



**An application for the Ipswich FM licence by
MuxCo Suffolk Radio Ltd**

January 2018

Public Document



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Part B – Financial and Business Plan

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Executive Summary

Ipswich FM – a strong service for the future of Ipswich local radio

Since the Ipswich 102 FM frequency was first awarded in 2005, UK radio has changed immeasurably. Changes in how listeners consume radio and media, and the opportunities that changes in regulation have given radio operators, have all contributed to how local radio is made and listened to.

Relaxation in localness rules has allowed radio groups to change how stations are run, allowing the underlying businesses to develop using shared resources or to combine smaller radio stations into larger regional services. The viability of stand-alone radio stations can sometimes be difficult to argue, and the financial underpinning that radio groups can provide can be significant. But one thing is clear from our review of the Ipswich market, there is a gap for a local Ipswich radio service which provides a strong local identity and content which caters for the broad tastes and interests of this significant community.

Ipswich FM's viability is of primary importance to MuxCo Suffolk which is why we have developed a model with two strong pillars: the support of two successful local radio groups in Nation Broadcasting and Lincs FM, whilst ensuring the new station is at the centre of radio's broadcast future on our Suffolk DAB digital radio multiplex.

As our research shows, a significant majority of Ipswich residents think being on DAB is of vital importance. RAJAR analysis also highlighted that the incumbent's lack of DAB as a broadcast platform has halted its growth and seen it decline. Its lack of investment in DAB is the very reason this licence contest is open.

We are applying for an FM licence as we see FM as a bridge to a digital future. The continuing strong reach of FM, allied with good DAB distribution, will allow us to provide an attractive audience for our commercial clients. The heritage we will build over the FM licence term will allow an Ipswich-focused station to become a successful digital-only commercial station, cementing it as part of the local community and radio landscape after analogue switch-off.

Our shareholders Nation Broadcasting and Lincs FM have already demonstrated this model. Their radio stations remain separately branded and locally focussed, and deliver commercial success whilst building their future with digital radio on multiplexes they own or co-own. Our plans for Ipswich FM build on this successful model which proves that traditional local radio is alive and well.

Listeners have never had more radio stations on their analogue and digital dials. Radio's continuing success, we believe, has come from different types of operators – slick nationally branded commercial stations like Heart and Smooth, strong local content from the BBC and heritage independent stations, new digital services like Kisstory, Chris Country and Fun Kids, and volunteer-run community radio.

With Ipswich FM, we will add to that diversity with a locally branded and locally delivered radio station built for the digital future and supported by successful local radio groups and the local digital multiplex.

What our research and discussions with the local community has highlighted is that what Ipswich desires is a local radio station that champions local causes and is seen to be part of the community.

And that's the bedrock of our proposal. Ipswich radio, for Ipswich, from Ipswich.



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.

MUXCO SUFFOLK RADIO LIMITED

**Greenworks
Dog and Duck Yard
Princeton Street
London WC1R 4BH**

**020 7739 7979
suffolk@muxco.com**

(b) Main Contact (For Public Purposes)

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

Name: **MICHAEL BETTON**
Telephone (daytime): **01522 549900**
Address: **Muxco Suffolk, Greenworks, Dog and Duck Yard, Princeton Street,
London WC1R 4BH**
E-mail address: **suffolk@muxco.com**

(c) Station Name (if decided)

IPSWICH FM

(d) Main Contact (For Ofcom Purposes)

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

Name: **MICHAEL BETTON**
Telephone (daytime): **01522 549900**
Address: **Muxco Suffolk, Greenworks, Dog and Duck Yard, Princeton Street,
London WC1R 4BH**
E-mail address: **suffolk@muxco.com**



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.

MICHAEL BETTON

Occupation: Chief Executive, Lincs FM Group

Other directorships: Lincs FM Group Ltd, Compass FM Ltd, Compass Radio Ltd, Dearne FM Ltd, Jet FM Ltd, Jupiter Radio Ltd, Lincs FM 102.2 Ltd, Planet Broadcasting Company Ltd, RadioCentre Ltd, Ridings FM Ltd, Rother FM Ltd, Rutland Radio Ltd, Suffolk First Ltd, Trax FM Ltd, White Rose Radio Ltd, MuxCo Lincolnshire Ltd, MuxCo Suffolk Ltd

Other Media Interests: None

JASON BRYANT

Occupation: Executive Chairman, Nation Broadcasting

Other 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

Other Media Interests: None

GREGORY WATSON

Occupation: Managing Director, Folder Media, MuxCo and Children's Radio UK

Other directorships: Folder & Co Ltd, Folder Media Ltd, MuxCo Ltd, MuxCo North Yorkshire Ltd, MuxCo North East Wales & West Cheshire Ltd, MuxCo South Midlands Ltd, Triple MuxCo Somerset Ltd, MuxCo Surrey & North Sussex Ltd, MuxCo Lincolnshire Ltd, MuxCo Suffolk Ltd, Children's Radio UK Ltd, Children's Radio UK (London) Ltd, Upload Radio Ltd, Inspiring Audio Ltd, Hallett Arendt Marketing and Research Ltd

Other Media Interests: None

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.

There are no plans to appoint further directors.

(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, nonvoting, 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.
- vii) 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.

MuxCo Suffolk Radio Ltd is a wholly owned subsidiary of MuxCo Suffolk Ltd, the licensee of the Suffolk DAB multiplex. There are 100 ordinary £1 shares issued in MuxCo Suffolk Radio Ltd to MuxCo Suffolk Ltd.

The shareholders in MuxCo Suffolk Ltd are:

Shareholder	£1 ordinary shares issued at par	% Shareholding	% Loan stock
Lincs FM Group Ltd Witham Park Waterside South Lincoln LN5 7JN	100	33.33%	33.33%
Nation Broadcasting Ltd St Hilary Transmitter, St Hilary Cowbridge CF71 7DP	100	33.33%	33.33%
MuxCo Ltd Greenworks, Dog and Duck Yard, Princeton Street, London WC1R 4BH	100	33.33%	33.33%
	300	100.00%	100.00%

Ofcom holds the details of the broadcasting interests and shareholding structure of MuxCo Suffolk Ltd, Lincs FM Group Ltd, Nation Broadcasting Ltd and MuxCo Ltd.

A shareholder agreement covers key issues of governance relating to the company including shareholdings, board composition, funding, pre-emption and confidentiality.

Our confidential Part B contains further financial information including confirmation of funding ability.

