



An application for the Bristol local FM licence

July 2018

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Executive Summary

Bristol – we’ve missed you! We are delighted to have the opportunity to submit this application to re-establish the successful FM Bristol radio station Jack FM.

In recent years, the UK commercial radio market has changed beyond all recognition. Innovations in how listeners consume radio and audio, alongside the opportunities that reduced regulation brings, have contributed to how local radio is made and heard. There is a huge variety of devices and platforms that can access radio, with particular challenges for local stations in competitive city markets such as Bristol where the BBC dominates and powerful national commercial brands are taking increasing levels of audience share.

This makes it more important than ever that the remaining independent local commercial stations use the spectrum they have to provide effective, successful services. We understand the benefit of this public spectrum and that we must use it to add choice for listeners, create jobs and create local economic benefit.

Jack FM has already been a success in Bristol. Originally launched in Bristol in 2010 it quickly became the UK’s fastest growing radio station. Jack FM took over from a failed station and listeners immediately loved the station, making it the UK’s best performing new radio brand. In Bristol, Jack FM achieved a 19% reach and 6% market share in a very short space of time. Local advertisers were delighted to finally have a station delivering a viable alternative to Heart. However, in April 2015 the licence holder decided to axe Jack FM announcing that its replacement would yield “greater success”. It hasn’t quite worked out that way.

Indeed, the replacement service, SAM FM, achieves just half the audience share of Jack FM. This decline has contributed to local commercial radio’s share of listening in Bristol falling to just 20.3%, significantly below the UK average of 27.4%. RAJAR highlights SAM FM as having the lowest average hours of any local station. Our research found SAM FM to be the least popular commercial station in Bristol with a 10% weekly reach, and with just 6% reach in its core male 35-54 audience. This is Jack FM’s heartland – in its day, Jack FM Bristol delivered an incredible overall 82% male audience profile, with its strongest audience segment being males 45-54 (RAJAR Q3 2014).

We are confident that Jack FM can once again come to the rescue of commercial radio in Bristol and provide a new, innovative and popular choice for listeners. Having analysed the Bristol marketplace and reviewed our research, we believe this Bristol FM licence requires:

- National values and quality – RAJAR shows national radio brands perform disproportionately well in Bristol – Jack FM is a station with national production values and brand recognition.
- A proven performer – Bristol is a competitive market and Jack FM’s track record suggests we will achieve commercial success faster than the current operator or a new, unknown brand.
- A robust broadcast footprint – available on FM and on DAB across Bristol and Somerset, will enhance our commercial prospects, meaning Jack FM will add choice for a significant number of West Country listeners.
- Locally produced output – all of our programming will come from our Bristol content centre – ensuring we are well placed to serve the local tastes and interests identified in our research.

- Credible and relevant local news and information - news will be provided in partnership with South West News Service (SWNS), the South West's premium local news supplier.
- To be operated by a proven, successful operator - Nation Broadcasting's proposal offers certainty and scale to the market and, as digital radio advocates, we will use this FM licence to further promote DAB.

In making this application, we have carefully considered the requirements set out in section 105 of the Broadcasting Act 1990, namely;

a) the ability of each of the applicants for the licence to maintain, throughout the period for which the licence would be in force, the service which he proposes to provide.

Whilst this is a relatively large licence, we must remember that Bristol has been the graveyard of many operators. In today's competitive market, a station that does not have the support of an established operator, such as Nation Broadcasting, may not be viable.

Jack FM Bristol will be operated by Nation Broadcasting an established, cash generative business. We have our group headquarters across the Severn Bridge and a track record running successful local radio stations across the UK.

Bristol is a natural geographic business extension for Nation Broadcasting - we already work with significant regional clients and agencies in the city. With the M4 tolls soon to be removed, many existing clients are interested in reaching customers in Bristol. If we can achieve anything like the audience levels previously hit by Jack FM Bristol, the service will quickly achieve commercial success.

Nation Broadcasting has demonstrated considerable commitment to operating in Bristol - this is our third application for a local service. We applied for this licence in 2006 and were recently unsuccessful applying for the city's smaller commercial radio licence.

b) the extent to which any such proposed service would cater for the tastes and interests of persons living in the area or locality for which the service would be provided, and, where it is proposed to cater for any particular tastes and interests of such persons, the extent to which the service would cater for those tastes and interests.

We will reflect the demand for the popular content elements in our research. We know our target audience has a proven interest in Jack FM's music format - classic rock and pop rock hits of the 1980s and 1990s. Based on its previous Bristol experience, we know that a rock based format with this music mix will appeal to a predominantly male audience and that it performed exceptionally well amongst the core male 35-54 audience. We will provide for our listeners' interest in Bristol news, weather, travel and sports information. Our relationship with Bristol-based news provider SWNS means we can provide over 100 news bulletins each week, offering a greater number of locally relevant stories than any other station.

With an available 35+ audience in Bristol of over 400,000, including nearly 200,000 men, this licence offers a considerable commercial opportunity. Crucially, Jack FM has proven appeal to this demographic - it previously achieved an impressive reach of 19% and a market share of 6%, with 82% of its listening coming from adult males and its strongest audience segment being males 45-54 (RAJAR Q3 2014). We are confident we can quickly re-engage with this identifiable and loyal audience.

Our research revealed that 55% of our target audience think that being on DAB is important. RAJAR suggests that the incumbent's lack of DAB is stunting its growth and has, possibly, contributed to its decline. Indeed, its lack of investment in DAB is the very reason this licence contest is open.

c) the extent to which any such proposed service would broaden the range of programmes available by way of local services to persons living in the area or locality for which it would be provided, and, in particular, the extent to which the service would cater for tastes and interests different from those already catered for by local services provided for that area or locality;

We note Ofcom has previously advised that this Bristol service was a "larger licence" – and that broadening of choice via music proposals in assessing section 105(c) - might be considered more significant overall than section 105(b) - the applicants' ability to cater for local tastes and interests.

Our 35+ male audience target has previously demonstrated itself to be distinctive to the market's other commercial stations; Heart (under 44s) and Kiss (under 30s) and The Breeze (easy listening for over 40s), with Bristol's local community stations serving niche and non-mainstream audiences.

We know that there is a significant opportunity in Bristol for Jack FM. Operating between 2010 and 2015, Jack FM proved – beyond doubt – its ability to broaden choice in Bristol. The station achieved significant audience success and proved itself a strong alternative service to Kiss, Heart and Breeze. Our RAJAR analysis demonstrates that we perform far more effectively than the incumbent in reaching our target audience.

Musically, we will be distinctive. Our monitoring confirmed no other station plays a variety of classic rock and pop rock giving us a unique character, and with 60% of our music coming from the 1980s and 1990s, Jack FM is less contemporary than Kiss, Heart and Breeze. With regards music variety, we will play twice as many unique tracks of any other station, with our library of around 850 unique songs comparing with Kiss (444), Heart (308) and The Breeze (734).

Our monitoring found a comparatively low level of Bristol news on other stations – Jack FM will have more news and travel bulletins than any other station whilst in local production we will be distinctive to other services, with all programming made here in Bristol.

d) the extent to which there is evidence that, amongst persons living in that area or locality, there is a demand for, or support for, the provision of the proposed service.

Jack FM Bristol consistently achieved a reach of 19% and audience share of 6%, proving the appeal of its service. Our recent market research confirms continuing demand in our core 35-54 male audience target for a variety-led music station, with particular demand for music from the 1980s and 1990s – Jack FM's musical heartland. We will also provide the speech and information elements that proved popular in our research, namely Bristol news, weather, sports news and travel news.

We have received expressions of support from advertisers, businesses and media owners in Bristol and we look forward to working with these stakeholders as we build Bristol's new local radio station.

General information

(a) Name of Applicant, Address, Telephone and E-mail address

Note for new applicants: This must be a single legal entity: either a body corporate or a named individual person. If the former, a copy of the certificate of incorporation must be included with the application.

Bristol Sound Limited

(Certificate of incorporation is included at the end of this application).

