated with coverage possible for reception at 48dBu/Vm, as indicated in the chart below.

Field Strength	Rural Area (as CCIR 412-5)	Urban Area (as CCIR 412-5)	2001 OCNS census (15 Plus)	NTL 1994 (15 Plus)	Difference
48dBu/Vm	Mono service	–	205,974	202,615	1.63 %
54dBu/Vm	Stereo service	–	175,229	113,965	35.0 %
60dBu/Vm	Stereo service	Mono service	146,703	75,940	48.2 %
66dBu/Vm	Stereo service	Stereo service	129,371	65,065	49.7 %

We suspect that this difference in figures derived from the 1994 postcode data and the 2001 census could also affect the predicted TSA for other applicants. However we confidently and conservatively expect that the additional urban areas included in our coverage predictions will roughly offer an additional 55,000 to bring us to the 175,000 figure included in our application document.

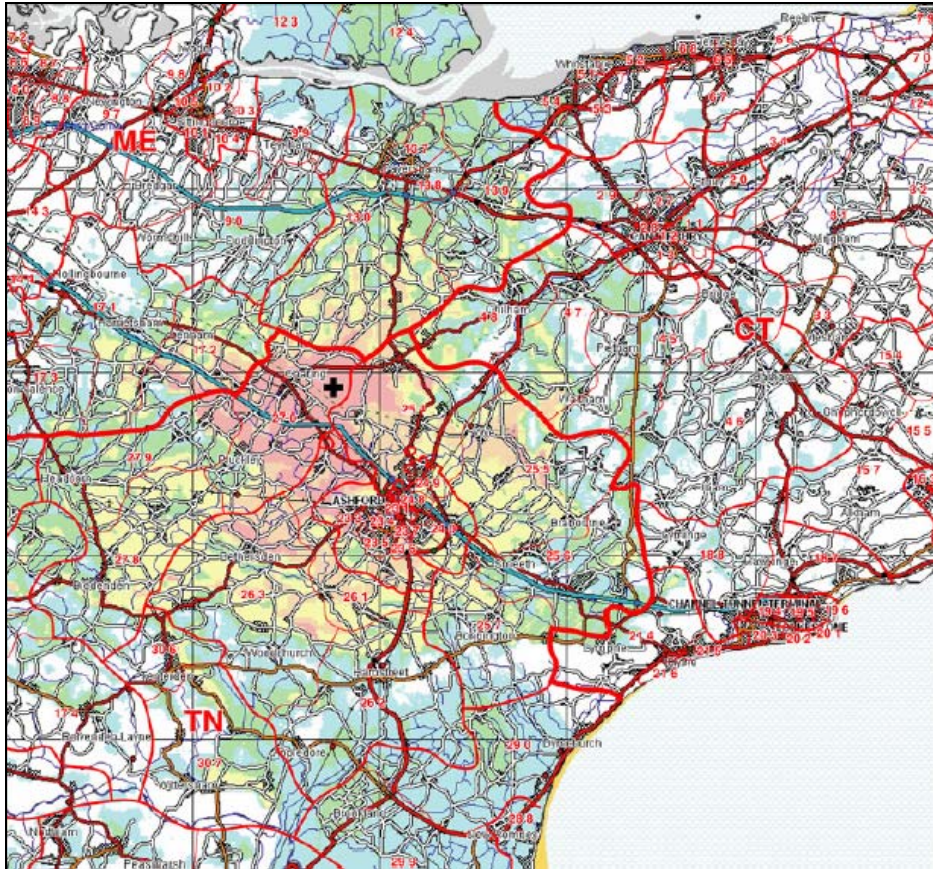
We have attached as support a copy of a specially commissioned map that comprises the pixel plot coverage prediction area from our Challock Gliding Club transmission site with an accurate and up to date map of the post code boundaries overlaid. Alongside is an Excel file with four charts indicating the accurate and up to date population of these postcode areas, based upon the 2001 census data.

We recognise that the data obtained from this graphical representation of the coverage is open to some interpretation and accordingly would expect a maximum deviation of plus or minus 10% from this total. We are confident that the EKR Ashford business plan will allow a deviation of -20% before significant cost savings would need to be implemented.

