Draft Variation to Licence Area Plan
Bendigo, Horsham, Shepparton
2016
Commercial Radio Australia Response

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V1.0
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EXECUTIVE SUMMARY

Commercial Radio Australia (CRA) represents 261 commercial radio licensees across the country. Commercial Radio Australia is pleased to be given the opportunity to comment on the proposed Licence Area Plan variations for the Bendigo, Horsham and Shepparton licence areas.

A review by CRA of the proposed variations has shown that the majority have little or no impact on CRA’s members, however there are a few items where CRA has some concerns.

First we are concerned about the expansion of community broadcasting areas and how they may be considered in terms of regional DAB+ rollout especially when those areas overlap multiple existing commercial licence areas.

For example the proposed new Alexandra/Eildon RA1 licence area as discussed in preliminary view 8 is very large and overlaps parts of the existing commercial licence areas of the Remote Central, Shepparton and Melbourne licence areas. Additionally, the proposed Mansfield RA1 licence area overlaps parts of the Remote Central, Shepparton, Wangaratta and licence areas.

CRA is very concerned that while such expansions are claimed to represent the community interests, the size and breadth of the expansion, particularly the Alexandra/Eildon proposal, appears to be more orientated at commercial operation given the geographic dispersion of the population centres that would be covered. CRA request that the ACMA examine the rationale and measure the community desire for such a large and geographically diverse licence area for community broadcasting.

Secondly, given the move of 3SR FM and Star FM from their location at Mt Buller to The Paps near Mansfield as described in preliminary view 6, CRA supports the request of Flow FM to increase their power at Mt Buller to provide suitable coverage for both normal transmissions and emergency situations.

Thirdly CRA is concerned about the use of scarce FM spectrum for the establishment of transmissions for services which have very low consumption. CRA will strongly object to any transmissions which will impact the AM to FM conversion process. For example there are proposed AM to FM conversion in both Wangaratta and Deniliquin which could be impacted by the expansion of both community and national services in Shepparton and Horsham respectively. CRA requests assurances from the ACMA that the proposed variations will not impact those AM to FM conversion projects. CRA firmly believe that existing popular local services should be given priority over low use non-local services as this better serves the public interest.
The ACMA has published three LAP variation documents covering various changes and additions in the Shepparton, Horsham and Bendigo licence areas.

The main variations relate to:

- Additional spectrum for in-fill / repeaters
- Relocation of some repeaters
- Additional Licence Area definitions and expansions for 5 community broadcasters

It is important to note that the ACMA state on p6 of the discussion document that none of the proposed variations will impact the availability of spectrum for the AM to FM conversion programme.

The ACMA has assessed the proposed LAP variations discussed in this paper and has concluded that the proposals for allocation of spectrum or variation of technical specifications in the Bendigo, Horsham and Shepparton licence area plans will not impact on the planning for AM to FM conversions.

The ACMA summarise the changes in the Bendigo LAP as:

- vary the technical specifications of the existing in-fill transmitter at Bendigo City for the commercial radio broadcasting service 3EL to improve coverage
- vary the technical specifications of the existing Maryborough community broadcasting service 3GFM to improve coverage
- vary the Maryborough RA2 licence area
- make spectrum available at Castlemaine for a new long-term community broadcasting service
- determine a new Castlemaine RA1 licence area for the proposed new community radio broadcasting service.

CRA response to ACMA Preliminary view 1

In the Bendigo Radio LAP change the technical specifications of the existing Maryborough 3EL commercial radio broadcasting service FM in-fill transmitter at Bendigo City to increase its maximum ERP to 250 W and antenna height to 90 metres, and allow a change of nominal transmitter site location.

The commercial service is operated by Grant Broadcasting radio network. The changes proposed will improve coverage of Bendigo city. The 3EL transmission is actually licenced for the Maryborough RA1 licence area (and also called central Victoria).

CRA agrees with the ACMA regarding the variation for this transmission.