(b) Main Contact (For Public Purposes)

Please nominate at least one individual to deal with any press or public enquiries, stating:

Name: Jason Bryant

Telephone (daytime): 02921 414100

Address: Nation Broadcasting, St Hilary Transmitter, Cowbridge, CF71 7DP

E-mail address: jason.bryant@nationbroadcasting.com

(c) Station Name (if decided)

106.5 Jack FM Bristol

(d) Main Contact (For Ofcom Purposes)

Please nominate one individual to whom questions of clarification and/or amplification should be sent, stating:

This information is provided in the confidential appendix.

This information may be submitted in confidence, separately from the other responses in this section.

Section 105(A): Ability to maintain proposed service

1. Ownership and control of company which will operate the licence

(a) Board of Directors

i) Provide the name, occupation, other directorships, other media interests, and, if not a director of an existing Ofcom radio licensee, the relevant media experience, of each director (executive and non-executive), including the proposed chairperson.

Jason Bryant

Executive Chairman
Nation Broadcasting Ltd

Launch Director
Jack FM Bristol

Directorships

Nation Radio Ltd, Haven FM (Pembrokeshire) Ltd, Radio Carmarthenshire Ltd, Nation Broadcasting Ltd, Radio Ceredigion Ltd, Bridge FM Radio Ltd, Swansea Bay Radio Ltd, MuxCo North East Wales & West Cheshire Ltd, MuxCo Wales Ltd, MuxCo North Wales Ltd, Digital Broadcast Technologies Ltd, Radioscape Ltd, MuxCo Suffolk Ltd, Nation Resources Ltd, Nation Digital Ltd, Country Broadcasting Ltd, Thames Radio Ltd, Bristol Sound Ltd, Dragon Radio Ltd, Nation Radio Scotland Ltd, Sun FM Ltd, Ipswich 102 Ltd.

Jason founded Nation Broadcasting in 2001 and has overseen its growth into a successful media business with interests across the UK. Nation Broadcasting operates a number of local and regional commercial radio stations and DAB multiplex licences. Nation Broadcasting has a growing digital media business and is the lead investor in Factum Radioscape, the world's largest DAB multiplex software provider. Jason's all round experience in programming, commercial and digital make him well qualified to be our launch director.

Martin Mumford

Managing Director
Nation Broadcasting Ltd

Directorships

Country Broadcasting Ltd, Radioscape Ltd

Martin has worked in commercial radio for over 20 years, managing stations through launch, early development and turnaround. Martin has a broad operational skill-set including programming, finance, scheduling, sales, HR and engineering. Martin has overseen the launch, acquisition and integration of many new businesses into the group and is responsible for the operational management of Nation Broadcasting. Martin will ensure Jack FM Bristol launches on time and on budget and that it takes full advantage of the group's infrastructure.

ii) If there are firm plans to appoint any further directors, provide information (with details of any specific individuals in mind). This information may be submitted in confidence.

If awarded this licence, we will appoint Ian Walker, CEO of Oxis Media, owners of the Jack FM brand, to the board.

Ian will ensure that Bristol's Jack FM builds on its initial success in the city. Ian was launch Programme Director of the first Jack FM station outside of North America - 106 Jack FM in Oxford. Ian also oversaw the original introduction of Jack FM Bristol in 2010.

(b) Investors and Shareholding Structure

i) Full details of the shareholding structure should be provided, including:

ii) Names and addresses (the latter may be submitted in confidence) of all existing or proposed shareholders.

iii) Total number, class/classes of shares and issue price of shares (specify voting, non-voting, preference, other etc.).

iv) All voting shareholders and holders of 5% or more of non-voting shares and loan stock should be named. State the number, class/classes and price of shares to be issued to each investor.

v) Outline any shareholders agreements or arrangements which exist.

vi) Where a corporate body other than a current Ofcom licensee will be providing 30% or more of the required funding, details should be given of its directors and main shareholders, and of its activities. Ofcom may request additional information (e.g. a banker's letter, statutory/management accounts) regarding the shareholders, or any other providers of finance, listed in the application.

There are 100 ordinary £1 shares issued in Bristol Sound Limited to Nation Broadcasting Limited.

Ofcom holds the details of the broadcasting interests and shareholding structure of Nation Broadcasting Limited.

(c) Involvement of the Applicant in Specified Activities

Details are required of the involvement by the applicant and its participants (including shareholders or other subscribers of more than 5% of the applicant's total funding requirements) in any of the activities listed below, and the extent of the interest. For these purposes, the applicant includes associates of the applicant (i.e. directors and their associates and other group companies).

- i) Advertising agencies;
- ii) Newspapers;
- iii) Other broadcasting interests;
- iv) Bodies whose objects are wholly or mainly of a religious nature;
- v) Bodies whose objects are wholly or mainly of a political nature;
- vi) Local authorities;
- vii) Other publicly-funded bodies.

* Applicants should note that this information is required for the purposes of checking compliance with the ownership rules, and is not relevant to an applicant's ability to maintain its proposed service. If none of the categories above apply to the application this should be clearly stated.

Bristol Sound Ltd is a wholly owned subsidiary of Nation Broadcasting Ltd. Neither company is involved in any activities listed above, save for iii), the Group's other broadcasting interests, which have been previously declared to Ofcom.

2. Financial and business plan

(a) Overall Financial Strategy

Provide a concise (maximum 500 words) summary of how the applicant considers it is able to establish and maintain, throughout the licence period, its proposed service, and how this licence fits in with the investors' strategy.

Cash generative, with no external debt, Nation Broadcasting is well placed to re-establish Bristol's Jack FM. Our track record of successful station launches gives us full confidence that we can build on Jack FM's previous success in Bristol to create a very successful and profitable local radio station.

Nation Broadcasting's strategy is to grow its radio business by offering listeners popular local brands, with a point of difference to commercial national services, and which provide local advertisers with effective, cost efficient marketing solutions. Jack FM is a proven brand in Bristol and, historically, achieved significantly higher audiences than the current licensee. Jack FM is also a proven performer in our target demographic, clearly catering to their tastes and interests.

To deliver a successful Bristol station, in line with our expectations, experience and research, we have developed a number of working partnerships. Firstly, we will work closely with Oxis Media - owners of the Jack FM brand - who will consult on programming for Jack FM Bristol. Oxis will schedule music and scripted voice content from the "Voice of Jack", Paul Darrow. In news, we will work with South West News Service, Bristol's leading news agency to deliver an optimum local news service, delivering the content the local market demands, whilst Bristol based INRIX will provide traffic information.

Nation Broadcasting's existing relationships with local advertisers and agencies in Bristol makes us well placed to succeed commercially in this competitive, multi-million pound media market. This is our third application for a local licence in Bristol - demonstrating our commitment to the city. If successful, our contiguous FM footprint will exceed 2 million adults (+3M on DAB), making us the second largest commercial radio operator in the region.

Nation Broadcasting is fast-developing its presence in larger UK markets and successfully competes against the leading commercial radio brands that serve, or are audible in, Bristol. Nation Broadcasting invested in its first local radio licence in 2002 and has grown organically and by acquisition. Its group headquarters are across the Severn Bridge in the Vale of Glamorgan, less than an hour from Bristol, and will provide management, traffic, finance, HR, IT and engineering support. We will establish a content centre in Bristol from where local programming will be produced.

Radio consumption is changing and we anticipate the licence period will include digital switch-over. Indeed, we see this FM licence as a bridge to a digital future. Ofcom's 2017 Digital Radio Report confirmed Bristol as one of the UK's highest DAB digital radio penetration and listening areas. Nation Broadcasting is fully committed to DAB and we note that among our core demographic, 55% of males 35-54 felt it important the new station was available on DAB. We have provided for this and believe an FM/DAB strategy can deliver an even stronger business model for us since we will have a significantly larger broadcast footprint. The continuing strong reach of FM, combined with excellent regional DAB distribution, will allow us to provide an attractive audience for our clients.

(b) Funding

Detail the sources of finance that will be used to fund the licence, under the following headings:

- i) Share capital
- ii) Loan stock
- iii) Leasing/HP facilities (capital value)
- iv) Bank overdraft
- v) Grants and donations
- vi) Other (please specify)

Where relevant, provide information on:

- vii) Loan terms (e.g. interest rate, repayment terms, redemption/conversion terms);
- viii) Assets leased.