(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;

None

ii) Newspapers;

None

iii) Other broadcasting interests;

Lincs FM Group Ltd

- Lincs FM 102.2 Ltd (100%)
- Compass Radio Ltd (100%)
- Dearne FM Ltd (100%)
- Planet Broadcasting Company Limited (KCFM) (100%)
- MuxCo Suffolk Ltd (33%)
- Rother FM Ltd (100%)
- Rutland Radio Ltd (100%)
- Trax FM Ltd (100%)
- Ridings FM Ltd (100%)
- MuxCo Lincolnshire Ltd (51%)

Nation Broadcasting Ltd

- Swansea Bay Radio Ltd (100%)
- Radio Carmarthenshire Ltd (100%)
- Nation Radio Ltd (100%)
- MuxCo North East Wales and West Cheshire Ltd (33%)
- MuxCo North Wales Ltd (100%)
- Country Broadcasting Ltd (75%)
- Dragon Radio Ltd (100%)
- Haven FM (Pembrokeshire) Ltd (100%)
- Bridge FM Radio Ltd (100%)
- Radio Ceredigion Ltd (100%)
- MuxCo Wales Ltd (100%)
- MuxCo Suffolk Ltd (33%)
- Thames Radio Ltd (100%)

MuxCo Ltd

- MuxCo North East Wales and West Cheshire Ltd (33%)
- MuxCo Surrey & North Sussex Ltd (50%)
- Triple Muxco Somerset Ltd (33.3%)
- MuxCo Suffolk Ltd (33%)
- MuxCo South Midlands Ltd (58%)
- MuxCo North Yorkshire Ltd (50%)
- MuxCo Lincolnshire Ltd (49%)

iv) Bodies whose objects are wholly or mainly of a religious nature;

None

v) Bodies whose objects are wholly or mainly of a political nature;

None

vi) Local authorities;

None

vii) Other publicly-funded bodies.

None

* 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.



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.

Our business strategy is to:

- Provide a market leading, locally focused radio station for Ipswich.
- Ensure locally relevant content is available long term on the Suffolk DAB multiplex
- Help provide other services with local content in a post analogue market.

Until last year, Ipswich had enjoyed locally-produced commercial radio programming every day since commercial radio launched in 1975. That ended when the incumbent relocated to Norwich. With our track record, market knowledge and analysis of the revenue and audience history of this licence, and of commercial radio in Ipswich, we – and key local stakeholders – know that Suffolk's county town is more than able to support a vibrant, locally based radio service.

Our confidence in establishing Ipswich FM is based on the strong performance of our existing Suffolk business and our shareholders' impressive records of launching and operating successful Ofcom licences, against brands like Heart, Kiss and Smooth - the very competitors we face in Ipswich. Our shareholders' have a track record of stable ownership, innovation and profitability, from which we have the resource, experience and commitment to Suffolk to make a success of this licence.

MuxCo Suffolk is already an established part of the Ipswich broadcast ecology. We have a long-term commitment to Suffolk with our DAB multiplex licence running to 2030. As we approach FM switchover, we are aware of the Government's desire, post-switchover, for multiplex operators to ensure local content is delivered on the DAB platform to local listeners. In Ipswich, this provides a challenge and opportunity.

Across its network, MuxCo has partnered with local broadcasters to jointly own and operate each DAB multiplex. As we approach switchover we are confident that we can work with our partners, alongside third-party providers of local digital radio stations, to ensure local content continues to be available.

In Ipswich, the incumbent has moved production of its content outside of the county, and its parent company has shown little desire to broadcast on DAB. Heart and Smooth, Global Radio's national brands, broadcast limited local and county news. The lack of Ipswich focused commercial speech content providers is a problem now and post-switchover. We think the re-advertisement of the Ipswich licence turns that into an opportunity.

Through Ipswich FM, we can build a local content resource as well as broadcasting an Ipswich relevant radio station on FM and DAB. The FM opportunity, alongside DAB, will generate the necessary scale of audience that can generate robust local commercial revenues.

MuxCo Suffolk's shareholders are experienced operators of local radio stations and successful, innovative digital businesses. Lincs FM and Nation Broadcasting operate successful local radio stations in their respective areas, and MuxCo management has developed the innovative cross-platform service Fun Kids and the unique digital radio platform Upload Radio.

Ipswich FM is a complementary and important development opportunity for MuxCo Suffolk.



(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 the required funding will be in the form of an interest-free loan from the MuxCo Suffolk shareholders.

Further information has been submitted in Confidential Part B.

(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-radiobroadcast-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.

We have submitted our financial projections and their underlying assumptions in Confidential Part B.

(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+ population is 291,000. This figure is consistent with the current TSA claimed by Town 102 and that used for RAJAR.

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;

	Year 1	Year 2	Year 3
Marketing TSA adult population	291,000	291,000	291,000
Weekly Reach - %	15.0%	17.0%	19.0%
Weekly Reach	43,650	49,470	55,290
Average Hours	8.0	8.4	8.7
Total Weekly Listening Hours	349,200	415,548	481,023

The likely demographic profile in year one is estimated as follows:

	Population Profile	Audience Profile	Index on Population
Male	49.3	48.5	98
Female	50.7	51.5	102
16-24	12.6	4.7	37
25-34	13.9	10.7	77
35-44	14.3	17.4	122
45-54	17.4	25.5	147
55-64	15.5	18.5	119
65+	26.2	23.2	88
ABC1	61.9	50.0	81
C2DE	38.1	50.0	131

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

We expect our audience to comprise listeners to the current Town 102 service and listeners who currently listen to a broad range of existing commercial and BBC services. We do not believe they will exclusively come from any single station.

We also expect Ipswich FM to have a largely positive impact for radio as a whole. 44% of those interested in listening and 56% of those most likely to listen said they would spend more time listening to radio in order to incorporate Ipswich FM in their repertoire. This underpins a desire for a more locally based service.

27% would listen less to one or more stations, although amongst those most likely to listen this was 20%. BBC Radio Suffolk was by far the most impacted with 26% naming this service, followed by BBC Radio 2 (15%) and Heart (11%).

Just 5% would stop listening to a station in their current repertoire, and those stations most likely to be negatively impacted being Kiss, BBC Radio 2 and Heart.

Furthermore, and a testament to our broad mix of music, 18% said they would spend less time listening to their own music. Another indication of dissatisfaction with the music heard on Town 102.



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 we will achieve 15% reach in year 1, rising to 19% in year 3.

Whilst this is significantly ahead of Town 102's current performance, when that station was a true local radio station, serving the town from the town, it achieved reach of over 20% for four consecutive years from 2011. Our projections take account of today's more competitive environment for listeners and also reflect the clear appeal of a local station for Ipswich, based in and programmed exclusively for the town.

