

Question	Your response
<p><b>Question 1: Do you have any observations or comments regarding the proposed changes to Section 2 of the Code dealing with Scope, Tests and Inspection? In particular do you have any comments on the changes relating to carrying out acceptance testing, and providing information to licensees? Is there anything missing that could make the process smoother?</b></p>	<p>No observations or comments.</p>
<p><b>Question 2: Do you have any observations regarding the proposed changes to Section 3 of the Code dealing with FM transmission?</b></p>	<p>No observations or comments</p>
<p><b>Question 3: Do you agree with our proposals for amending the Section 4 dealing with AM transmission?</b></p> <p>If you are an existing AM broadcaster that is interested in adopting a wider audio bandwidth, please first discuss feasibility with your transmission service provider. If, following that discussion, you believe making a change is feasible then let us know the following:</p> <ul style="list-style-type: none"> <li>- A brief description of what you would like to do regarding audio bandwidth, and what changes would be needed to the Code provisions (permitted audio bandwidth, sideband level etc) to enable the transmitter modification to go ahead. Please also let us know how much it might cost to make the change and what the time-scale to implement the change would be.</li> </ul>	<p>Yes. Allowing improved audio bandwidth should be an option for those stations who do not have any neighbouring adjacent channel stations.</p> <p>We believe a bandwidth of upto +/- 12Khz should be considered.</p> <p>However, we believe increased bandwidth should only be adopted DURING DAYLIGHT HOURS ONLY. There is a danger that general increased bandwidth throughout Europe could lead to a very poor situation, as there are many examples of low power transmissions on first adjacent channels to high powered transmissions from other countries. Should those other countries allow wider bandwidth on their high powered services, it could have a very negative effect on lower power adjacent services.</p> <p>Stations wishing to adopt wider bandwidth should demonstrate technical prowess to implement suitable day/night switching of audio bandwidth.</p> <p>The cost and time to increase bandwidth on duly authorised stations could be fairly minimal. Many Am stations now operate “digital” audio processing equipment, in which the bandwidth is a simple user preset. Such processors often have integral “time of day clock” to select preset modes, or have external GPIO connectivity to al-</p>

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	<p>low presets to be selected by an external sun-synchronised time switch. Older “analogue” processors may be more difficult to operate with wider bandwidth as the final stage filtering is hardware based. Some processors can be fitted with more than one filter card, but it is unlikely that more than one card is available to the operator, or that updated cards are available for older equipment.</p>
<p><b>Question 4: Do you have any general comments regarding the proposed amendments to Section 5 dealing with transmitter equipment?</b></p>	<p>We note the requirement for a directional coupler has been dropped – perhaps this should only apply below a certain power limit – such as 250 watts transmitter power? Installations above that level still requiring a coupler?</p> <p>We welcome the inclusion of requirements to consider breakdowns/resilience and continuity of service, but have no particular comments or observations in this regard.</p>

Although not discussed in this consultation we think that some effort to regenerate interest in the AM band should be considered.

For example, there should be an easy process to authorise transmission of C-QUAM AM stereo in conjunction with the proposed wider bandwidth. We believe this is easily within the scope of a technical code review.

We also think that stations should be allowed to test new technologies such as DRM though we appreciate this is more of a policy scope rather than technical code consideration.

Further policy considerations could include allowing power increases for AM stations who can demonstrate the technical and financial ability to do so, and, following the general withdrawal from the band of many services, (local and national, BBC and commercial, etc) a general discussion and overhaul of the band and service planning to allow encourage new services, etc. to maximise efficient use and not neglect this valuable spectrum resource.