All of the funding identified above should be confirmed to the applicant. Explanation should be provided if this is not the case.

100% of any funding required will be in the form of interest-free loans from Nation Broadcasting Limited.

Further information is submitted in confidence.

(c) Financial Projections

The purpose of this question is to allow the applicant to demonstrate its understanding of the market. The forecasts should be based on reasonable assumptions, that are logically applied and justifiable.

The applicant should provide financial projections on an annual basis for the licence. The projections must include:

- i) Profit and loss accounts
- ii) Balance sheets
- iii) Cash-flow forecasts

The period covered is at the discretion of the applicant, but should be justified. The forecasts should be supplied on an Excel spreadsheet or similar, with any accompanying guidance notes. The applicant must also complete and submit the spreadsheet entitled "Financial Template" located at: <https://www.ofcom.org.uk/manage-your-licence/radio-broadcast-licensing/apply-for-a-radio-broadcast-licence/timetable-for-analogue-re-ads> using information from its business model.

This section must include a full listing of the underlying assumptions on which the financial projections are based, relating such assumptions clearly to other parts of the application (e.g. proposed format, extent of coverage area).

The applicant should detail how revenue figures were derived, distinguishing between local, national and sponsorship revenue.

The response to this question may be submitted in confidence.

Detailed financial information for the initial three years of operation for Jack FM Bristol have been submitted in confidence.

(d) Audience Projections

New applicants should provide the following information:

i) The projected adult (aged 15+) population of the Total Survey Area (TSA) within which it is intended to measure the listenership of the service;

The projected adult 15+ TSA population is 652,000, the same as the incumbent to maintain RAJAR continuity.

We note this licence's regional characteristics and we will broadcast Jack FM on both the Bristol and Somerset DAB multiplexes, adding further scale to the business. In time, we may decide to adopt a larger TSA that combines Bristol and Somerset but we believe this will occur outside the initial three years of operation.

ii) Projections for listenership ratings (e.g. weekly reach, average weekly hours of listening) over the first three years of the service, with detailed demographic breakdowns as appropriate;

Jack FM's forecast audience performance is shown in the table below.

	Year 1	Year 2	Year 3
15+ Population	652,000	652,000	652,000
Reach	104,320	110,840	117,360
Reach %	16%	17%	18%
Avg. Hours	6.0	6.5	6.7
Total Hours	625,920	720,460	786,312

Source: Nation Broadcasting

We believe that, as previously, Jack FM Bristol will deliver a heavily male biased audience profile aged 35+. Previously, more than 80% of all listening hours to Jack FM Bristol came from men aged 15+. With our broad target being 35+ and with nearly 200,000 males aged 35+ living in Bristol, we are confident that we will achieve a viable audience to sell to local clients.

iii) The expected impact of the proposed service on existing services, in listenership terms;

Generally, we expect our audience to consist of listeners to the current licensee's service, from lapsed Jack FM listeners and from new listeners from other services.

Whilst we do not believe they will exclusively come from any single station, we noted some strong switching indications in our research. 44% of our core audience target (M35-54) said they would stop listening to BBC Radio 2 and 21% of this group said they would listen less to accommodate Jack FM. This is encouraging and suggests strong appeal for a local service that provides music variety and rock/pop-rock music not offered by the BBC's largest national music station.

Consistent with this is our observation that commercial radio performs poorly in Bristol, with a low audience share relative to the rest of the UK - just 20.3% - significantly below the UK average of 27.4%. Jack FM can certainly improve this performance.

77% of our core target audience (M35-54) said they were definitely/very/quite likely to listen to the new station. Of this core, 19% would spend more time listening to the radio in order to incorporate the new service. In terms of stations switch, as already mentioned, we find it extremely encouraging that 44% of our core target audience would stop listening to BBC Radio 2 and 21% would listen less, to accommodate Jack FM in their listening repertoire.

iv) In what way(s) do you expect to achieve an audience which is different in size and/or composition from that attracted by the existing service provided under the licence now being re-advertised? To what extent, and in what ways, do you believe that existing audience figures can be improved upon?

We are confident that our audience will be considerably larger than the existing service and that its audience will be more successful within its target age range. We recognise that we face a challenge to re-establish the brand but, with Heart having experienced a steady audience decline in recent years, we believe there is a possibility that, within five years, Jack FM could become the leading commercial radio station in Bristol.

Our projections take account of today's more competitive environment, particularly with regards the growing number of national DAB digital radio services. Balanced with this is the fact that the incumbent has not made itself available on the local Bristol DAB multiplex, excluding a large number of potential listeners. Our research suggests strong support (55%) from our core M 35-54 audience target for the new station to be available on DAB.

Whilst our projections are significantly ahead of SAM FM's current performance, they are in line with Jack FM's previous achievements. Jack FM achieved a steady reach of between 17% and 19% between 2012 and 2015. Our Year 3 projection of 786,000 hours is below the highest total hours previously achieved by Jack FM (832,000 hours, Q4 2014). The original winning applicant in 2006 projected a listenership of 19% in Year 3 - something only Jack FM has ever achieved on this frequency.

It is worth remembering that Jack FM launched from the ashes of Original FM in Q2 2010 and it grew incredibly quickly from just 6% to 17% by Q1 2011. This was achieved with minimal marketing and with one less analogue station on air (Smooth). As Jack FM, the respective audience highs were 122,000 listeners (19% reach), 7.3 average hours and 832,000 total listening hours (6.0 % share). Many agreed that Jack FM was, at the time, the best performing new radio brand in the UK.

RAJAR also confirms Jack FM had a better awareness to audience achieved conversion rate than SAM FM. In its peak quarter - Q4 2014 - Jack FM achieved a market share of 6% from 46.8% awareness, whereas in its most recent RAJAR, SAM FM achieved a 3% market share from 48% awareness.

Finally, we believe that being a fully Bristol based station, with all programmes produced locally, will deliver a significant audience dividend. In its successful 2006 application document, the applicant said it was "designed, from the outset, to be a stand-alone operation and is fully resourced to be a major station, in a major city". Today, SAM FM shares programming with Swindon and Southampton - population centres with little, if anything, in common with Bristol. In summary, the following factors lead us to conclude why we can significantly improve on SAM FM's performance;

- The proven audience performance track record of Jack FM in Bristol.
- Programming will be overseen by OXIS Media - owners of the Jack FM brand and responsible for much of its success previously.
- Jack FM will be available on DAB across Bristol and the west improving our potential audience. The incumbent does not offer listeners its service on DAB, limiting its audience potential and commercial opportunity.
- The strong appeal indicated for a variety music format in our market research.
- We compete successfully with Heart, the Bristol market leader, in many of our existing local radio markets.
- Heart Bristol has suffered recent significant falls in audience, yet the incumbent has failed to take advantage of this decline.
- Jack FM will have significantly more locally produced programming than the incumbent.
- Our core target audience of 35+ men makes it easier to target and market Jack FM and we have budgeted for ongoing marketing commitments to stimulate awareness and re-trial of Jack FM.

v) The basis on which the estimates above have been calculated, and any assumptions taken into account.

In estimating likely audience levels, we considered our research findings and also analysed historical RAJAR data from Jack FM's service on 106.5 in Bristol between 2010 and 2015.

This made audience predictions relatively easy compared to other licence applications we have made, since they are based on the same format on the same frequency in the same city! This gives us confidence that they are realistic and achievable, even considering the increased choice from online and digital services.

Our research showed a total of 77% of the total population, and the same proportion of our core audience demographic of males aged 35-54, claimed to be either very/quite definitely/likely listen to a new local station for Bristol. This indicates a strong desire for a service which has a variety-led musical remit, that values the inclusion of a wide range of Bristol news and information.

44% of male respondents aged 35-54 said they would change their listening behaviour to accommodate Jack FM and stop listening to BBC Radio 2, with 21% listening less. Since BBC Radio 2 is - by far - Bristol's largest music radio station - these findings confirm our confidence in our prospects for a second spell of success for Jack FM in this market.