Our proposals are based on our audience research findings, and we are confident that by delivering what the local population wishes, we can significantly improve on Town 102's performance and become the market leading service in Ipswich:

- Strong appeal for our proposed mix of music in our research.
- Strong appeal for Ipswich-led speech content in our research.
- Editorial focus on Ipswich and South Suffolk – from Ipswich, for Ipswich.
- Commitment to DAB. (Town 102's failure to make itself available on the Suffolk multiplex has disenfranchised its listeners).
- Significant marketing campaign to build awareness of and engagement with Ipswich FM.
- Our core 35+ audience makes it easier to target and market Ipswich FM.

Despite all radio reach remaining strong in the Ipswich market, the trend towards brands and 'regionalised' services by local commercial radio, with no local services now being produced in Ipswich, has resulted in a decline in local commercial market share over the last decade, from a peak of 29.1% in 2009 to its lowest level, currently at 20%. 55% of the population currently do not include any local commercial service in their repertoire.

To succeed, we believe that Ipswich FM must please as many people as possible for some of the time, rather than seek to super serve a niche within the market. In saying this, we note that the population profile in Ipswich is largely 35+ (73.41% of the adult population).

Our strategy is to target a core audience aged 35+ but knowing that we will also reach listeners under 35. Whilst our broad mix of music will interest all age groups, it will be our commitment to local news and information that will ensure substantially higher reach and audience loyalty amongst the 35+ age groups. We anticipate reaching more people aged 35+ than Town 102 currently achieves in total, and with significantly higher average hours.



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

We calculated our audience projections and profile based on our audience research, where 24% claimed they would 'definitely' or 'very likely' listen weekly to a local station with broad music choice and local news and information, rising to 48% adding in those 'quite likely'.

We believe that this high score reflects the reasons why people do not regularly listen to Town 102, where 51% said it was because they "do not like the music they play" and a high 19% saying they "couldn't get the station" (perhaps reflecting that the station is not available through DAB).

To calculate reach, we applied a weighting to represent the likely conversion based on our anticipated appeal by age. Using as our benchmark those at least 'quite likely' to listen, we anticipate converting 20% of 16-24s, 30% of 25-34s, 60% of 35-44s and 45-54s and 50% of 55-64s and finally 45% of 65+. This generates a conservative potential audience of 22%. For the purpose of modelling, we have assumed reach of 15% in year 1, rising to 19% by year 3 in our revenue calculations.

To calculate average hours, our audience research asked respondents to estimate how many minutes per day they would spend listening to a new local station. The average per day, based on the profile of those 'at least quite likely' to listen, was 1 hour 44 minutes. This generates a weekly potential of 12.13 hours per week, which is a long term but achievable target. Again, for the purpose of modelling, we have assumed 8.0 hours in year 1 rising to 8.7 by year 3 in our revenue calculations.



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.

We will contract with Arqiva for a Total Broadcast Contract to manage the transmission of the service. We have seen the Reference Offer published by Arqiva on 3rd November 2017. MuxCo Suffolk and the individual MuxCo Suffolk shareholders are existing clients of Arqiva and have good working arrangements, and expect to move quickly to contract in the event that our application is successful.

We will use the existing transmission site at Warren Heath:

- NGR: TM 196 425.
- Site is 34 metres above Ordnance datum.
- Radiated power is 2kW (1kW HP 1kW VP).

Antenna System

- The transmit antenna comprises 2 tiers of 1 off VHF Sira omni element antenna at 46.7m and 48.9m on a bearing of 290°.

Transmitter System

- Eddystone S79005 transmitter
- Output power is 530W - ERP 1.25kW (1kW VP and 250W HP)
- Telemetry provided by Dataminer
- Programme Input Equipment (PIE) – Audio codec with ISDN; Opus audio change-over system; MP3 player; Audio Processor – Orban 8500; FMB10 RDS Encoder
- Equipment Rack

Telco Circuits

Arqiva will provide or procure a studio to transmitter circuit from a notional location in Ipswich including back-up using ISDN.

A detailed computer predicted map (in colour) of the coverage anticipated using the transmission site and parameters described above.

Attached in Part B.

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 MuxCo Suffolk will be in a position to commence broadcasting its proposed service from the expiry date of the existing licence being re-advertised.



SECTION 105(B) AND (C): CATERING FOR TASTES AND INTERESTS/BROADENING CHOICE

4. Format

Service name

IPSWICH FM

Licence number	AL308
Licensed area	Ipswich
MCA population	154,993
Frequency	102.0 MHz

Character of Service

AN IPSWICH BASED, BROAD MUSIC SERVICE FOR A 35+ AUDIENCE, WITH A STRONG COMMITMENT TO IPSWICH NEWS AND LOCAL INFORMATION.	
Service duration	24 hours
Locally-made programming	Studio location: Locally-made programming must be produced within the licensed area. Locally-made hours: At least 13 hours a day during daytime weekdays (must include breakfast) and at least 7 hours daytime Saturdays and Sundays. Programme sharing: No arrangements.
Local news	At least hourly during daytime weekdays and peak-time weekends. At other times, UK-wide, nations and international news should feature.

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; New applicants should answer the following question:

The Ipswich FM programming philosophy is to be local, accessible and popular – offering a radio station in tune with the needs and demands of local listeners.

In shaping our proposals, we have considered financial viability and audience requirements. Ipswich FM will be part of a Suffolk media business, delivering local content for listeners. A successful Ipswich FM means local news and content both today and after a digital switchover.

To our knowledge, the incumbent did not carry out research when electing to move not just out of town but out of the county, and when choosing not to broadcast on DAB:

- A majority of respondents in our research stated that a local radio station should be based in Ipswich, with 68% feeling it important to have “presenters that know and understand the local area” and a high proportion also wanting to see presenters out and about in Ipswich. As the only local commercial radio station in Ipswich, our presenters will not only know the area, they will add visibility and profile to our station.
- 66% of respondents want their local station to be available on DAB. The incumbent has not invested in DAB – against the clear wishes of the local population.
- Our research confirms the decline of the incumbent – 19% of respondents did listen but now do not. With little marketing and no digital distribution, its ratings would be unlikely to increase.

RAJAR confirms that no station is currently the clear market leader, with Kiss and Heart catering for younger audiences. Ipswich FM will be a radio station for all age groups. Although music will be primarily for 35+, we know that where a station is firmly embedded in the local community with relevant local news and information, we will also achieve reach with under 35s.

No other station editorially focuses just on Ipswich – a clear market gap – and making our speech proposals central to this application:

- Our plans for a substantial news provision are supported by our research, with 73% stating local news to be very/quite important. As local press diminishes in influence, local radio has a key role for delivering local news.
- Our research found Suffolk county (72%) and East Anglian regional news (69%) important to overall appeal - we will include these in our bulletins.
- Weather (77%) and travel (76%) scored very highly and will be reflected throughout our programming.
- There was strong support for opportunities for local people to get their voices and opinions heard (51%). With programming all-local all-day, we will have the necessary programming environment and local presenter talent to offer interactive elements such as phone-ins and interviews with local people.

