

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 comments as not relevant to us at this time.</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>Not relevant to us at this time.</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</li> </ul>	<p>Yes. A better audio bandwidth should be considered where it will not cause undue interference to adjacent stations.</p> <p>A bandwidth of 10-12Khz could be considered.</p> <p>We believe however, that this increase should only be allowed during daytime hours and that some means of reducing bandwidth at nighttime must be implemented.</p> <p>24/7 operation at increased bandwidth is likely to be severely impaired due to the number of high powered European stations on adjacent channels to relatively low powered UK stations. If other European countries were also to allow wider bandwidth at nighttime, it would lead to very unsatisfactory service and a lot of objectionable mutual interference.</p> <p>We believe that stations wishing to implement wider bandwidth should be able to demonstrate/document means of selecting/switching day and night time bandwidth.</p>

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<p>change and what the time-scale to implement the change would be.</p>	<p>For a station using modern audio processing, the ability to select different bandwidths is often as simple as selecting a suitable “user preset”. Modern digital processors often have built in time scheduling, and/or allow external control of preset modes from an external device such as a time switch (which would need to be dawn/dusk operated)</p> <p>The cost, effort and timescales to do so would be fairly minimal in many cases. This of course assumes that a suitable wideband audio source and effective antenna is available.</p> <p>For stations with relatively narrowband antennas there may be significant costs and technicalities involved and for stations with older audio processing, a new “digital” processor may be required.</p> <p>The OFCOM technical code would need to reflect the wider operating bandwidth when discussing antenna return loss and transmitter functionality, etc.</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>No – this does not seem relevant to us.</p>

We are disappointed that OFCOM have not considered nor tabled for discussion in this review the adoption of AM stereo broadcasting, using, for example, the C-QUAM system. We believe this could have been part of this consultation and if adopted would give broadcasters an extra tool to improve the perception of AM radio. AM Stereo would nicely complement the option of increased bandwidth.

As previously discussed between *[name redacted]* and OFCOM, we believe the current planning policy for AM, with respect to field strength in light of modern significantly increased background noise is out of date and would benefit from a review and update. As previous, we would welcome the opportunity to discuss this further with OFCOM.

We would also welcome further discussions with OFCOM regarding re-allocation of AM channels which have been vacated by the large broadcasting groups. Such channels could easily be reused to provide new or additional services. Despite the claims of the large broadcasters we believe AM has a future and it is a very efficient use of limited spectrum. We believe that some frequencies, such as the higher part of the band could be re-allocated to

some form of “micro-broadcasting” as has been authorised in The Netherlands, and the lower frequencies used for larger regional stations serving niche audiences. We do appreciate this is beyond the scope of this current engineering code review and is more of a long-term policy review, but we would be keen to see OFCOM take this initiative. During the last 7 years *[name redacted]* has successfully run a self/listener financed service on AM, invested in solar power and gained an audience of not-just long term supporters, but also casual listeners who feel disenfranchised by the mainstream broadcasters. In a similar manner to heritage and steam railways providing non-commercial services which appeal to the public and sense of nostalgia, we believe the AM band could reflect something similar to demonstrate and reflect the “pre digital age”.