The detailed findings of the survey combined with our analysis of the market as a whole, including in depth analysis of RAJAR data within the SAM FM TSA, leads us to the conclusion that a service that focuses on the needs of Males aged 35+ and with a core age range of 35-54 is very likely to deliver sustainable audience levels and therefore achieve commercial success in Bristol.

3. Transmission proposals

New applicants proposing to use the same transmission site(s) and parameters as the existing licensee should provide the following information:

a) Have you entered into negotiations with the owner/operator of the site(s) regarding arrangements for the new licence period? If so, provide details; if not, state what arrangements are anticipated.

If awarded this licence, we confirm that we will continue the service without interruption from the current site below. We have a reference offer from Arqiva for the current transmission site in use for this licence.

Site	Bristol East Dundry Lane
NGR	ST 57372 66498
Tenure	Leasehold
Site height	194m

We will contract with Arqiva for a Total Broadcast Contract to manage the transmission of the service. Arqiva is an existing supplier delivering transmission infrastructure and support to other radio stations operated by Nation Broadcasting.

Confirm that the applicant will be in a position to commence broadcasting its proposed service from the expiry date of the existing licence being re-advertised. If relevant, discuss (in a separate confidential appendix, if necessary) any factors which might lead to a commencement of broadcasting on any other date. Applicants should note that failure to commence broadcasting the service within two years of the date on which the licence is awarded is likely to lead to the offer of a licence to the successful applicant being withdrawn. In these circumstances the licence would be advertised afresh and a new competition would be held to award the licence.

We confirm that Jack FM Bristol will be in a position to commence broadcasting its proposed service from the expiry date of the existing licence.

Section 105(B) and (C): Catering for tastes and interests/ broadening choice

4. Format

JACK FM BRISTOL

Licence number	AL319
Licensed area	Bristol and surrounding area
MCA population	539,064
Frequency	106.5 MHz

Character of Service

AN ADULT MUSIC STATION FOR BRISTOL AND THE SURROUNDING AREA, PLAYING A VARIETY OF POP/ROCK AND CLASSIC ROCK FOR OVER-35s WITH FREQUENT LOCAL NEWS AND INFORMATION.

Service duration	24 Hours
Locally-made programming	<i>Studio location: Bristol</i>
	<i>Locally-made hours: At least 21 hours per day (must include breakfast and weekend breakfast).</i>
	<i>Programme sharing: None.</i>
Local news	Local news at least hourly during weekday daytimes and weekend peak times.

Definitions

Speech	Excludes advertising, programme/promotional trails & sponsor credits
Peak-time	Weekday breakfast and drive-time, and weekend late breakfast
Daytime	06.00 to 19.00 weekdays and weekends

Notes

This Format should be read in conjunction with Ofcom's published Localness Guidelines:

<http://stakeholders.ofcom.org.uk/broadcasting/radio/localness/>

5. Programming Philosophy

a) Explain (in no more than 500 words) how your proposed Format will cater for the tastes and interests, general or particular, of persons living in this local area;

Our philosophy is simple – to return the world famous Jack FM to Bristol.

We will reflect the demand for popular elements from our research. We will cater for Bristol's 35+ audience, with a core focus on 35-54 men. Our analysis highlights this audience remains underserved by commercial radio. Jack FM has proven appeal with this demographic, demonstrated by its historical RAJAR performance, and with impressive audience milestones including a 19% reach, 832,000 listening hours, average listening hours of 7.3 and a market share of 6%. With 82% of listening being 15+ males and 38% of all hours from men aged 45-54 (RAJAR Q3 2014) – we are clearly effective in appealing to our core audience target.

Jack FM will, naturally, play what we want. Our research found 73% of our core audience thought it important to have a broad variety of music, with particular support for songs from the 1980s and 1990s. We will cater for this with our known and proven music format – classic rock and pop rock hits of the 1980s and 1990s. RAJAR confirms rock formats deliver to a predominantly male audiences, in line with our target.

To fulfil the need for music variety, our active music database will comprise 850 adult oriented classic rock and pop songs, with the playlist being regularly refreshed to avoid songs sounding tired. This will provide more music variety than the incumbent, and greater variety than other stations, proving Jack FM remains most in tune with its audience's tastes and interests.

Bristol has an above average ABC1 population profile and Jack FM's speech content make it a proven performer in this demographic. We will provide for our audience's interest in Bristol news (55%), weather (78%), travel news (67%) and sports news (53%). Our relationship with Bristol-based news provider SWNS means we can provide over 100 news bulletins each week – greater than any other station. Our presenters live locally so will talk about Bristol with knowledge – important in our research, where 58% felt presenters should “know and understand the local area”.

The distinctive, original 'Voice of JACK' (Paul Darrow) will return, adding personality and comedy to the station. Also returning are Bristol 'JACK-tivities' (What's Ons), a great mechanic to keep in touch with local events, campaigns and live music in Bristol. Nation Broadcasting has an active events team and we plan to introduce a number of our popular station community events to Bristol.

Our research revealed that 55% of our target audience think that being on DAB is important. RAJAR suggests that the incumbent's lack of DAB is stunting its growth and has, possibly, contributed to its decline. We will provide for this demand, with availability on the Bristol (and Somerset) local DAB multiplex.

Finally, we believe local content is a competitive advantage and our commitment to 21 hours a day of local programming is based on what we provide at other stations and which, we know, will prove popular in a city with a proud sense of its identity.

New applicants should answer the following question:

b) Explain (in no more than 600 words) how your proposed Format will cater for tastes and interests different from those catered for by other existing local commercial and community radio services available in this local area, apart from the service currently being provided under the re-advertised licence you are applying for.

Five years broadcasting to Bristol have already proved that Jack FM can provide a clear alternative in this market.

Ofcom has previously advised that this Bristol service was a “larger licence” - and that broadening of choice via music proposals in assessing section 105(c) - might be considered more significant overall than section 105(b) - the applicants’ ability to cater for local tastes and interests.

Our RAJAR analysis demonstrates that Jack FM performs more effectively than the incumbent in reaching its target audience demographic, who clearly appreciate our classic rock and pop rock, variety-led format.

Reviewing Ofcom formats, Heart targets under 44s, Kiss under 30s and The Breeze over 40s. Community stations BCFM and Ujima cater for specialist and niche audiences. Recently awarded SWU.FM will broadcast urban, electronic and dance music to young people. No other analogue station targets a predominantly male 35+ audience, confirming Jack FM as a clear and proven alternative format for Bristol.

Our music monitoring confirmed that Heart and Kiss play current and recent hits and The Breeze plays melodic, easy listening songs. No other station plays a variety of classic rock and pop rock centred on the 1980s and 1990s. Jack FM is distinctive by being less contemporary than Kiss and Heart, and by virtue of its classic rock oriented playlist. Our monitoring revealed just 18% of songs from the 1980s and 13% of songs from the 1990s were played by existing stations. Our target listeners’ musical tastes were defined in their youth - predominately the 1980s and 1990s - and Jack FM will own these decades, with 60% of its total music coming from them, significantly higher than any other station in Bristol.

Our median musical year is 1987, older than Heart (2009) and Kiss (2015), and younger than The Breeze (1984). Recent music dominates Heart (74%) and Kiss (94%). Breeze has 18% of recent songs. Jack FM will play just 14% - the lowest in the market. In terms of music genre, we will be the only rock oriented service in contrast to the pop (Heart), urban (Kiss), and easy listening (Breeze). In terms of music variety, which our research deemed important, we will play twice as many unique tracks (850) compared to Kiss (444) and Heart (308) and more than The Breeze (734).

Our speech elements - news, weather, travel and sports information - as well as general programme chat will be produced in Bristol, reflecting the demand in our research and providing a further point of difference to externally produced output. Our monitoring revealed a low level of Bristol news on existing commercial stations. Jack FM will include a minimum of three Bristol stories in every news bulletin and over 100 bulletins a week - no other commercial station comes close with our monitoring highlighting that Kiss offers no local news, Heart and Breeze provide one or two stories, Neither community station provides any local news.

