

Kiss (East of England) Request to change Format

Response to Ofcom's Consultation from Star Radio

We welcome the opportunity to comment on Bauer's request to alter the 'Character of Service' for their East of England regional service, Kiss.

Star Radio is the local commercial radio station broadcasting to Cambridge and surrounding towns and villages including Ely, Haverhill, St Ives and Saffron Walden. It is independently owned and operated.

Star broadcasts a 'classic hits' format, with a playlist consisting of popular songs from the 1970s, 80s and 90s, along with local news and information for Cambridge and surrounding towns and villages.

The existing Kiss East Total Survey Area overlaps entirely with the Star Radio broadcast area and this would remain the case should Bauer's request be approved.

For consistency, we have selected the BBC Radio Cambridgeshire TSA in our response as it covers both Cambridge and Peterborough and has existed for a longer period than Star's RAJAR TSA which was only introduced in 2021.

We agree with Ofcom's preliminary view that the Format change requested by Bauer Radio would, *"significantly alter the character of the service in relation to the nature of the station's programming and target audience"* and note that the application is being made by Bauer solely under statutory criterion (d) of section 106(1A) – namely that there is evidence that, amongst persons living in that area or locality, there is a significant demand for, or significant support for, the change that would result from the departure.

In summary:

1. We disagree that Bauer has demonstrated a significant demand for, or significant support for the change
2. We believe the removal of Kiss from these transmitters would narrow the range of programmes available by way of relevant independent radio services to persons living in the area or locality for which the service is licensed to be provided (section 106 b);
3. Furthermore, the proposed format change would not be conducive to the maintenance or promotion of fair and effective competition in that area or locality (section 105c);

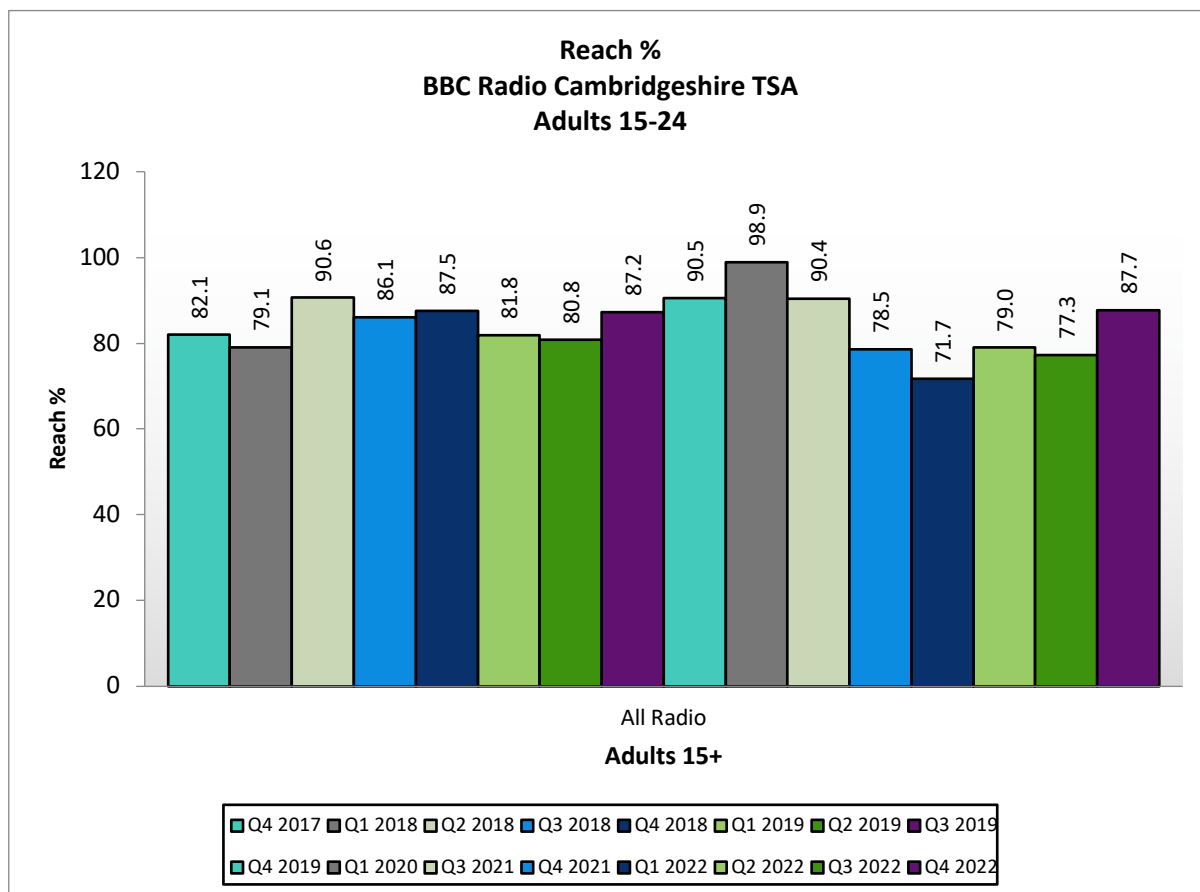
1. Significant demand for, or significant support for the change

