## **Your response**

Your response
Is this response confidential? – No
Covid-19 has impacted community radio stations significantly.
Many community radio stations that service the most deprived, socially excluded and poverty stricken communities, where mental health is a huge concern since the pandemic, are pleading with you to hear and address our concerns. We sincerely hope that this consultation exercise will not be in vain and that you will help our just and important concerns about the difficulties and strains that AM frequency is having on our sustainability. We feel that if Ofcom is genuinely concerned about our welfare then it will listen to and address these concerns which we state below.
We would like to request that Ofcom open up FM frequencies to community radio stations broadcasting on AM / MW band which are in most incredible position. As in Ofcom, consultation notices in 1.9 on page 4 it states that  "Demand for FM frequencies is higher than AM frequencies as FM offers a higher sound quality and better immunity to interference, most analogue radio listening is now on FM and transmission arrangements are cheaper and simpler on FM than AM".
So we believe that to accommodate the existing AM/MW stations on FM Band is more important than to offer more frequencies for RSLS.
Continuing on AM is unsustainable, expensive and extremely detrimental to us especially as we provide an essential awareness and community service which thousands of people depend on in a very deprived area.
There are so many problems with AM:

The costs of AM transmission are be several times higher than covering the equivalent area on FM. This is due, for the most part, to the larger antennas and space required—in many cases, a small field and a mast up to 20 metres high will be needed for a small local AM station.

There is a big difference in the antenna requirements between FM and AM and a correspondingly higher cost of this together with the mandatory ground system required.

- 1) Present times most of the local radio stations operating and serving Ethnic communities are on FM spectrum (with the exception of a few) therefore FM is by far the listeners preferred choice and serving the purpose of a community radio station, to entertain and inform, when mainstream stations have different agenda. Listeners are therefore more inclined to tune into Stations broadcasting on FM due to Quality of Signal.
- 2) AM popular at one time but now defunct across the world and considered old-fashioned band and hence not popular with listener.
- 3) The AM reception is very poor in signal quality compared with FM.
- 4) The majority of new vehicles do not offer AM band option; they only come with FM/DAB band option.
- 5) To listen to AM radio, someone has to search for it on the frequency dial, but FM frequency comes automatically due to new system in the cars.
- 6) Most of the potential advertisers are really hesitant to advertise on medium wave radio due to the facts mentioned above.
- 7) Most of the sponsors/advertisers who advertise on AM radio once, when they don't get any response from advertising, they never advertise again.

- 8) Lack of listenership is the main problem, being on AM band.
- 9) The volunteers who get training on AM radio, after getting full training, they leave the station to join some other FM Radio as they think noone listens to the AM radio due to the lack of response or telephone calls.
- 10) Also transmission quality deteriorates as it gets to winter evenings due to low clouds and atmospheric changes.
- 11) The majority of the listeners that these particular stations were/are designed to cater for will often have old hi-fi radio systems in the homes which do not come with loop antenna for AM Band, so they cannot listen to the AM radio.
- 12) General feedback from would be or most loyal listeners is that we must go for a FM frequency if we want the station to carry on.
- 13) So absolutely there is no future for the new low power community radio stations on AM except struggling and inevitably close as many a non Asian stations even broadcasting on FM have found out in the past, Simply because they have more competition than Asian stations. Asian stations are presently able to exist due to the fact that a lot of their audiences have not moved with the times however their main choice and preference presently is and would be FM for a long while rather than AM or DAB.

And to sum it up The overall cost of setting up a MW community radio station is 5 times that of FM and Income is 5 times less than that which can be reasonably expected on FM.

Below At a Glance overview of Difficulties face by AM stations

Some of the overall pro's and cons AM-FM

Few installation companies
Few experts with suitable knowledge and
experience
Poor listener acceptability
Poor licensing record - only 5 out of a total of

274 UK awards Low receiver availability Lower audio quality Subject to overseas interference outside daylight hours Unpredictable coverage Very large and expensive antenna Requirement for specific site size and features Low availability of UK-produced transmitters Low availability of suitable Aerial Tuning Units. Higher price for transmitters and ancilliaries Uncertainty as to CE-marking of imported equipment
Is this response confidential? — N Only comments as above
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Is this response confidential? — N  Only comments as above
Is this response confidential? –N  The application process is good and straightforward