Local weather and traffic information scored very highly as important in our research, particularly with regards our target 35-54 core audience, and more generally for three quarters and two thirds of the overall adult population respectively. We will satisfy this demand with a minimum of two traffic and two weather updates each hour in peak time, and at least hourly in daytime, to give a minimum commitment of over 100 travel and 100 weather updates every week, considerably more than any other commercial station in Bristol.

Finally, in providing all of our programming from Bristol, we will be distinctive to all other services which are all predominantly provided from outside of Bristol.

Section 105(D): Evidence of local demand or support

6. Evidence of Demand

New applicants should answer the following question:

Summarise the main findings of any original market research undertaken, or any analysis of existing audience research information, which demonstrates a demand for the type of programme service you are proposing to provide.

If original market research has been undertaken, please provide the following information for each piece of research:

- a) A statement of the key objectives of the research;
- b) The specific questions that the research sought to answer;
- c) How the research was conducted;
- d) The size and composition of the sample(s);
- e) When and where the research was conducted;
- f) A summary of the main findings from the research, showing how these demonstrate evidence of demand for the service proposed;
- g) Full data tables for any quantitative research undertaken (these may be submitted in confidence).

Please provide your responses to (a) - (e) in tabular format.

Jack FM undertook a comprehensive, four stage, programme of research to fully understand the current radio market and the commercial opportunity of re-launching in Bristol.

1. Desk research to generate an understanding of the Bristol economy, population trends and the formats of the city's current local analogue radio services.
2. RAJAR analysis to understand current listening patterns and where commercial services currently provide for local tastes and interests. We also reviewed the historic performance of Jack FM in Bristol between 2010 and 2015.

3. Monitoring analysis to listen to the music and speech output that existing stations are producing for listeners in Bristol and to determine how Jack FM might add to the available local listening choice.
4. Original market research to provide an understanding of local music and speech programming demands and to inform our audience projections.

Desk Research

Key objectives of the research	To provide population estimates, profiles and trends. Review history of the Bristol licence Review Bristol economy Review current media and radio spend in Bristol TSA Analysis - ensuring a sustainable and relevant coverage Review formats of existing commercial services and key commitments of community stations
Specific questions that research sought to answer	Understand current ILR provision in Bristol and possible format gaps Understand the value of the Bristol economy and its media market Understand possible upside of a successful local station in Bristol
How research was conducted	Online / Offline Various sources, Ofcom, ONS, Bristol City Council, CEBR
Size and composition of the sample	Not Applicable
When and where research was conducted	June 2018

Key Findings

Kiss (under 30s) and Heart (under 44s) each have formats that cater for younger listeners in Bristol and they provide for this with a music output consisting of contemporary and recent hits. The Breeze targets over 40s and provides an “easy listening” music format. No other service caters for a male oriented audience aged 35+ and none has a format that stipulates either classic rock or pop rock.

At 652,000, our TSA is large, although smaller than our competitors - Heart (942K), Kiss (1.6M) and The Breeze (1.067M) are all considerably larger, although we note The Breeze conflates a number of smaller licences to generate its TSA.

Bristol is the largest city in the South West and the 8th largest city in England and Wales. The population of the Bristol Urban Area is estimated to be 655,700 (mid-2016). There has been a period of unprecedented population growth in Bristol since 2002. The Centre for Economics and Business Research, one of the UK's leading economics consultancies, says Bristol's economy grew by 1.9% in the year to June 2017, making it the UK's 8th fastest growing economy, with a value of £13.8 billion.

In audience delivery, we note SAM FM has underperformed its original licence application forecasts - it predicted listening hours of over a million by Year 3 but they currently stand at just 368,000. It forecast 52% of its hours would come from males aged 35-54 yet it delivers just 40% of hours from this core target demographic, suggesting a lack of focus on its core audience needs.

RAJAR Analysis

Full data tables have been submitted in confidence.

Key objectives of the research	Provide trend data illustrating the historic performance of radio services, BBC and commercial, in the Bristol TSA, including demographic analysis to draw conclusions about relation of changes in station output to performance.
Specific questions that research sought to answer	To review the performance of SAM FM and other local commercial services in Bristol. How has audience size, demographic and composition changed over the last decade, and since recent programming changes to local commercial radio services. How has commercial radio listening changed? Relative performance of SAM FM in relation to commercial radio listening?
How research was conducted	Desk analysis of RAJAR between 2007 and 2018. We reviewed data for Heart, The Breeze, Kiss and SAM FM.
Size and composition of the sample	SAM FM TSA
When and where research was conducted	Analysis undertaken by Nation Broadcasting Management in June 2018.

Key Findings

In the past ten years, we note that the population in the SAM FM TSA has increased from 552,000 to 652,000 a growth of nearly 20%. Local commercial radio in Bristol underperforms the rest of the UK, and at just 20.3% is significantly below the UK average of 27.4%.

This licence has operated under three brands - Original 106, Jack FM and SAM FM. Each change had a notable impact on the RAJAR performance of the station. Performance analysis of this licence confirms that it performed significantly better as Jack FM.

Original 106 was a lacklustre performer, never generating more than 30,000 listeners or 200,000 hours. The launch of Jack FM saw an explosion in audience interest, and in less than two years its reach had increased to over 115,000 and hours quadrupled to more than 800,00. Its reach and hours remained stable until the middle of 2015, when, with the re-branding as SAM FM in Q2/2015, it has seen its hours halve and reach decline.

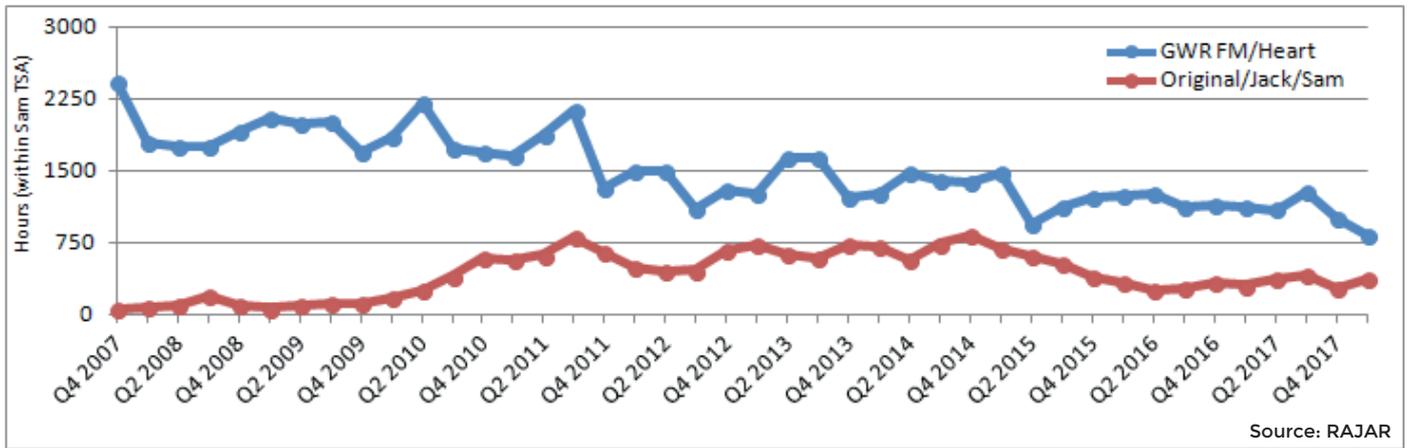
Its success as Jack FM also saw a weakening of the market leader, Heart. As SAM FM launched Heart has recovered.

RAJAR analysis was vital in understanding the overall competitiveness of the market, to understand how poorly the incumbent performs and to confirm that listeners aged 35-54, particularly men, in Bristol are currently under-served by commercial radio. This demographic clearly performs best with the BBC, with the Corporation claiming over 60% of all listening in the male demographics aged 35-54. It claims a similarly high 58.6% share in men aged 55-64 and nearly 80% in men aged 65+.