a) RAJAR

Bauer has demonstrated neither significant demand for, nor significant support for its proposals by RAJAR.

What is beyond doubt is that Kiss has fallen sharply in popularity in Cambridgeshire in recent years.

Whilst it is not for us to comment on another broadcaster’s programming or marketing strategy, we note with interest that ‘All Radio’ reach within 15-24 year-olds in Cambridgeshire has in fact risen over the last five years, suggesting that the broadcast radio is still appreciated by under 30s.



b) Bauer’s Research Exercise

We agree with Ofcom that the sample size is small, and it is unclear how it is split by transmitter area. Although all are in the East of England, Peterborough, Suffolk and

Cambridge differ in many ways – not least as Cambridge’s population includes 24,270 students, a fifth of the city’s population, so one would expect the sample in Cambridge to be weighted to reflect this.

We note that the 16-24 cohort (the group most likely to be impacted by the removal of Kiss from FM) represents the second-smallest sample of respondents.

We question the wording of the station descriptions presented to respondents.

- *Greatest Hits: A station playing classic pop and rock hits of the 70s, 80s and 90s with specialist features, local news and information appealing to 25-54 year-olds (presented by well-known names such as Simon Mayo)*
- *Kiss: A contemporary and classic dance music station appealing to under 30s*

The description of Greatest Hits runs to 35 words and is more descriptive and detailed than that applied to Kiss, which is just 11 words long, and lifted from an Ofcom format document. We believe the survey results might have been different if, say, Kiss had been presented as follows:

- *Kiss: The beat of the UK, combining Old Skool and Anthems with newer tracks from Little Mix and Justin Bieber, hosted by presenters including Jordan and Perri and featuring specialist shows from DJs like Joel Corry.*

2. We believe the removal of Kiss from these transmitters would narrow the range of programmes available by way of relevant independent radio services to persons living in the area or locality for which the service is licensed to be provided (section 106 b);

Cambridgeshire’s commercial radio offering is dominated by stations of appeal to the over 30s – namely Star Radio (Cambridge and Ely), Heart (Cambridge/Newmarket) and Heart (Peterborough) and Smooth Radio (Peterborough) and Gold (Peterborough) with Kiss (East) having the only Ofcom format that specifically mentions a sub-30-year-old target audience.

Furthermore, it the only format that includes a specialist music requirement and it is the only format that specifies a contemporary music be included.

Removing Kiss and replacing it with Greatest Hits Radio would clearly narrow the range of programmes available on relevant independent radio services.

3. Furthermore, the proposed format change would not be conducive to the maintenance or promotion of fair and effective competition in that area or locality (section 105c);

Permitting Kiss in Cambridgeshire to flip to Greatest Hits Radio would do the reverse, potentially damaging existing operators and reducing fair and effective competition for audiences.

Whilst Kiss is licenced as a ‘regional’ licence, permitting a split in its FM transmission network would create a de facto local service.

This effective conversion of a specialist regional licence into a mainstream, local service complete with the addition of local news and regional programming as proposed by Bauer could threaten the viability of stations like Star Radio, which is unable to benefit from the operational synergies of a larger network yet still provides high-quality output that, judging by RAJAR, is growing steadily in popularity.

Conclusion

In conclusion, we ask Ofcom to refuse Bauer permission to change the format from Kiss to Greatest Hits Radio.

Such a profound shift would clearly narrow listening choice, removing a youth-oriented service in Cambridge and Peterborough, replacing it with yet another radio station targeting an already super-served audience. Both Cambridge and Peterborough are ethnically diverse, and Kiss, with its commitment to specialist programming, provides a service that is particularly relevant to these communities.

The demand for change has not been conclusively demonstrated.

Finally, we note that there is precedent for Ofcom not consenting for significant changes to ‘Character of Service’ – notably when Real Radio XS in Manchester applied to modify its Format to that of Capital Xtra. Manchester is a significantly larger marketplace with a wider range of licenced radio services.

Star Radio
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