CRA response to ACMA Preliminary View 2

The ACMA proposes the following variations:
change the technical specifications of the existing Maryborough community radio broadcasting service 3GFM to increase its maximum ERP to 500 W and allow a change of nominal transmitter site, and consequently expand the Maryborough RA2 licence area (Preliminary view 2)

• make spectrum available for a long-term community radio broadcasting service at Castlemaine (Preliminary view 2).

CRA has no comment on these variations.

3. In the Horsham LAP

The ACMA summarise the changes in the Horsham LAP:

• vary the technical specifications of the existing ABC Parliamentary News Network (PNN) national service at Horsham
• vary the technical specifications of three planned, but not implemented, Horsham national services
• make spectrum available at Ararat for a new in-fill transmitter for the 3WM Horsham AM commercial service
• make spectrum available at Nhill for a new in-fill transmitter for the 3WM Horsham AM commercial service
• make spectrum available at Hopetoun for a new in-fill transmitter for the 3WWM Horsham FM commercial service.

CRA response to ACMA Preliminary view 3

• change the technical specification of the existing Horsham ABC PNN service at 89.3 MHz to reflect the actual operating condition (Preliminary view 3)
• change the technical specifications of the planned Horsham national service at 90.1 MHz to reduce the maximum ERP (Preliminary view 3)
• change the technical specifications of the planned Horsham national service at 90.9 MHz to reduce the maximum ERP (Preliminary view 3)
• change the technical specifications of the planned Horsham national service at 99.7 MHz to reduce the maximum ERP (Preliminary view 3)

This variation deals with changes to the transmission of ABC News Radio (3PNN) in the Horsham licence area.

While CRA agrees with Flow FM that the use of spectrum and additional transmissions seems excessive as long as the spectrum assignment does not prejudice any AM to FM conversion projects (as stated in the discussion paper – p6) then CRA will not object.

CRA response to ACMA Preliminary view 4

• make spectrum available for an additional FM in-fill transmitter at Ararat for the Horsham 3WM commercial radio broadcasting service (Preliminary view 4)
• make spectrum available for an additional FM in-fill transmitter at Nhill for the Horsham 3WM commercial radio broadcasting service (Preliminary view 4)
• make spectrum available for an additional FM in-fill transmitter at Hopetoun for the Horsham 3WWM commercial radio broadcasting service (Preliminary view 4).

These variations are to provide repeaters for the Horsham commercial radio service 3WM and 3WWM CRA agrees with the ACMA regarding the variation for these transmissions.
4. In the Shepparton LAP

The ACMA summarise the changes in the Shepparton LAP:

- make spectrum available for an ABC PNN national service at Goulburn Valley
- vary the technical specifications of the existing in-fill transmitter at Mount Buller for the 3SUN Shepparton commercial radio broadcasting service to improve coverage
- make spectrum available at Alexandra/Eildon for an in-fill transmitter for the 3SUN Shepparton commercial radio broadcasting service
- make spectrum available at Mansfield for an in-fill transmitter for the 3SRR Shepparton commercial radio broadcasting service
- make spectrum available at Tolmie for an in-fill transmitter for the 3MCR community radio broadcasting service
- make spectrum available at Woods Point for an in-fill transmitter for the 3MCR community radio broadcasting service
- vary the Mansfield RA1 licence area
- make spectrum available at Seymour for a new long-term community radio broadcasting service
- determine a new Seymour RA1 licence area for the proposed new community radio broadcasting service
- make spectrum available at Kinglake for an in-fill transmitter for the 3UGE community radio broadcasting service
- make spectrum available at Flowerdale/Hazeldene for the 3UGE community radio broadcasting service
- vary the Alexandra/Eildon RA1 licence area.

CRA response to ACMA Preliminary view 5

- make spectrum available for an ABC PNN national broadcasting service at Goulburn Valley (Preliminary view 5)

Reviewing the ACMA discussion:

The proposed specifications for the PNN service at Goulburn Valley did not provide the same level of coverage as existing ABC radio services in the Goulburn Valley, which operate with a maximum ERP of 100 kW. Due to spectrum congestion and the possibility of interference to and from other existing broadcasting services, this proposed 5 kW service was the only option available for the service. The ABC was issued with an apparatus licence in October 2009 for this service.