		Adults 15+	Men 15-24	Men 25-34	Men 35-44	Men 45-54	Men 55-64	Men 65+	Women 15-24	Women 25-34	Women 35-44	Women 45-54	Women 55-64	Women 65+
All Radio	Reach %	96.6	94	92	100	100	93.8	92.7	100	97.7	100	100	98.2	93.5
	Market Share %	100	100	100	100	100	100	100	100	100	100	100	100	100
All BBC Radio	Reach %	77.3	56.6	78.2	87.5	84.4	86.4	84.2	83.9	81.2	61.9	63.2	86.6	73.1
	Market Share %	59	17.1	37.5	60.9	67.7	58.6	79.4	32.7	45.5	35.1	61.4	78.6	76.7

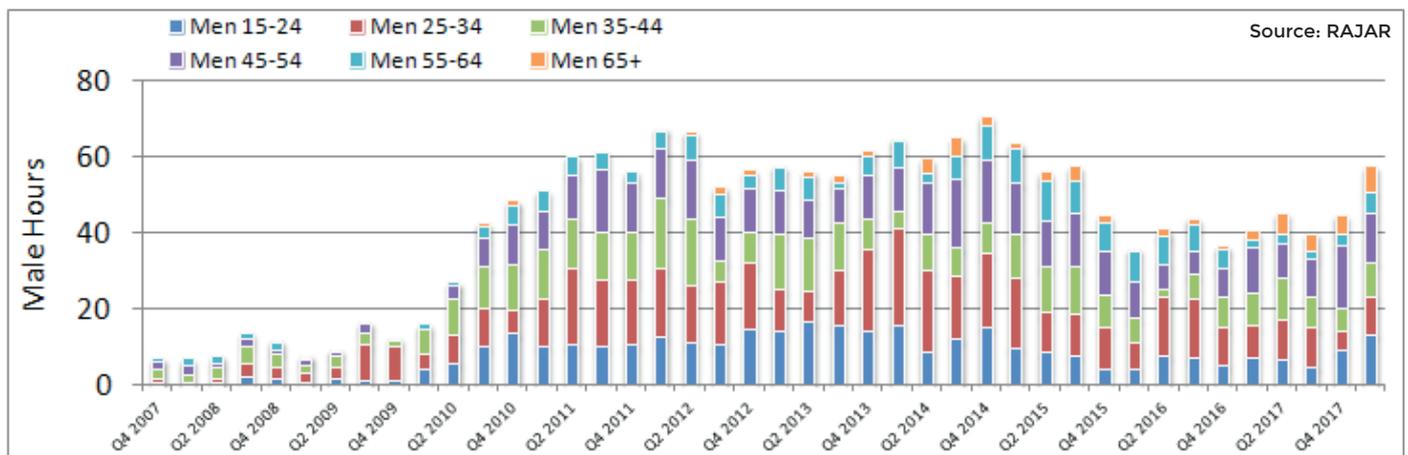
Source: RAJAR, Q1 2018

Looking at the demographic breakdown in the next chart, as well as significant audience growth, the Jack FM years saw impressive audience delivery of men aged 35+. A focused product was easier to market to listeners and sell to advertisers. The re-brand to SAM FM has not only seen decline in male audiences, the demographic has broadened resulting in a confused product for listeners and advertisers.



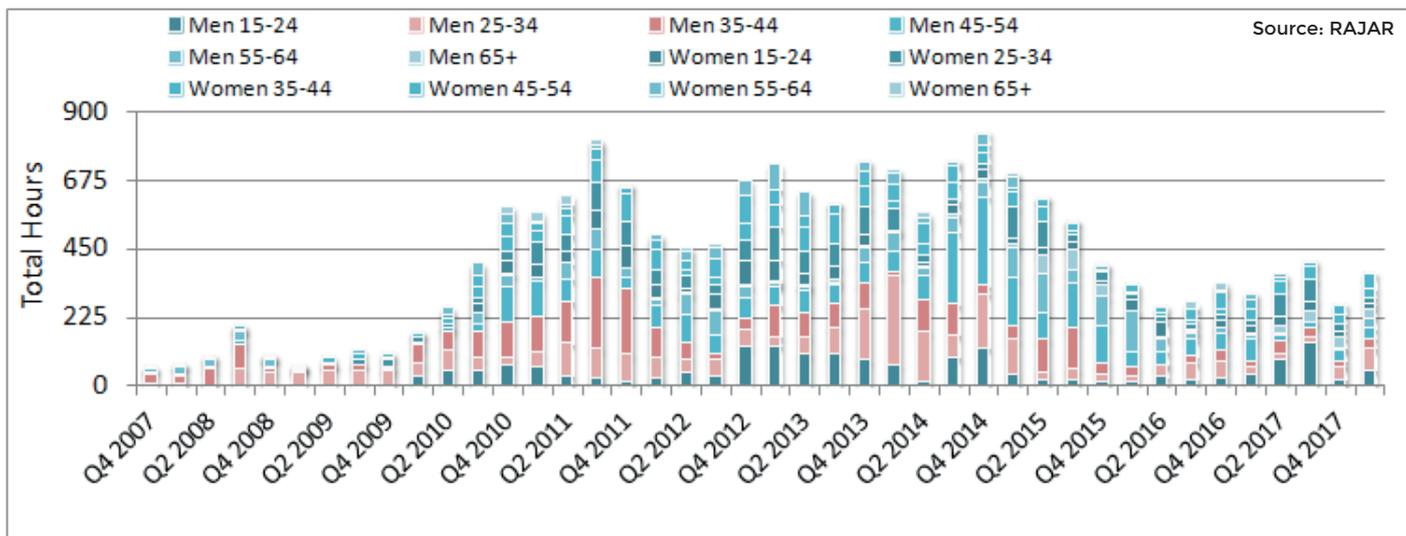
We note that the original winning application in 2006 forecast that 52% of its hours would come from adults aged 35-54 - yet SAM FM delivers just 40% of hours from this core target demographic. Indeed, SAM FM's best reach performance is currently in the 25-34 demographic - an audience already well served by Heart and Kiss in Bristol.

A targeted product is always going to attract an audience outside of the market, but looking at hours across all demographics, Jack FM delivered solidly for the core audience, this concentration then disappeared as the SAM FM re-brand took effect.

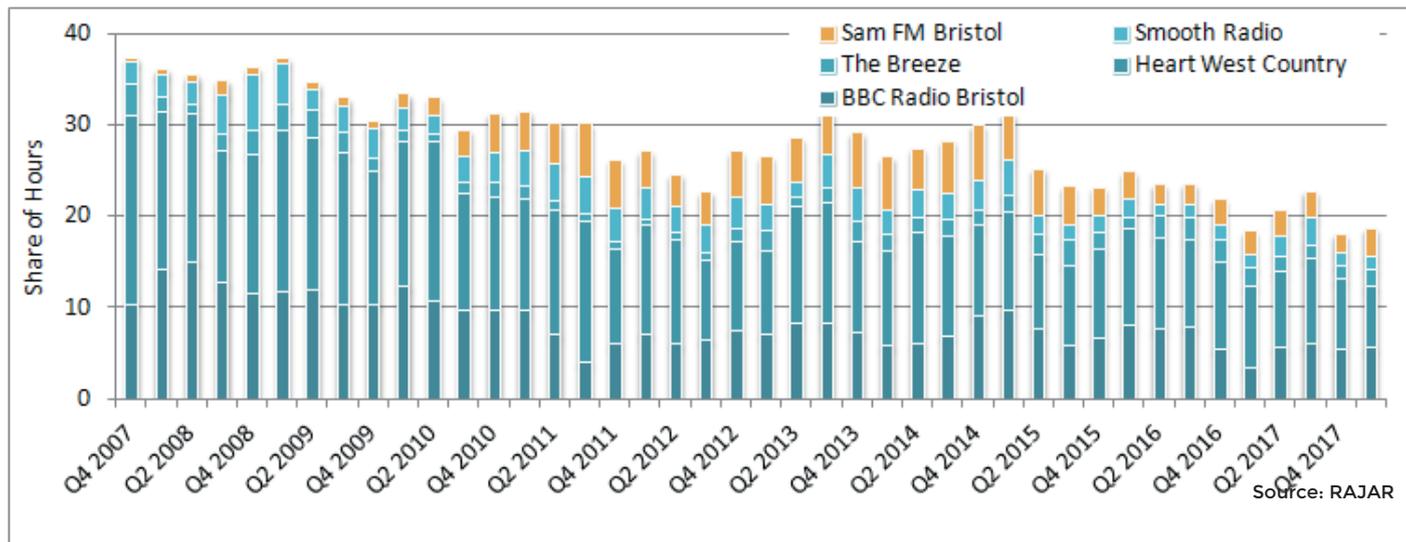


SAM FM's format is to target 35 to 59 year old males, yet in the last year this demographic has made up between just 11.8% and 27.0% of their audience.