Music is a significant determinant of radio station choice and our research revealed strong interest (71%) in a broad variety of music. Ipswich FM will deliver this variety, with more songs from the 70s, 80s and 90s than any other station in the market.

Finally, our commitment to 13 hours a day of local programming is greater than the incumbent. Critically, in our case, local means local. We will be literally at the heart of Ipswich.



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.

Ipswich FM will broaden choice through its editorial focus, music variety, studio location and target audience, offering a clear local choice to Heart, Kiss and Smooth and community station ICR FM.

We reviewed the formats of existing commercial services and key commitments of ICR. Editorially, no commercial station serves just Ipswich, giving us our defining editorial characteristic. Smooth, Kiss and Heart serve substantially larger editorial areas, with only Heart offering any Ipswich news. Furthermore, we will be the only commercial station based in Ipswich, broadcasting 24/7 with no networked programming.

Our distinctiveness is clear from our formats and audience targets – Heart and Kiss target under 44s and under 30s respectively, while Smooth targets those aged 50+. Ipswich FM is the only station targeting a 35+ audience in Ipswich.

Our news and information will focus on Ipswich, with at least two Ipswich relevant stories in every bulletin, as well as additional wider Suffolk and East Anglian information. Monitoring has shown that Ipswich news and information is limited on existing services, with Smooth and Kiss providing none at all. Heart provides the occasional Ipswich story, although it was noticeable that on some days there were none. ICR has no news commitment. With over 120 bespoke local news bulletins each week, Ipswich FM will dramatically increase listeners' choice and provide a much-desired service.

Our traffic and weather will feature in a greater number of bulletins than any other station. With a minimum of two traffic and weather updates in peak time hours on weekdays and weekends, we will quickly gain a reputation as being the station for local information. We will supplement these with informal, non-scheduled updates - something that generic national and quasi national brands struggle to provide. With over 120 travel bulletins and weather updates every week, we will have more of this locally relevant and demanded information than any other station in the market.

Our music will be distinctive. Out of a playlist of 1,200 tracks, over 70% of our music will come from the 70s, 80s and 90s meaning Ipswich FM will broaden choice as the only broad based, classic hits station in the market. Kiss and Heart concentrate predominantly on contemporary and recent music eras, and Smooth is distinctive by its older, easy listening focus. Our median year of music is 1987) - again distinctive against Smooth (1984), Heart (2005) and Kiss (2015).

With double the number of unique tracks of any other station, we will deliver the broad variety of hits from across the decades that our research demanded. Our target listeners' musical tastes were defined in their youth – the 1970s, 1980s and 1990s – and our music will predominantly come from these decades. We are also distinctive by genre - Kiss plays dance/rhythmic songs, Heart is AC/CHR and Smooth is easy listening. Community station ICR caters for non-mainstream musical tastes such as jazz, blues, reggae, hip-hop, soul and rock.

Finally, our broadcast area makes us distinctive. We are centred on Ipswich. Editorially Heart (MCA 375,000) and Smooth (MCA 565,000) serve Bury St Edmunds and Ipswich, with Kiss (MCA 1.4m) serving a huge East of England region. Only we can focus on Ipswich and that means we will always be more local and more relevant.

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:

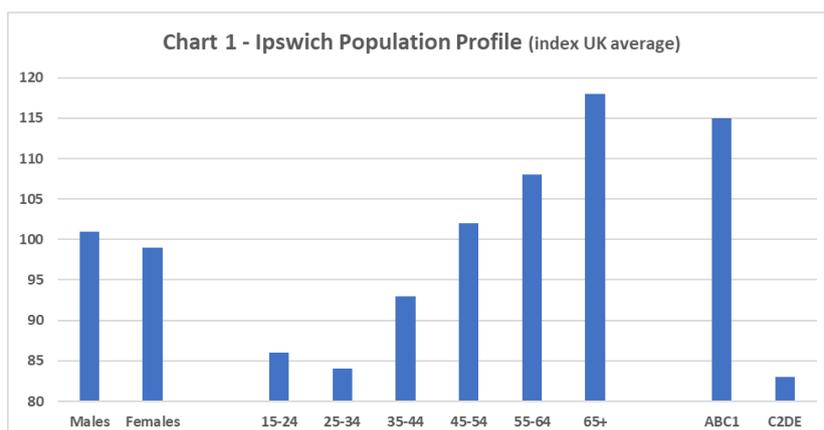
We have undertaken a comprehensive programme of research to fully understand the current radio market and the commercial opportunity for Ipswich FM:

1. Desk research of existing local radio choice and the Ipswich economy.
2. RAJAR analysis to understand current listening patterns and where commercial services are currently successful or not in providing for local tastes and interests.
3. Monitoring analysis to listen to the output that existing stations are currently producing and to determine how Ipswich FM might perform better in winning a larger audience than the incumbent.
4. Independent survey research to provide an understanding of local programming needs and audience projections.

DESK RESEARCH

a. Key objectives of the research	Establish population estimates, profiles and trends. Review Ipswich economy and Review current radio spend in Ipswich. Review formats of existing commercial services and key commitments of community radio.
b. Specific questions that research sought to answer	Understand current local commercial radio in Ipswich and possible format gaps. Understand the value of the Ipswich economy and its media market.
c. How research was conducted	Online / Offline. Various sources, Ofcom, Neilson, Ipswich Town Council.
d. Size and composition of the sample	Not applicable.
e. When and where research was conducted	October 2017.

Chart 1 summarises the population profile in Ipswich in Q3 2017, highlighting that Ipswich has a slight male bias compared to the UK, is older than the UK average with a significant population aged 55+, and is significantly ABC1.





We reviewed the formats of the four local commercial services broadcasting to Ipswich, and the key commitments of its single community service:

- Town 102 – Celador’s broad music, news and information service for listeners aged 25+ in Ipswich. Based in Norwich and broadcasting on FM only, with programming able to be shared between the Ipswich, Tendring, Norwich, Great Yarmouth & Lowestoft and North Norfolk licences.
- Heart East Anglia – Global’s mainstream popular music and information brand for under 44s. Based in Norwich and broadcasting on FM and DAB.
- Smooth Radio – Global’s easy listening brand targeting a 50+ audience with lifestyle-oriented speech.
- Kiss – Bauer’s contemporary and classic dance music station, primarily for under-30s.
- ICR FM – A community radio service for Ipswich, with programming including social action content, programmes in non-English languages and a wide variety of specialist music. The service provides original output for a minimum of 17 hours per day.

