

## stunning locations... extraordinary homes...



Competition Commission Victoria House Southampton Row London WC1B 4AD

5<sup>th</sup> March 2013

Dear Sir,

## Re Global Radio

I am aware of the acquisition of Smooth Radio by Global Radio and the fact the deal was referred to the Competition Commission in 2012. Following the release of your findings in February 2013, I have a number of issues I would like to bring to your attention.

We are a five star luxury holiday home park situated on Anglesey, with most of our owners coming from the North West region. Up until 2010, we operated six sites in North Wales, with a turnover of over [%], employing almost 300 people. Our advertising and marketing expenditure was [%] and even though the size of the business has decreased, our advertising and marketing budget for 2013/4 is still in excess of [%]. We currently employ over 60 people, most of who live locally in Gwynedd.

Like all well run businesses, especially in the current economic climate, we have to ensure our expenditure delivers maximum value and we view all our carefully chosen suppliers as important business partners. Our relationship with Smooth Radio has grown substantially over the years and they are an integral part of our advertising mix. It is critical to our business to build the Plas Coch brand and Smooth has helped us achieve that.

We could, and indeed had in previous years, use an alternative station. However the target audience of Smooth (40 to 60year olds) compliments our own target market. Should we wish to target the local community, Heart offers a viable alternative as their coverage is a lot more localised than and therefore not as regional as Smooth Radio.

I must point out however, that advertising with Smooth is only a part of our advertising strategy, albeit an important part. Our Smooth campaigns are designed to run alongside television adverts, editorials in local magazines, e.g. Cheshire Life, as well as extensive use of internet based marketing and traditional marketing methods i.e. leaflets in local newspapers. In the event that Smooth Radio became too expensive, we could substitute radio for a variety of media, which would generate similar results.







The acquisition will ensure Smooth is able to grow its target audience, and therefore extend the audience we can reach. A stronger group post acquisition could give us more choice in the future – a North West Classic FM could be a viable alternative.

I hope the above will help you reach the decision that will benefit both my organisation and North West radio generally, namely that the acquisition should be allowed to proceed.

[Yours Faithfully Dean Styger FCMA Managing Director]