

Arqiva Submission: Ofcom Consultation ‘Analogue Radio Technical Code’

Arqiva welcomes the opportunity to respond to the Ofcom consultation on updating the Ofcom Site Engineering Code for Analogue Radio Broadcast Transmission Systems.

Arqiva is a communications, infrastructure and media services company at the heart of the broadcast and utilities sectors in the UK. We deliver broadcast television and radio services nationally and provide satellite data and gateway services. We also provide machine-to-machine connectivity for smart metering within the energy and water sectors.

Set out below is our response to the consultation questions.

Response to consultation questions

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?

Arqiva recognises and supports the importance of carrying out testing for compliance with the Analogue Radio Technical Code. Given the number of analogue radio services that may be transmitted from any one site, we appreciate the need to ensure that the requirements of the code and the Wireless Telegraphy Act and Broadcasting Act licences are met, so as to protect all existing services as well as for the performance of any additional services.

Arqiva has an established maintenance regime to address both preventative maintenance to aim to ensure the correct performance of the licensed transmitter and antenna systems and corrective maintenance to respond to any faults or other issues with the services for all broadcast service customers. As part of this, Arqiva may routinely need to update the alignment of the systems delivering analogue radio services and potentially replace existing equipment.

We note the proposed change in section 2.4 for Commissioning Tests and Subsequent Modifications to add “or adjustment” in the sentence “No change or adjustment to the transmitter, RF distribution system or aerials...”.

We are particularly concerned that this may bring in to scope all preventative and corrective maintenance activities that are part of the normal operation of the services. This would provide a very significant resource commitment on Ofcom and is possibly not what was intended.

We accept that where any change is required in the operating parameters of a service that would result in a change in the licensed delivery of the service, it might be appropriate to include Ofcom

in the change process. We do not see the benefit of Ofcom involvement in all maintenance activities.

Arqiva would ask that Ofcom either amend or remove this change, so as not to introduce a burdensome requirement for both Ofcom and Arqiva.

Question 2

Do you have any observations regarding the proposed changes to Section 3 of the Code dealing with FM transmission?

Arqiva has no comment on these changes currently.

Question 3

Do you agree with our proposals for amending the Section 4 dealing with AM transmission?

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:

- 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 timescale to implement the change would be.

Arqiva has no comment on these changes currently.

Question 4

Do you have any general comments regarding the proposed amendments to Section 5 dealing with transmitter equipment?

Arqiva has no comment on these changes currently.



About Arqiva

Arqiva is a leading UK communications service and infrastructure provider serving multiple industries.

We operate at the forefront of the UK broadcast industry, enabling our customers to reach and engage audiences across technologies and platforms for watching TV, listening to radio and other content. We deliver a range of products and services for the management and distribution of content at-scale, both in the UK and internationally. We are also a UK critical national infrastructure operator, managing the digital terrestrial television (DTT) network and broadcast radio network that ensures the universal availability of a wide range of free-to-air TV and radio services. Our customers include UK public service broadcasters, as well as a wide range of commercial TV and radio providers, which deliver news, information, education, and entertainment across the entire UK.

We are dedicated to supporting and advancing the UK's broadcast and streaming industries, ensuring that our customers can deliver their content to audiences wherever they are and however they choose to watch or listen— with services meeting the highest standards for user experience, reliability, and security.