Like many areas, local radio share has been under threat, particularly from the growth of digital stations. Bristol itself is a market that has consistently had one of the highest digital shares of listening of any market in the UK. Over the course of the licence the share of BBC Radio Bristol and the local stations have nearly halved from 37.3% to 18.6%.



In the Jack FM years, the station delivered 4 to 6 of share points, SAM FM now contributes half of that. For local radio to reclaim audience against the new digital broadcasters it is essential to deliver easily understood branded radio stations, with high quality and cleverly delivered local content. Jack FM has proved its ability to deliver it before and is ready to do it again.



The total number of radio stations broadcasting within this market is now over 50, up from 39 in 2008 and reflecting the various changes in market competition over the past ten years. Our detailed market analysis suggests a weakness in listening amongst older adult listeners who do not have the access to two of the market's four local commercial radio services (Sam and Breeze) on the relevant local DAB multiplex, nor to a local AM older music service (Smooth).

All radio reach, which has consistently been on the 90%'s in recent years, has seen a fall in the past four quarters to 89.9%, albeit that this level is higher than the national average by some 4%, we note that all commercial and ILR perform below network average, in particular in relation to market share some 21% and 23% lower respectively, strongly indicating a lack of satisfaction with the content required to deliver higher hours of listening.

Another way of looking at the comparative strength of all commercial and all ILR in the market is to understand the ratio between reach and share. All commercial achieves a ratio of 57% compared with a network performance of 69%, whilst all ILR performs poorly with a ratio of 46% compared with the network average of 57% indicating the strong impact of national commercial services in the market combined with low traction of local service to offer something compelling to compete.

Heart's share has fallen from 16% in 2008 to 9.5% in 2018. The best performing commercial station in Bristol in the period reviewed has been Kiss, who have moved their reach from 12% to 19%, although we note that their market share has remained static indicating a fall in average hours.

Music Monitoring

Data tables have been submitted in confidence.

Key objectives of the research	To analyse, quantify and understand the music output of existing local commercial radio services in Bristol and to establish the extent to which Jack FM would broaden listening To ensure that our proposals would broaden listening choice when and if we are successful.
Specific questions that research sought to answer	Analysis was conducted to determine the number of unique tracks played by each station, to determine the era/decade mix of songs and the level of overlap of tracks played. Also to understand the existing music genres in the market. A second study was undertaken to determine if Heart had changed its music policy
How research was conducted	Data was derived from Radiomonitor and collated and analysed by Nation Broadcasting's programming management team.
Size and composition of the sample	Music output data for Heart, The Breeze, Kiss and SAM FM was gathered over a seven day period across 24 hours.
When and where research was conducted	11th - 17th June 2018

Summary of Findings

The Bristol market is considerably weighted to contemporary and recent eras and is one of the few markets in the UK without an analogue oldies music service. Not surprisingly, we found a majority (53%) of the total universe of songs played on existing commercial radio stations are from 2000 onwards. Just 32% of songs are from the 1980s and 1990s – the core decades on Jack FM. Indeed, these decades will account for 60% of our total music universe.

Our median musical year, 1987 is significantly older than Heart (2009) and Kiss (2015). We are not as old as The Breeze (1984). Just 14% of tracks from Jack are recent, making us less contemporary than any other station in the market.

Jack FM's further distinction is revealed in its known classic rock and pop rock character. Thus provides contrast against Breeze's easy and Kiss and Heart's pop, chart and urban playlists. Elsewhere, the community stations provide specialist music for Bristol's various ethnic and minority communities.

The tables below records the era of all songs played across a week of commercial stations in the Bristol market and we have included Jack FM for comparison.

	Total No. Tracks	No. Unique Tracks	10s - Now	00s	90s	80s	70s	60s	Median Year
Breeze	2027	734	53	81	105	270	154	71	1984
Heart	2305	308	153	76	77	2	0	0	2009
Kiss	2841	444	333	86	25	0	0	0	2015
Jack FM	2089	852	30	91	118	396	196	21	1987

No. Tracks in Common	Breeze	Heart	Kiss	Jack FM
Breeze		22	5	132
Heart	22		129	37
Kiss	5	129		11
Jack FM	132	37	11	

Content Monitoring

Full data tables have been submitted in confidence.

Key objectives of the research	To analyse, quantify and understand the news, information and local speech content of existing local commercial radio services in Bristol and to establish the extent to which Jack FM would broaden listening.
Specific questions that research sought to answer	See above
How research was conducted	Data derived from Radio Monitor; collated and analysed by Nation Broadcasting programme management.
Size and composition of the sample	Speech content from Heart, The Breeze, Kiss and SAM FM (between 06.00 and 19.00) was monitored over a 7 day period.
When and where research was conducted	11th - 17th June 2018

Summary of Findings

In line with our research findings, we found our target audience are interested in local news, weather, traffic news, local sport and local “what’s on”.

We monitored and analysed the speech output of the commercial services. Kiss provides no local content. Jack FM will include a minimum of three Bristol stories in every news bulletin. We will exceed the Bristol news content of Heart and Breeze who have just one or two Bristol stories in each bulletin. News bulletins were half hourly in peak time and hourly during the day.

Additional findings have been submitted in confidence.

Original Market Research

Full data tables have been submitted in confidence.

Original market research was essential to review current listening behaviour, why listeners did not listen to existing services and to determine the programming elements they most demanded on a new local radio station.

<p>Key objectives of the research</p>	<p>To gain an understanding of local opinions, listening behaviour and preferences in Bristol. To discover the extent to which listeners are satisfied with existing services. To discover the extent that Jack FM might better serve local tastes and interests. To understand the likely audience of a new station for Bristol</p>
<p>Specific questions that research sought to answer</p>	<p>Local station awareness and frequency of listening. Current listening Reasons for not listening to named local radio stations Platforms used to access radio stations Importance of features for a new local radio stations Propensity to listen to a new local radio station Impact of new local radio station on current radio listening patterns</p>
<p>How research was conducted</p>	<p>Quantitative research conducted by research company CLG Market Research UK using fully trained interviewers operating under the MRS code of conduct. All data collected in face to face street interviews across the proposed Jack FM TSA to provide a representative sample of the population.</p>
<p>Size and composition of the sample</p>	<p>419 interviews with adults 15+. Quotas were applied to control demographics, gender and status based on the known profile of the proposed licence area. We conducted 419 face to face in street interviews amongst the target population living in 25 sampling points representative of the area. This provides a sample that has significance to +/- 5%.</p>
<p>When and where research was conducted</p>	<p>Survey conducted between 13th November and the 5th December 2017. Sampling points and sample size, detailed below, were selected to be representative of the licence area with interviews controlled by day of week to ensure a broad spread of listening behaviour.</p>

Summary Of Key Findings

Audience

Heart is the most listened to commercial station (34%), followed by Kiss (31%). The Breeze has 11% weekly reach. SAM FM is the worst performing local station, with just 10% overall listening and only 6% in its core market of men aged 35-54. The highest number of any station (68%) had never listened to SAM FM. However, they had the highest number of people who used to listen and no longer did (17%) and just 3% of respondents said SAM FM was their favourite station.