CRA has concern that the provision of this 3PNN service will impact the availability of FM frequencies for the AM-to-FM conversion process.

CRA response to ACMA Preliminary view 6

- change the technical specifications of the FM in-fill transmitter at Mount Buller for the Shepparton commercial radio broadcasting service 3SUN, including a change of nominal transmitter site (Preliminary view 6)

The Mt Buller variation includes the relocation of the current StarFM and 3SR repeaters at Mt Buller to the Paps site closer to Mansfield. This in effect means that the repeater is focused on the Mansfield region rather than the mountain areas around Mt Buller which will receive marginal coverage in some areas.

CRA supports the request of Flow FM to increase their power at Mt Buller to provide suitable coverage for both normal transmissions and emergency situations.
- make spectrum available to allow ongoing operation of an FM in-fill transmitter at Alexandra/Eildon for the Shepparton 3SUN commercial radio broadcasting service (Preliminary view 6)

The Devils River transmission has been operating as a temporary transmission for many years. The present variation will give that transmission permanent status.

- make spectrum available to allow ongoing operation of an FM in-fill transmitter at Mansfield for the Shepparton 3SRR commercial radio broadcasting service (Preliminary view 6)

This transmission is being moved from the present site at Mt. Buller to The Paps site along with the Star FM service as discussed above.

The existing transmission from Mt Broughton towards Yea has a directional characteristic allowing a maximum of 500W in the arc 130-250°T. The height of the Mt Broughton site is approximately 400m above the area served to the south. This provides good coverage of Yea but also causes fortuitous overspill into the Remote central area operated by Flow FM and the northern part of the Melbourne LAP.

CRA raises no objection to changing the status of the Mt Broughton transmission to permanent (long term) as the transmission has been operating for some years without any issues.

CRA response to ACMA Preliminary view 7

- make spectrum available for an additional FM in-fill transmitter at Tolmie for the Mansfield 3MCR community radio broadcasting service (Preliminary view 7)
- make spectrum available for an additional FM in-fill transmitter at Woods Point for the Mansfield 3MCR community radio broadcasting service (Preliminary view 7)
- expand the Mansfield RA1 licence area to include Tolmie and Woods Point (Preliminary view 7)
- make spectrum available for a long-term community radio broadcasting service at Seymour (Preliminary view 7).
- make spectrum available for an additional FM in-fill transmitter at Flowerdale/Hazeldene for the Alexandra/Eildon 3UGE community radio broadcasting service (Preliminary view 7)
- make spectrum available for an additional FM in-fill transmitter at Kinglake for the Alexandra/Eildon 3UGE community radio broadcasting service (Preliminary view 7)
- expand the Alexandra/Eildon RA1 licence area to include Flowerdale/Hazeldene and Kinglake (Preliminary view 7).

The above variations propose expansion of the community broadcasting transmissions around Mansfield (3MCR) and the Upper Goulburn Valley (3UGE) areas. The transmissions are low power (<1kW) and target specific communities.

CRA is concerned that the expansion of the 3MCR target area and proposed Alexandra/Eildon RA1 (draft) is grouping disparate communities from Kinglake and Marysville in the south to the edge of Mansfield in the north. CRA requests that the justification for such an expansion of community broadcasting is re-examined to ensure that community interest is driving this application rather than commercial opportunity.

CRA response to ACMA Preliminary view 8

> Determine two new licence areas for the new Castlemaine community radio broadcasting service (Bendigo Radio LAP) and Seymour community radio broadcasting service (Shepparton Radio LAP); make new Licence Area Designations (LADs) designating new community licence areas specified in the Bendigo and Shepparton Radio LAPs for new community radio broadcasting service licences that will be made available in those areas; and update the Maryborough RA2, the Mansfield RA1 and the Alexandra/Eildon RA1 licence areas to reflect proposed changes to services in these licence areas (Preliminary view 8).
CRA has no comment on this variation.

CRA response to ACMA Preliminary view 9

> Make minor amendments to update the title, schedules and attachments of the three LAPs (Preliminary view 9).

CRA has no comment on this variation.

5. References


<ends>