Proposed Variations to Tasmanian Radio LAPs
Broadcasting Carriage Policy Section
Australian Communications and Media Authority
PO Box Q500, Queen Victoria Building, NSW 1230

LAPRequests@acma.gov.au

Monday 2 July 2018

7SD FM - Proposed Scottsdale AM Infill Simulcast

Executive Summary
Rebel Media [RM] operates East Australian regional commercial FM radio services BRZ [Breeze] and RBL [Rebel]. Thank you for the opportunity to provide input to the ACMA process.

The ACMA proposal significantly changes the role of the existing 7SD 540 kHz AM service from being the primary transmitter serving 11,875 people in the Scottsdale market, to a non-urban rural black spot infill role serving only ~2,000 people. The signal overspills to 111,734 people or 96% of the adjacent Launceston market, in addition to overspill into the solus component of the Devonport market.

The diminished role of the AM service will markedly increase the ‘Inside to outside market’ overspill ratio from an existing level of 1:9 (11,875:111,734 people) to at least 1:56 (2,000:111,734 people) considering just the Launceston market alone.

RM doesn’t object to the increased overspill ratio if that is deemed the best approach to ensure adequate service of the 7SD licence area, which we concur should be a priority consideration. We note the ACMA’s view it is ‘unacceptable’ that those 2,000 people are not served.

This ACMA position appears inconsistent with its response in shelving RM’s applications over the past 10 years to establish a site in the RM market that will serve 7,700 people that currently receive no service from us, and unavoidably overspills a low grade signal to ~72,000 people, representing an ‘Inside to Outside’ market ratio of 1:9. That’s well below what the ACMA is now proposing for the 7SD AM infill transmitter.

Whether the 7SD AM infill proposal proceeds or not, we are surprised to find the ACMA not only proposing and supporting the 7SD AM infill proposal with a 1:56 overspill ratio, but further considering a licence condition to compel the licensee to provide that infill service.

We hope this represents a change in ACMA planning that puts a renewed and greater emphasis on allowing a licensee to adequately service its market and trust the ACMA will also agree it’s equally
‘unacceptable’ that 7,700 people in one region of our market still can’t access our services at all. The need in our market is arguably greater given approximately 4 times as many people stand to benefit compared to the 7SD AM infill proposal. We ask the ACMA to undertake finalising service planning for the delayed RM pending site as soon as possible.

Detail

RM commends Grant Broadcasters for the quality of its exiting Scottsdale services and its commitment to further expand services in a small regional radio market.

We do not object to the AM infill simulcast proposal, and we generally support the principle of allowing licensees to adequately and practically fully service their licence area as an overriding planning priority. Our interest in this ACMA proposal is to drive a principled and consistent planning outcome for the RM market.

The existing 7SD AM service reaches approximately 11,875 people and 71% of the Scottsdale RA1 population. ACMA modeling shows an overspill to 111,734 people in the adjacent Launceston market and 13,623 in the Devonport licence areas. It is not clear from the ACMA consultation paper how much overspill is common to both Launceston and Devonport licence areas, though some is clearly unique to the Devonport market around the Port Sorell district.

The ACMA’s proposal grants 7SD an FM conversion in most of its market, and radically reduces the role of the 540 kHz 5kw directional 7SD AM service from being the primary 7SD transmitter, to being one of four 7SD transmitters, relied on only to provide non-urban black spot rural coverage that, dependent on the propagation model uniquely serves an estimated 1,175 - 4,425 people that won’t receive at least a 54 db uV/m rural stereo grade of 7SD FM service. To simplify statistical comparison, in this document we’ll reference the unique AM infill coverage as 2,000 people. It is worth noting many of those 2,000 will receive a lower rural mono grade FM service, which is typically quite adequate in a non-competitive and isolated rural environment.

7SD AM already has a ‘Inside to outside market’ ratio of 1:9 (11,875:111,734 people). The 7SD AM signal reaches 112,858 people (111,734 overspill + 1,124 overlap) or 96% of the 117,484 people in the Launceston RA1 market, representing 7 times the entire population of the Scottsdale RA1 market. The ACMA proposal to change the role of the 7SD AM service would result in the planned ‘Inside to Outside’ overspill ratio of the AM service increasing dramatically;

- from the existing 1:9 (11,875:111,734 people) to at least ~1:56 (2,000:111,734 people). This excludes the Devonport solus market overspill component, which will drive that figure higher.

The AM site was planned decades ago as a single site solution to best serve the entire market. If the ACMA changes the AM role substantially, and changes the original AM target signal coverage area by converting most of the existing AM coverage area to FM, we believe it is prudent for the ACMA to review the specifications of any AM station seeking FM conversion against the Technical Planning Guidelines to determine if the existing AM specifications are well suited for a new simulcast infill role, and if necessary,
consider alternative practical options to service the market.

In this instance, practical long term options could include;

- Extending the Launceston licence area further east into the western part of the Scottsdale market, to reduce the number of people who would not receive at least 2 commercial stations planned to cover their area.
- Amalgamation or consolidation of the Scottsdale and Launceston markets, which the ABC serves most of with a single FM site on Mt Barrow, where the Launceston commercial FM’s currently transmit from with a different directional pattern and lower power. In fact, ABC Mt Barrow arguably services more of the Scottsdale market than the 7SD AM 540 signal, particularly on Flinders Island (a target area of the AM infill service role) where 7SD AM 540 rural grade reception is effected by adjacent channel interference from 3GG AM 531 Gippsland.
- Alternative site or specifications for the 7SD primary 5kw FM service, or additional small infill FM translators that cumulatively have lower long term CapEx and OpEx than an expensive 5kw directional multi mast AM service.
- Changing the directional pattern and/or CMF for 7SD 540 kHz. The service has a broadly similar eastern and western lobe utilising 2 masts in a ‘figure 8’ pattern. A relatively simple change to the existing phasing and mast power division ratio could result in less power and reduced overspill west of the site towards Launceston and Devonport, while broadly maintaining or improving coverage east of the site where the majority of its target infill population lies.

In comparison to the 7SD AM infill proposal, frustratingly the ACMA has to date not advanced long standing RM applications to reach 7,700 un-serviced people in a region of the RM market that has been a 10+ year high priority for the licensee. In order to provide an adequate and commercially competitive service to those 7,700 people, the pending RM service unavoidably overspills a low grade signal (below planning urban centre planning target levels), to ~72,000 people outside our market, which is a far lower overspill ratio than the ACMA 7SD AM infill proposal.
The ACMA June 2018 consultation paper refers to the 2,000 people that would otherwise be unserved by 7SD (or would receive a reduced mono grade level of service) as an ‘unacceptable coverage loss’. We hope the proposal signals a change in ACMA planning that puts a renewed and greater emphasis on allowing a licensee to adequately service its market, and we trust the ACMA will also agree its equally ‘unacceptable’ that 7,700 people in one region of the RM market still can’t access our services. Four times as many people stand to benefit from the RM proposal proceeding compared to the ACMA’s 7SD AM infill proposal.

The people of the 7SD license area can clearly look forward to great services with uncompromising coverage.

We ask the ACMA to undertake planning for the delayed RM pending site as soon as possible, and we look forward to working with the ACMA to finalise the services.

Regards

Aaron Jowitt
Managing Director
Rebel Media