After further assistance from and consultation with John Shenton at NTL, complementing our earlier discussions with Ofcom's Nigel Green, we are satisfied that the service from our proposed primary transmission site will provide more than adequate coverage at a field strength of 60-65dBu/Vm over the urban area of Ashford town. In the more rural locations of the predicted coverage area, we also are confident of a satisfactory level of service. CCIR recommendation 412-5 advises that a field strength of 54dBu/Vm is satisfactory for stereo reception in rural areas and whilst this does assume the conditions of a roof top receive antenna, under advice, we believe that this defends and indeed supports the data from our pixel plot coverage prediction maps and predicted TSA.

Additionally throughout the past three months, during varying weather conditions, we have undertaken to survey the proposed broadcast coverage area and the 107.6 MHz frequency, for excessive incoming interference. Despite the fact that a standard in-car radio receiver was used for this, rather than a formal radio frequency measuring "tool" and no verified numerical data was produced from it, the outcome indicated a surprisingly clean result. The most noticeable effects of "clutter" (i.e. noticeable incoming interference) occurred in the Maidstone and to a lesser extent the Hastings regions (outside of our predicted transmission area). Our results would suggest that the Isle of Sheppey offers a substantial screening from incoming interference originating from the Thames Estuary. Accordingly we consider that a received field strength of 54dBu/Vm on 107.6 MHz FM will be satisfactory in the predicted rural areas for adequate stereo reception with minor effect from incoming interference.

Postcode / Transmission map



2. Please clarify how you have decided upon a core audience of 25-64 year-olds, with “a slight female bias and marginal C2DE bias” (page 51).

As indicated throughout our document, we state that we are targeting a core audience of 30 - 65 year olds with a slight female bias and marginal C2DE bias. This is illustrated by our population age profile of the Ashford area. The data that was extracted from the ONS (Office of National Statistics) census shows Ashford to having a significantly larger proportion of this age group in the total population make up. This 30 plus profile also is supported by our research findings.

The “25 – 64” old age range on page 51 of our document appears to be a typographical error.

3. How are you defining “album tracks” for the purposes of the Format?

As popular music has evolved over the past ten years, the popularity of the single has waned to the point where in many cases it merely exists as a promotional tool for the album from which it comes. The exception to this is the “teen market” which continues to thrive on new singles. The result is that in 2004 the singles chart no longer reflects the musical preferences of the mass market - a fact recently recognised by the BBC moving pop television programme “Top of The Pops” from BBC1 to BBC2.

Sales of pop singles has now declined to a level where they can no longer be used as a barometer of public opinion. Instead, to find what new music people are buying, listening to and more importantly what they want to listen to on the radio, it is necessary to combine both the singles and album charts. This is especially relevant if the aim is for a slightly more mature market, as in our case.

In our application, we have used the term "album tracks" to indicate that our playlists will not be driven simply by the singles charts. In recent times, the singles charts have been totally dominated by rap artists and manufactured pop acts, which are wholly inappropriate for the proposed music format. In this respect an album track is a quality piece of music that does not have to be, or have been, a "hit single." The term "melodic album tracks" was used to offset any thoughts of screaming guitar riffs that may have been formed by the term "Rock." At all times the music format would be accessible to a wide audience. Just as this market's leader, BBC Radio 2 is "different" in offering a wider variety of music in its core daytime hours, so will EKR Ashford.

Rather than being slaves to the pop charts EKR Ashford will "cherry-pick" our new music from the most suitable of the current hits. We will also select non-charting single releases, plus album tracks that suit our more adult contemporary audience to unite this blend.

This is not a completely unknown and untested style of presentation. BBC Radio 2 recently "A listed" the most recent album from Elton John, often playing a wide variety of tracks from it. BBC Radio 1 followed likewise with the new U2 album. EKR Ashford would establish a similar pattern with new album releases from major artists however, we are aware that to maximise our audience and with a commercial responsibility, an unfamiliar new album track might be preceded and followed by songs that our typical listener would be familiar with.

4. In the music cluster tests, were the respondents given any written or audio examples of the types of artist or tracks represented by each category?

Respondents were given a show-card that listed blocks of artist's representative of a number of musical genres. The blocks were presented to respondents without genre labels so that respondent opinion was based on the music styles represented by the artist blocks rather than any personal and potentially differing preconception of music style that genre labelling could generate.

5. In the music cluster tests, please explain your rationale behind combining "soft rock" and "indie" music as a single category, and also why there was no category (aside from jazz) representing older rhythmic genres, such as soul.

