

Dear Ofcom,

Kiss East should be allowed a change of format, but instead to the format used by Wave 105, defined as:

A LOCALLY ORIENTED MUSIC AND INFORMATION STATION FOR OVER 30s IN THE EAST OF ENGLAND, PLAYING A SPREAD OF MAINSTREAM HITS AND TREATING SPEECH AS AN IMPORTANT INGREDIENT.

I would argue that Greatest Hits Radio is available for those who want it on FM in Essex, Norfolk, Norfolk & North Suffolk and Ipswich on DAB and Bauer should try and compete with STAR Radio by offering a Wave 105-like format which is not available from Bauer in the area.

Wave 105 has a distinct format from Greatest Hits Radio which is:

A SERVICE PROVIDING NEWS, INFORMATION AND MAINSTREAM POPULAR MUSIC FOR THE NORTH NORFOLK AREA.

Even if this means they have to have a local show 6-10am or 4-7pm (or network Rick Jackson's breakfast show from Wave) for the local 3 hour show per localness rules, it would be of more benefit to Bauer to provide this.

Programme sharing between Wave 105 and Kiss East (maybe rebranded to Pulse if Bauer were to extend the brand to the East) would work and it forms a brand extension for Pulse as well.

Bauer Media have shown how profitable the Wave 105 format is and this is what should be rolled out in this region as they currently have not offered in outside of the Solent region.

Greatest Hits Radio already has coverage in much of the areas, but if Bauer Media were to use the A LOCALLY ORIENTED MUSIC AND INFORMATION STATION FOR OVER 30s IN THE EAST OF ENGLAND, PLAYING A SPREAD OF MAINSTREAM HITS AND TREATING SPEECH AS AN IMPORTANT INGREDIENT format, it would work far better.

The other option is for Kiss East to rebrand to Pulse East ("The Biggest Hits, The Biggest Throwbacks") presented from Bauer's Norwich studios and to have 6 hours local, and take all other network programming from Clydebank, Glasgow. This could mean on weekdays:

06:00 - 10:00 Local breakfast

16:00 - 19:00 Local drivetime

or

06:00 - 10:00 Local breakfast

13:00 - 16:00 Local afternoon show

This would be 7 hours local, keeping it within the 6-hour limit.

Arguably, the area should be taking shows like Greigsy, Garry Spence, The GBXPerience (George Bowie), Amber Livingstone and Grant Thomson instead of networked Greatest Hits Radio programming which is already in the area - to convert Kiss East to Greatest Hits Radio is unnecessary duplication.

Cambridgeshire should get these networked shows which are not available currently to their audience and it provides the area with new presenters and advertising opportunities for Bauer.

The existing Pulse station is already 3 hours a week local, no local programming at weekends.

However, due to the semi-rural TSA, I would argue that 3 hours of locality would not suit the area, so perhaps 6 hours local if enhanced news commitments are met, as per <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/radio->

[broadcasters/localness](#) which states that a minimum of 6 hours of locally-made programming between 6am and 7pm if they are providing local news at least hourly at peak-times (breakfast and afternoon drivetime) should be offered.

There are convincing arguments to be made for this, and it would be satisfactory for the target audience and TSA.

Bauer could keep Kiss on DAB and maybe have this new station as "Pulse 2 East" or similar sort of branding, for Pulse has brand equity, and this works as a brand extension of sorts.

Although Pulse currently has no brand equity in East of England, the same argument could be made for Heart pre-2009 or, way back in 1991, Pulse 1, for the original Pulse station in Bradford (now in Leeds) is 32 years old.

As it were, either option works out better for this license, and there are good commercial reasons for doing so - Pulse is a brand that could resonate with the audience well.

This would be offering Bauer Media a test bed for brand extension on an already profitable brand.