Ipswich is the county town of Suffolk and a major centre of population, economic activity and growth in the East of England. With a diverse and multicultural population, it is one of the fastest growing urban centres in the UK, with a thriving commercial and business sector and offering a wide cultural, sporting and retail provision. Ipswich Borough Council highlights Ipswich as *“An inspiring and exciting town perceived as both an attractive location for investment in business and a centre of excellence for education”*.

Ipswich Borough Council’s Local Plan (adopted February 2017) highlights that the Ipswich economy has coped comparatively well compared to the UK, and that the relatively high proportion of small and medium sized enterprises has allowed the local economy to be flexible in difficult trading conditions. The report highlights that out of the 325 authorities in England, Ipswich ranks 5th for ‘labour market’, 7th for ‘environment and infrastructure’, 8th for ‘business and enterprise’, 8th for ‘workforce growth’ and 10th for ‘quality of life’.

The Council’s vision is to improve the quality of life, health and well-being for all who live, work, learn and visit Ipswich, by supporting growth and ensuring that development happens in a sustainable manner so that the amenities enjoyed by local people are not harmed and the town is enhanced. As a result, by 2031 Ipswich will be a more vibrant, active and attractive modern county town, successfully combining modern development with conserving and enhancing its historic character - a true focus for Suffolk and beyond. It will be a place where people aspire to live, work, learn, visit and invest.

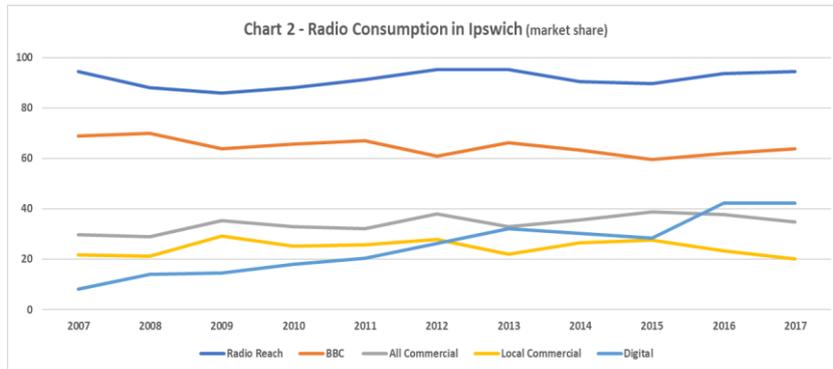
RAJAR ANALYSIS

a. Key objectives of the research	Provide trend data illustrating the historic performance of BBC and commercial radio services in the Ipswich TSA, including demographic analysis.
b. Specific questions that research sought to answer	Performance of Town 102, Heart, Smooth and Kiss as measured by audience reach, hours and demographics, measuring how audience reaction has changed over the last decade and how recent programming changes have impacted.
c. How research was conducted	Desk analysis of RAJAR between 2007 and 2017 using 12 month data to Q3 in each year within the Ipswich TSA.
d. Size and composition of the sample	Ipswich TSA
e. When and where research was conducted	Analysis undertaken by Hallett Arendt in November 2017.

Full data tables are submitted in Part C.

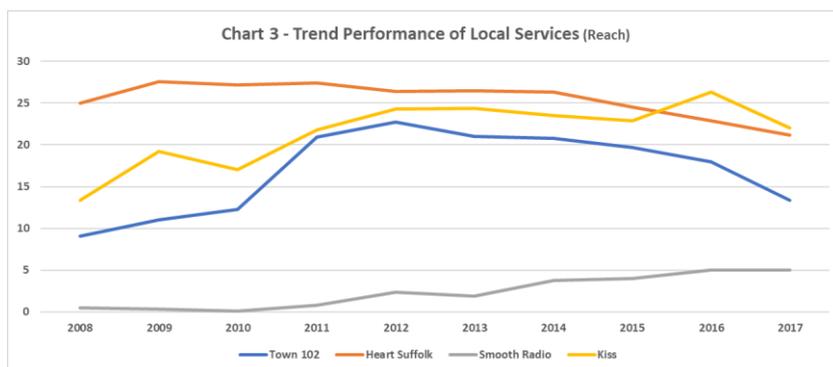
Summary of Findings

Chart 2 summarises radio consumption in Ipswich over the last decade, a period during which there was no significant change in the population and where the number of stations available within the market increased from 38 to a current 46, with a recent increase reflecting the launch of local DAB in October 2016. Whilst BBC National and Digital One national multiplexes cover the area, the Sound Digital multiplex currently does not.



- The popularity of radio remains high in Ipswich.
- Since 2012, commercial radio has consistently reached more than 60% of available listeners, demonstrating that increased choice via DAB has served to improve the sector's position.
- Commercial share performs behind the UK average and is currently 34.7%, suggesting that the sector is not providing enough compelling content to create higher station loyalty.
- Local commercial radio has come under competition with the growth of national brands and 'regionalisation'. Whilst weekly reach has seen some growth since 2010, it has dropped over the last two years and saw a dramatic 6.7% fall in 2017, with a corresponding fall in market share to just 20.0% (and lower than that in 2007).
- Digital Radio is now listened to by almost 60% of residents, with strong growth over the last two years – a period during which local DAB was launched.

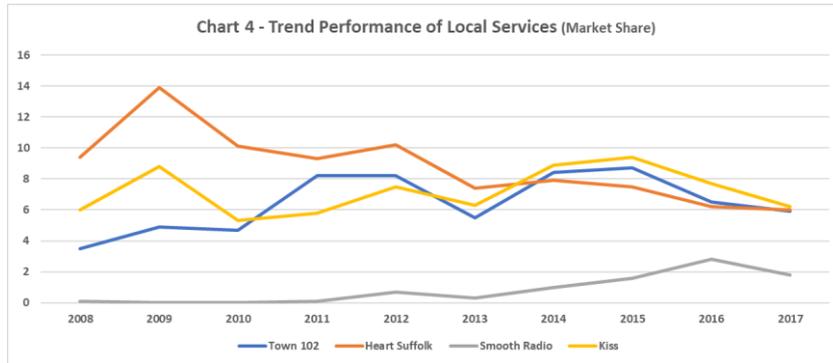
Chart 3 summarises the performance of local services in Ipswich per reach.



- Heart and Kiss are consistently the leading commercial services in Ipswich, as measured by reach, although Heart has experienced decline over the last 4 years, with Kiss currently achieving higher reach (and market share).
- Whilst Town 102 reported strong performance between 2011 and 2015, it has always trended lower than Heart and Kiss, and has been unable to take advantage of the significant falls in Heart's audience, highlighting issues in its programming and local focus. Town 102's performance over the last year has been particularly poor, with reach declining from 18.0% in Q3 2016 to 13.4% in Q3 2017.