	Commercial Radio Stations in Bristol				
	BBC Radio Bristol	Heart Bristol	Kiss	SAM FM	The Breeze
I have never listened to this station	42%	32%	45%	68%	65%
I used to listen but don't anymore	20%	16%	15%	17%	16%
I listen occasionally, at least monthly	16%	17%	9%	4%	7%
I listen regularly, at least weekly	22%	34%	31%	10%	11%

The overall most popular station in the market is BBC Radio 2 (37%). The BBC performs well in Bristol with BBC Radio 1 (25%), BBC Bristol (22%) and Radio 4 (17%) having significant numbers of weekly listeners. We note that BBC Radio 2's audience is strongest in the 35+ age range, suggesting there is both the opportunity and available scale to gain a sizeable audience from this demographic. This is confirmed when considering a massive 44% of male respondents aged 35-54 said they would change their listening behaviour to accommodate Jack FM and stop listening to BBC Radio 2, with 21% listening less. These findings confirm our confidence in our prospects for a second spell of success in this market.

Having identified via RAJAR and our fieldwork that a target audience of men aged 35+ is the least served and most viable local audience in Bristol, we looked at this audience's demands and interests in more detail in our own fieldwork. We centred our analysis on the core 35-54 male audience since we know that this is where Jack FM previously performed strongest in Bristol.

Music

A very large majority - 73% of males 35-54 - thought a broad variety of music was important on a new station. In terms of specific decades, 59% of this audience thought music from both the 1980s and 1990 was very/quite important. The 2000s were slightly less popular at 50%, with recent and current hits at 61%. The 1970s (42%) and 1960s (38%) were noticeably less important. Given we can see a demand for music variety and also for a broad era spread, centred on the 1980s and 1990s, we know that Jack FM can deliver these characteristics.

Furthermore, in terms of genre, a classic rock/pop rock mix is clearly distinctive and will, we know, be popular given Jack FM's past RAJAR success. We noted that 42% of all respondents 35-54, and 35% of our core male target, cited they did not listen to SAM FM as they did not like its music. 37% of core respondents said they did not listen to SAM FM as it failed to cater for their tastes and interests.

Speech & Content

We noted that 55% of our 35-54 core target audience thought Bristol news was important. Local Bristol news performed much more strongly than national news and we have noted this and provided for it with enhanced and extended provision of local news on Jack FM between 0600 and 1900, seven days a week.

Our audience wants relevant local Bristol information - weather and traffic information - which were thought very/quite important by 78% and 67% respectively. We will provide over 100 live and updated local news, weather and travel bulletins seven days a week. A majority of our core male 35-54 audience - 53% - thought local sports news was important and we will reflect this demand in our overall speech output and general news and information provision.

55% of 35-54s wanted "what's ons" and we will provide for that with our famous jack-tivities. 58% thought it important to have "presenters that know and understand the local area" and, with our presenters being Bristol based, we will provide for this demand, with our team being available and accessible to support local community initiatives and our commercial team's sponsorship and sales activities.

The research highlighted that just over three quarters, 77% of our core target population and 81% of all 35-54s would be definitely/very/quite likely to listen to a new local station for Bristol centring on music variety. A third would definitely or be very likely to listen. The results also underpinned that this service would be highly likely to attract strong listening loyalty with higher than expected average hours of listening planned. The findings also highlighted that a new service would primarily serve to increase the amount of time they spend listening to the radio, a finding which is encouraging given commercial radio and ILR's below average performance in the Bristol market.

Radio research universally shows music to be a determining factor in radio station choice and our research revealed a preference for music variety, with 74% thought it important to have a broad variety of music. Consequently, we will play more unique songs - 850 every week - than any other station.

Our commitment to 21 hours a day of local programmes is based on what we already provide over the Severn Bridge at Nation Radio. We believe local content is a competitive advantage; just because you are permitted to produce just 7 hours a day of local programming doesn't mean you are prohibited from being more ambitious.

Platform/DAB

A considerable majority - 55% - thought it very/quite important that the new service is available on DAB digital radio. Jack FM's market research showed that 35% of all respondents, 40% of 35-44, 42% of 45-54 and 44 % of 55-64s now listen on DAB digital radio, a broadcast platform SAM FM has ignored. It is clear that the propensity to listen to DAB is weighted to older listeners aged 35+ and we see this as a significant opportunity within our main audience target demographics.

All local services scored below the national average for listening in the home and, without exception, above average for listening at work. This was particularly true of SAM FM which is not available on DAB, thus reducing its accessibility and commercial opportunity in Bristol.

Only 78% of all respondents and just 69% of our core male 35-54 audience listen to AM/FM radio. Our core also listened on mobile/tablets (16%) and, at 3%, was the strongest demographic for listening on smart speakers. These numbers demonstrate that listening behaviour has changed irrevocably and that stations must invest on availability on all platforms if they are to build a viable audience.

7. Evidence of Support

Summarise (in no more than 500 words) any evidence of support for your application from your potential (or existing) audience or from prospective local advertisers.

Jack FM has discussed its plans with a number of Bristol agencies and regional advertisers and their positive responses is indicative of the strong support we have generated for our proposals. It is clear that Jack FM will be welcomed by former listeners and clients, who loved the station.

“We have several group businesses operating in Bristol and I’d be keen to discuss options to emulate the success we’ve achieved with Nation Radio... we attract a decent number of customers from over the bridge and I very much expect this to increase as the Severn Bridge tolls drop.”

- Mark Pardoe, Managing Director, Griffin Mill

“We have an excellent relationship with Nation Broadcasting which has developed over many years and are excited to hear about their plans to bid to operate a licence in Bristol. We support their efforts to extend their coverage into this region.”

- Jac Bowen, Marketing Manager, Trade Centre Wales

“It’s clear after hearing your plans and discussing them with you over a number of months that your proposed radio station for the city will offer Bristol a local radio service which currently isn’t on offer.”

- Chris James, Group Head of News & Production, Made TV

“The SWNS Media Group supports a diverse and independent local broadcast media, and welcomes more choice for the people of Bristol.”

- Paul Waters, Group Managing Director, SWNS Media Group

“As a media agency representing many local and regional clients, Jack FM will fill a part of the broadcast market that is distinct from the incumbent station. Nation Broadcasting’s investment in broadcasting regular news, weather, travel and events information will resonate with listeners and give more choice for advertisers”

- Jim Carpenter, Business Development Director, Orchard Media

“We will be looking at opening new stores in Bristol so this is great news”.

- Clayton Perrett, Director, Discount Pram Centre

“We advertise on a number of Nation Broadcasting’s stations including Nation Radio and I feel that expanding into Bristol will be beneficial to residents and businesses alike. I look forward to expanding our business through your listeners.”

- Paul Davies, General Manager, Day’s Motor Group

Declaration

Applicants are required to conclude their submission by responding to the following question:

Do you confirm that, to the best of your knowledge and belief:

- a) the applicant is not a disqualified person in relation to the licence by virtue of the provisions of section 143(5) of the Broadcasting Act 1996 (relating to political objects);
- b) no director or person concerned directly or indirectly in the management of the company or the applicant group is the subject of a disqualification order as defined by section 145(1) of the Broadcasting Act 1996;
- c) no person involved in the application has been convicted within the past five years of an unlicensed broadcasting offence and that the applicant will do all it can to ensure that no person so convicted will be concerned in the provision of the service, the making of programmes included in it, or the operation of a radio station if the applicant is granted a licence; and
- d) any matters which might influence Ofcom's judgement as to whether the directors and substantial shareholders involved in the application are fit and proper persons to participate in a radio licence have been made known to Ofcom?

Applicants should note that Ofcom reserves the right to revoke a licence if at any time any material statement made is found to be false and to have been made by the applicant or any member or officer thereof knowing it to be false, and that in the circumstances of section 144 of the Broadcasting Act 1996, the provision of false information or the withholding of relevant information with the intention of misleading Ofcom could incur a criminal conviction and a disqualification from the holding of a licence.

Bristol Sound Limited confirms there are no issues with regards to the above matters that need to be brought to Ofcom's attention.



Jason Bryant
Executive Chairman

FILE COPY



**CERTIFICATE OF INCORPORATION
ON CHANGE OF NAME**

Company No. 5388776

The Registrar of Companies for England and Wales hereby certifies that
RADIO SHREWSBURY LIMITED

having by special resolution changed its name, is now incorporated
under the name of
BRISTOL SOUND LIMITED

Given at Companies House, Cardiff, the 16th May 2006



C05388776F



THE OFFICIAL SEAL OF THE
REGISTRAR OF COMPANIES



Companies House
— for the record —