Your response

Question	Your response
Question 1: Do you agree that Ofcom should give its consent to the closure of the four transmitter sites proposed by talkSPORT with the resulting reductions in AM (medium wave) transmitter coverage? If you do not agree, please give reasons.	I am concerned about the effect that this closure will have on other broadcasters using the AM (medium wave) frequencies. Although I did not regularly listen to talkSPORT, I do listen regularly to other AM stations, including Radio Caroline, the now-closed Absolute Radio, and (my local AM station) Forth 2. Indeed, I have several radios going back to the 1940s with AM capabilities.

My concern is that the cost of operating an AM service will increase as the number of AM service operators decreases (due to the fixed costs of running the transmitters being shared among fewer operators). As such, I feel that permitting services such as talkSPORT to reduce their AM coverage will have an adverse affect on all the AM operators.

I understand that the DCMS's Digital Radio and Audio Review study from 2021 gives a key recommendation for AM services in general to be migrated, however I feel that the logic for this migration is ill-conceived. One of the most common arguments against AM services is their high energy usage, however this is often measured from the perspective of the operators, and does not consider the "overall" energy usage.

By way of example, while the energy costs for operating an AM transmitter will be higher than that of a web server offering an IP-based internet radio stream, the latter option has a significantly higher overall power usage compared to the battery-powered AM sets which are common. This is because the entire "pipeline" of the IP-distribution, which by it's nature is not a broadcast medium, most be considered. Piping a stream to each individual user requires substantial energy usage in data centres, ISPs, and consumer routers and IPstream receivers. So I feel that the argument of "AM has higher energy consumption" is a red herring.

Finally, maintaining the ability for AM broadcasts is vital for emergency and disaster situations.

Therefore, for the above reasons, while I am not directly opposed to the reduction in the talkSPORT service, I am extremely concerned about the affect that this reduction will have on the wider UK AM broadcasting sector, and would urge Ofcom to carefully consider how the damage to the sector that this service reduction will case can be protected against.

Question	Your response
Question 2: Do you agree that there will be no impact on opportunities for persons to use the Welsh language or on treating the Welsh language, no less favourably than the English language because this proposal relates to AM coverage area and none of the transmitters affected are located in Wales. If you do not agree, please give reasons.	I have no opinion on this.