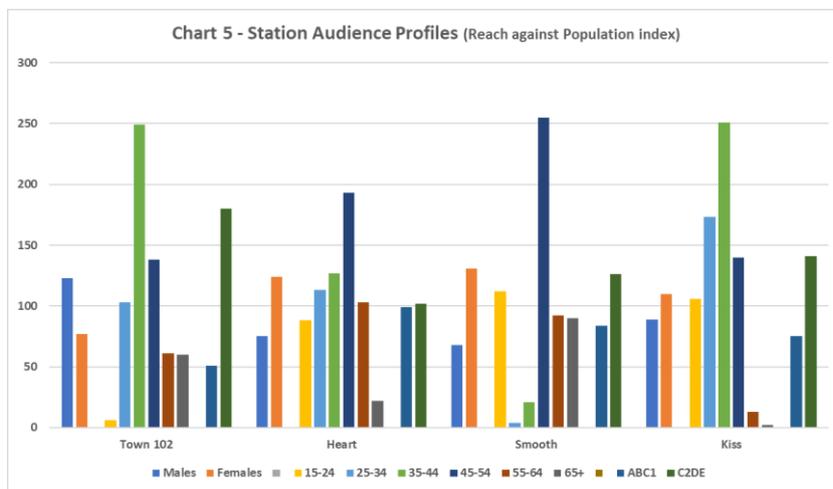
- Since its rebrand from Gold in 2014, Smooth has seen solid growth although it remains the poorest performing station in the market, perhaps reflecting the ‘national’ status of this brand.
- Kiss performs particularly well in the market, especially given that only 26.5% of the population is in the 15-34 age group. It has a broader than expected age appeal which underpins its strong overall performance, exceeding that of Heart in the past 2 years.

Chart 4 summarises the performance of local services in Ipswich per share.



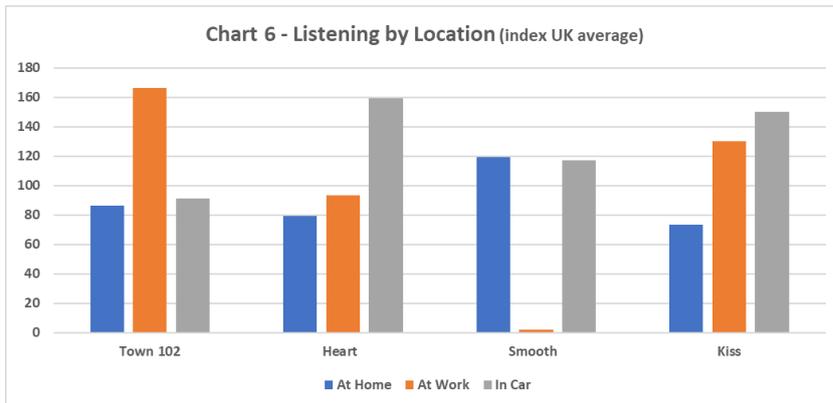
- Whilst Town 102 has seen a growth in average hours over the last year, the large fall in reach has resulted in its market share declining from 6.5% in Q3 2016 to 5.9% in Q3 2017.
- Kiss has broad appeal across the 15-54 age groups which underpins its strong overall performance in the past 4 years, with market share exceeding that of Heart.

Chart 5 summarises the audience profiles achieved by local services in Ipswich in Q3 2017 compared to the local population profile.



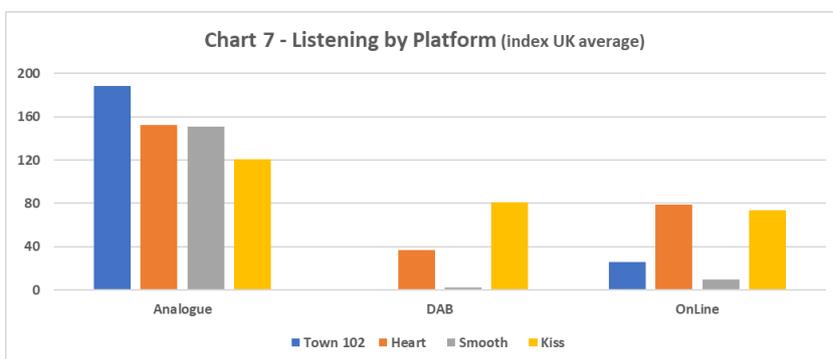
- In terms of reach, Town 102 has a female and C2DE bias. Whilst it achieves above average reach amongst 35-44s and 45-54s (delivering market shares of 13.5% and 8.0% respectively), Town 102 underperforms in the larger 54-65 and 65+ age groups.
- Despite the appearance of relative strength amongst 35-44s and 45-54s, Town 102’s overall audience levels are low. BBC Radio 2 is the dominant music-based radio service in the market and achieves over 35% more consumption in these age groups compared to the UK (indexing 135.5 and 153.6 respectively). In terms of hours, Town 102 has a male (with men delivering more than 60% of hours) and strong C2DE bias.
- RAJAR highlights that Town 102’s focus is limiting its potential for audience growth, and that to succeed a local service must broaden its age appeal.

Chart 6 summarises listening by location.



- In relation to listening at home, apart from Smooth, RAJAR reports that local commercial radio underperforms against the UK average. By comparison, Smooth, by dint of its older age profile, shows above average at home listening (73%) and lowest out of home listening.
- Town 102 and Kiss perform well in relation to listening at work
- The three services that also broadcast on DAB perform well in relation to listening in car, testament to drivers being able to listen for longer whilst driving, especially around commuting times.

Chart 7 summarises listening by platform.



- As expected, Town 102 listening indexes very high to analogue, with 98% of its listening through this platform and 2% online.
- Heart, Smooth and Kiss also index highly for analogue, reflecting that the local Suffolk DAB multiplex only launched in October 2016 (Kiss is available on DAB through the national Digital One).
- In respect of all radio, DAB listening in the TSA is strong, with 58.8% of the population listening through digital platforms and an overall digital share of 42%. Whilst slightly below UK average, this reflects that only BBC National and Digital One are available in the area, and the relatively recent launch of Suffolk DAB.

