



Commercial Radio Companies Association
1973-2003 Celebrating 30 years of UK Commercial Radio

450-470 MHz Band Alignment

**A Follow-Up Response by CRCA
to the
Radiocommunications Agency Consultation Document**

18 April 2003



Introduction

CRCA made an initial response to this consultation on 24 March 2003. Since then CRCA has sought more detailed information from those of its members that will be affected by the proposed band reversal.

JFMG has issued around 70 licences amongst CRCA member radio stations for PMSE use in the band 440-470 MHz. Individual stations hold some of these licences, while others are held by holding companies on behalf of radio companies. In many cases, each individual radio company operates two radio stations, one on FM, the other on AM, but shares the PMSE across both stations.

CRCA Investigation

CRCA has written to 67 JFMG licensed member companies explaining the band reversal project and seeking details of the commercial and operational impact of the proposed changes.

We have received responses representing around 40 member companies that jointly make use of well over 200 pieces of equipment. From our investigation, we have confirmed that this project will incur substantial costs on the commercial radio sector. **We estimate the costs will be in excess of £300k.**

This figure assumes that around half of the channel changes will be less than 5 MHz to allow a proportion of the equipment to be re-engineered. This is necessarily an estimate at present as the extent of channel changes has yet to be published.

Information from Suppliers

Much of the equipment in use is produced by a small number of niche manufacturers. An indication from the manufacturers suggests that frequency changes of less than 2 MHz can be accommodated by re-crystalling and adjustment. Changes of between 2 & 5 MHz will require labour-intensive component changes, while larger frequency changes will require large-scale module or complete equipment replacement. (The actual impact will vary from equipment to equipment.)

Summary Results

On the basis of the responses received from 40 CRCA members, the total cost to 67 CRCA users has been cautiously extrapolated.

Category	Cost Estimate
Equipment Replacement	£213k
Re-Engineering	£102k
Total	£315k

A cost in excess of £300k represents a substantial outlay to be borne by commercial radio companies. The band reversal project will offer little if any benefit to these companies and the project will also incur substantial disruption whilst equipment and systems are re-engineered.

Having been made more fully aware of the project, a number of CRCA members are now planning to delay ordering any new equipment. This will also have an impact on equipment manufacturers.

Conclusion

Having undertaken this investigation, CRCA has confirmed the conclusions reached in our original submission; that substantial cost and little or no benefit will arise for its members from the band re-alignment. However we recognise that there are strategic reasons driving the project and that other users of the band may benefit. Therefore if the project must proceed, CRCA would wish to see the following:

- A means of offsetting the costs to our members where no benefit flows from the re-alignment
- An undertaking that following re-alignment, the resulting PMSE channels and the current analogue 50kHz channel technology will continue to be licensable, broadly as at present, for a minimum of 15 years and thereafter until some appropriate and cost-effective alternative is available
- The resulting PMSE channels are at least as functional in terms of low interference, high audio quality, airborne use and varying bandwidth as the current channels
- Every effort is made to identify additional channels for PMSE quality audio channels as a result of the re-alignment project.

Any enquiries in relation to this response should be addressed either to:

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