As stated in 9) above, respondents were shown blocks of well-known artists names on which to base their opinions. Genre descriptive labels were added later by the research company as an honest representation of the style of music depicted by the artist blocks. The burgeoning number of genre and sub-genre classifications used and disputed within the music industry has led to:

- ▶ Differing opinions on the genre classification of many artists and
- ▶ The necessity of artists producing music that crosses over these artificial boundaries to reach a large audience.

The term "Indie" music is a throwback to the late 1970s & 1980s and is traditionally used to describe the genre of artists that sprang from small record labels as a result of the Punk and New Wave era. In recent times the term is difficult to "pigeon hole," as the era of true "Indie bands" on "Indie labels" has long passed. Therefore it was used in a context to which a potential listener might relate. That is, music from artists whose careers are in their early stages, are on the adventurous edge of mainstream music and have a predominantly guitar sound & rock base. We firmly believe that the so-called "Indie" rock music of today has its roots in the rock music of yesterday. The "Indie" genre that we linked with "Soft Rock" is primarily comprised of modern guitar bands and we believe that this is the genre of artist that the term "Indie" would suggest to potential listeners at the point of a survey. Typical recent examples of the genre that we were suggesting would include "Snow Patrol," "The Zutons", "Franz Ferdinand" and "Maroon 5." We strongly believe that music from these new artists would interface very well with the older "Soft Rock" core artists such as "The Who," "The Beatles", "Dire Straits", and "The Rolling Stones" plus the newer artists from that genre such as "Oasis", "U2" and "REM".

Many of the artists depicted in the artist blocks may have been equally well included in another block. For example: Nina Simone, Leann Rimes, Lionel Ritchie, Rod Stewart, David Gray, and David Bowie.

There is a finite length to the concentration span of an interviewee and previous experience has established that twelve representative artist blocks of the type used in the survey is about the maximum number that can be tested and produce reliable results. Given, as already mentioned, the large number of genre classifications, it was not possible to test every single genre within the twelve blocks, so other genres such as "Motown", "Heavy Metal", "Trance" etc. etc. etc. were not specifically represented.

The research did not set out to provide a definitive breakdown of the mix that EKR Ashford should play, but rather to establish broader patterns of listening and tolerance of "other than favourite" music styles. The artists selected did provide a range of listening to cover the core audience age range of the station with, besides "Jazz," the blocks illustrating "Easy Listening," "Country", "Classic Rock 60s & 70s" and "Pop Classics" all of which are likely to appeal to the more mature age groups.

Whilst "Soul" music was not tested with a dedicated artist block in our 2004 survey, arguably, the lineage of the genre is represented by artists within other blocks such as Nina Simone, Ella Fitzgerald, Lionel Ritchie and, to a lesser and more modern degree, R Kelly. However, whilst the absence of a "Soul" block does not detract from the value of the research in establishing breadth of listening and genre tolerance, in hindsight it may have been helpful to have included a block of artists representing the Genre.

The indicated playlist and musical style for EKR Ashford would not be based solely on the findings of the "Format Test & Reach Study" of this survey, but rather the product of prior research studies, RSL broadcasts, satellite broadcasting and years of involvement in the development of independent radio in the South East by the principles of East Kent Radio Limited.

6. Why have you decided to programme a different, rock-based, music policy for overnights?

The proposed overnight service has its roots in the “Night Tracks” programming offered by EKR during the experimental broadcast phase on satellite and DAB in the late 1990s. That programme was re-broadcast as a sustaining service by many stations across Europe, each with their own various musical formats and styles.

Although the new “Night Tracks” for EKR Ashford would be given a slightly stronger “rock bias” than the daytime output of the station the EKR definition of rock in this context is very much based on the softer side of the format. Core artists for the overnight service would be: -

1960s: The Beatles, Rolling Stones, The Who;
1970s: Fleetwood Mac, David Bowie, Supertramp;
1980s: Dire Straits, Bruce Springsteen, Genesis;
1990s: REM, Sting, U2;
2000s: Coldplay, Sheryl Crow, Snow Patrol.

The service would still be very accessible to our core listeners, although significantly more interesting than the “staple diet” of much local radio overnight programming. We recognise that it is important, in an area with a relatively small TSA, not to compromise the daytime listeners by offering something so radical that they reach for the off switch. Instead, we see the overnights as an opportunity to entice disenfranchised listeners from the mainstream rivals, such as Invicta FM, by offering them the musical variety that our research indicates many of them crave.