

## **GLOBAL/GMG MERGER INQUIRY**

### **Third party response to the provisional findings**

**5 March 2013**

Dear Competition Commission,

I am currently managing a golf resort in Shropshire and regularly use commercial radio to promote the many service we provide. I read with great interest your published findings and just wanted to get in touch regarding Global's merger with Real and Smooth Limited (RSL).

I would certainly challenge your provisional findings that conclude that as a result of the merger between the parties, there was, or was likely to be, a substantial lessening of competition in the radio market based on the loss of rivalry in the North Wales.

We need to move away from the premise that that commercial radio only competes with other commercial radio for advertising, rather than newspapers, local magazines and other media including digital and social media. You have also failed to account for the very different audiences that stations target. Capital FM, Heart, Gold and Smooth, Real and Real XS target very different audiences and are not close alternatives.

In my opinion one of the primary factors when choosing how we advertise the resort is the geography and particular audience the radio station attracts. For example I would maybe choose to approach Heart FM rather than Smooth due to the listener being the type of person who would be attracted to the type of facilities we have here at the resort. My business needs to target specific audiences who are likely to purchase my products, so an all adult campaign just simply isn't effective enough.

I firmly believe that that the merger will only improve the stations' as a whole and therefore increase the number of listeners which will be a big factor when I am looking for new promotions for my resort.

Yours faithfully

Terence P Southward

General Manager

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