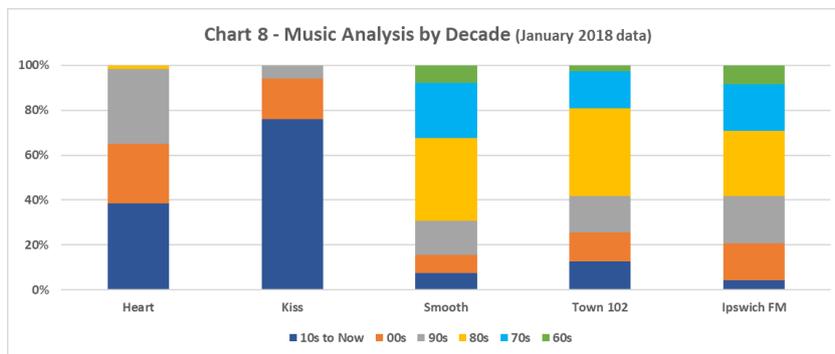
MUSIC MONITORING

a. Key objectives of the research	To analyse, quantify and understand the music output of local commercial services in Ipswich and to establish the extent to which Ipswich FM would broaden choice.
b. Specific questions that research sought to answer	The number of unique tracks played by each station. Determine the era/ decades that each station focuses on. How the proposed Ipswich FM mix of music would be distinct from other local commercial services.
c. How research was conducted	Data derived from Radiomonitor; collated and analysed by Paul Morris, and reviewed by Nation Broadcasting's programme management team.
d. Size and composition of the sample	The music logs of Town 102, Heart, Smooth and Kiss were reviewed. We re-ran the music analysis following a change to the Heart music policy in December.
e. When and where research was conducted	Music was analysed for each station between Monday 16 th and Sunday 22 nd October 2017 (00.00 to 24.00), and analysed again between Thursday 4 th and Wednesday 10 th January 2018.

Full data tables are submitted in Part C.

Summary of Findings

Chart 8 summarises the mix of music as broadcast in January 2018, with a comparison to the proposed Ipswich FM mix.



- Since our original music monitoring in October 2017, we noticed that Heart had dropped the 80s as a core music decade. We undertook a second monitoring to identify the impact of this change, which is to significantly shift the available music eras broadcast by Heart and Kiss younger. Kiss and Heart are now both very contemporary and recent in their music character. Smooth is older in its music output, with significant focus on the 70s and 80s, although it is more genre based, with all songs being easy listening.
- This leaves a considerable market gap and opportunity for an upbeat, classic hits music format, as proposed by Ipswich FM.
- The other stand out point from the music analysis is the limited playlists of existing services (Heart - 575 unique tracks, Kiss - 475, Smooth - 455 and Town 102 - 867).
- Ipswich FM will play more than twice the number of songs each week than Heart, Kiss and Smooth, and almost 50% more songs than the incumbent.

CONTENT MONITORING

a. Key objectives of the research	To quantify the news and information output of local commercial services serving Ipswich. To establish the extent to which Ipswich FM would extend listening choice.
b. Specific questions that research sought to answer	See above
c. How research was conducted	Audio collected from Radiomonitor and reviewed and analysed by Paul Morris.
d. Size and composition of the sample	Daytime news output (between 06.00 and 19.00) on Town 102, Heart Suffolk, Smooth and Kiss monitored over a 7 day period.
e. When and where research was conducted	Monday 16 th to Sunday 22 nd October 2017

Full data tables are submitted in Part C.

Summary of Findings

- Kiss generally has no local content and no local news. Smooth has no local news at all.
- Heart provide few Ipswich stories – generally its news is national and regional.
- On the incumbent’s service, we noticed significant repetition and little updating of news. We also noted a number of mistakes. It was noticeable that the same news, in the same order, was often heard. On 19th October at 0600 and 0630 there were no Ipswich or Suffolk stories, two Norfolk stories and two national / international stories. The following day at 0600 we had “Essex” stories as the first two items - nothing Suffolk or Ipswich related at all.
- Given the importance of local news, weather and travel in our research, we believe that a locally produced, locally monitored and managed service will perform considerably better and include far fewer mistakes.

In our monitoring of services, we also noted the following points:

Town 102

- As well as the above news mistakes, one morning we heard the previous evening’s travel bulletin being broadcast. We also heard commercials for a car dealership in Bristol and the station being identified as The Beach – its sister station in Great Yarmouth.
- Travel news appears to be a simple read from a centralised information point. It lacks the relatability of someone who knows the area. There is a lot of repetition and calling some roads by their numbers rather than the name that locals would describe it. From our experience, travel news comes into its own when on air presenters live in the area and know the towns and roads. They can reference places and landmarks when talking about travel news, which gives gravitas and authority.
- Hourly news is capped at a fixed length of 120 seconds. There were a couple of mistakes in the week we listened, with daily repetition of bulletins and content being recycled many times.
- The presentation style is wholly generic unless there’s a specific need to be local. Presenters bring little content to the table, and there is virtually no effort applied to localise it in any way.

We are also aware of general disquiet on social media amongst former Town 102 listeners following the changes to the station’s location and programming.

Heart

- Very slick and well produced sound, with presenters adopting a very up-tempo delivery with their content.
- During programming hours produced in Norwich, local references are limited to listener shouts “Sharon’s doing her nails ready for night out in Norwich with the girls later & would love to hear a bit of Rihanna” or occasional audience phone interaction during the breakfast show.
- Regional localism (at breakfast) is achieved in a benchmark feature called “Big Town Showdown” which is in essence a simple general knowledge/showbiz/music quiz, but with each contestant representing their home town or village... playing “for the pride of East Anglia”.
- Travel news is presenter read, and pan-regional at breakfast and drive with mentions of roads in Norfolk and Suffolk. The regular Drivetime host utilises the split link technology to deliver individual Suffolk and Norfolk bulletins – although the cover presenter heard during our monitoring period did not produce split bulletins. It was noted that on the day the A14 Orwell Bridge was closed (a massive travel problem for Ipswich) there was no mention in networked programming after 10am even though it was closed until early afternoon.
- News is a mixture of national and local stories – they are regional bulletins and not split for Norfolk or Suffolk. Several stories were heard with the phrase “across Norfolk and Suffolk” / “here in the East”. Key programme sponsorships appear to be sold to national clients, whereas programme features such as weather and travel are sold to local clients.

Kiss

- A slick and heavily produced sound.
- Output is entirely a simulcast of Kiss London, with local commercial breaks and a handful of regional travel news bulletins during breakfast and drive.
- News content is 100% national with no localisation in any bulletin.

LOCAL RESEARCH

a. Key objectives of the research	To gain an understanding of local opinions, behaviour and preferences in Ipswich. To discover the extent to which listeners are satisfied with existing services. To discover the extent that Ipswich FM's proposed format might better serve local tastes and interests.
b. Specific questions that research sought to answer	What local stations respondents are aware of and frequency of listening. Reasons for not listening to named local radio stations Platforms used to access radio stations Importance of features for a new local radio station Propensity to listen to a new local radio station Impact of new local radio station on current radio listening patterns.
c. How research was conducted	Research questionnaire was overseen by Hallett Arendt, with research conducted by 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 Ipswich TSA to provide a representative sample of the population.
d. Size and composition of the sample	410 interviews with adults 15+. Quotas were applied to control demographics, gender and status based on the known profile of the licence area.
e. When and where research was conducted	Survey conducted between 10 th November and 2 nd December 2017 by CLG Market Research UK. 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.

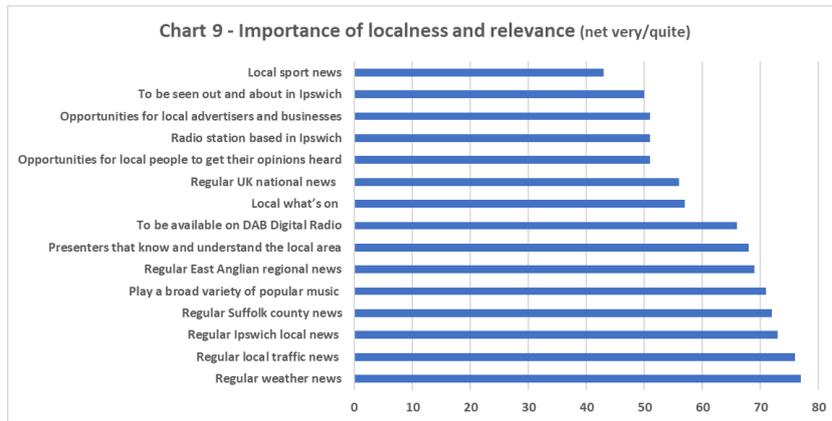
Full data tables are submitted in Part C.

Local 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.

Summary of Findings

- Our research highlighted that 55% have never listened to Town 102, with over half of non-listeners highlighting "I don't like the music they play" as their reason for not listening.
- 19% used to listen to Town 102 but do not anymore, 13% listen occasionally (at least monthly) and only 13% listen regularly (at least weekly).
- Local stations that respondents listen to regularly (at least weekly) were BBC Radio Suffolk 31%, Kiss 27% and Heart Suffolk 20%. We were pleased to note that 1% listen regularly to local DAB only services Chris Country and Suffolk First.
- In relation to how they listen to radio stations, 78% of respondents stated 'On an AM/FM radio' and 38% 'On a DAB Digital Radio'. Amongst 55+ respondents, 'On a DAB Digital Radio' rose to 47%, the highest of any age group, whilst amongst 35+ respondents' response was 40%, highlighting the importance of broadcasting on DAB to reach the majority of the local population.

Chart 9 summarises in the importance of localness and relevance.



- In relation to the importance of localness and relevance, highest scoring were regular weather news (77%), local traffic news (76%), Ipswich local news (73%), Suffolk county news (72%), East Anglian regional news (69%) and local what's on (57%).
- 71% said it was at least quite important that the new station "plays a broad variety of popular music".
- In relation to how 'local' a local station should be, respondents stated 'Presenters that know and understand the local area' 68%, 'Opportunities for local people to get their voices and opinions heard' 51% and 'Be seen out and about in Ipswich' 50%.
- 66% highlighted that a local station should 'be available on DAB Digital Radio'.
- Strong demand for a new station was found, as highlighted in potential size of audience, average hours they would spend listening and the positive impact that such as station would have on the market as a whole.



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.

We have won heartening and warm support from local advertisers, agencies and high-profile individuals.

“Having spoken to you and various other people, including a representative of Celador, I feel I now know enough to be able to give you a very strong message of support. As MP for Ipswich I am convinced of the need for a viable commercial local radio station to complement the service from the local BBC Radio Suffolk.

It is essential that this should be a genuinely local station, based among its audience, and broadcasting content which is determined by and sensitive to the needs of Ipswich people. I do not believe Ipswich people would welcome a radio station that was based in Norwich, nor would they regard it as local. I am determined to help foster a strong community spirit in our town and I believe that a truly local radio station can help in that. The Ipswich FM bid gives the opportunity for Ipswich-based broadcasters, with a proven track record, to help to deliver a genuinely local radio station and I fully support their bid.”

Sandy Martin MP
MP for Ipswich

“I fully support the Ipswich FM venture as I was extremely disappointed when I heard the news about Town 102. The original 102 licence was for an Ipswich based radio station offering local news and content and I believe this was violated when the move was made to centralise the programming. There is still a need and want for true, local radio stations from local businesses. Many of our clients are disillusioned with the recent news of Town 102 and have noticed falling responses to their radio campaigns (due to falling audiences).”

Tanya Ruffles
Managing Director, RB Agency, Felixstowe

“We’re very much behind this. Since the takeover we haven’t listened to Town 102. We didn’t switch because of the takeover, we gave it a chance, but we only lasted a week. And we listened every day in this office since we set up the business! It’s no longer the place to go for Ipswich/East Suffolk news, which is a shame. From a PR point of view, we’d be very happy to support something new which was interested in what our clients are up to! Good luck with everything, you have our support 100%.”

Helen Rudd
Managing Director, Prominent PR, Ipswich

“With SGR and now Town 102 going to Norwich, they no longer serve what the people of Ipswich need. We deserve a loyal local station passionate about the town and promoting it. We want to be told how good Ipswich is and what we are missing out. Good luck and let’s hope it is successful for the sake of the town.”

Neil Scoggins
SCOG Rail Solutions

“That’s great news, we strongly believe in the power of truly LOCAL radio, I was always disappointed by the lack of DAB transmission from TOWN 102. Good luck with the application.”

David Marsh
Events & Theatre Manager, Stowmarket Town Council



"I'm happy to support you moving forward."

Mark Richards

Ipswich McDonalds franchisee

"A new station for Ipswich is something that I wholeheartedly support."

Terry Baxter

Chairman Ipswich Central

"As a successful business owner that has built his business with the help of local radio, please bring back a local station for us. We have lost the only local station and we now have to listen to what goes on in areas miles away in Norfolk or Essex. I would only be too happy to buy advertising space on a new local station so I hope you are successful."

Karen Argent

Finance Director, Tradesupply Windows Ipswich Ltd



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.

MuxCo Suffolk Radio Ltd confirms there are no issues with regards to the above matters that need to be brought to Ofcom's attention.

Michael Betton.

Name: **Michael Betton**
Position: **Director**
Date: **15th January 2018**



**CERTIFICATE OF INCORPORATION
OF A
PRIVATE LIMITED COMPANY**

Company Number 11139896

The Registrar of Companies for England and Wales, hereby certifies that
MUXCO SUFFOLK RADIO LIMITED

is this day incorporated under the Companies Act 2006 as a private company, that the company is limited by shares, and the situation of its registered office is in England and Wales.

Given at Companies House, Cardiff, on **9th January 2018**.

The above information was communicated by electronic means and authenticated by the
Registrar of Companies under section 1115 of the Companies Act 2006