Dear Sir/Madam

NEW APPROACH TO AM-FM CONVERSIONS AND IN-FILL TRANSMITTERS FOR COMMERCIAL RADIO BROADCASTING SERVICES

Thank you for the opportunity to comment on the ACMA’s Consultation Paper: A new approach to AM-FM conversions and in-fill transmitters for commercial radio broadcasting services, which was published by the ACMA in November 2016 (Consultation Paper).

Commercial Radio Australia (CRA) is the peak industry body representing the interests of commercial radio broadcasters throughout Australia. CRA broadly supports the ACMA’s proposed revised approach, as set out in the Consultation Paper.

CRA makes the following comments in relation to the two specific discussion issues raised by the ACMA.

1. Proposal to restrict the revised approach to AM-FM conversion to markets that are non-competing, that is, where the population of the legally defined overlap is 30% or less of the population of either of the two affected licence areas.

CRA agrees in principle to this which reflects the commercial radio industry’s policy.

Nevertheless, CRA would support a limited extension of the approach to the two particular licence areas which have been on the list for quite some time and have not been the subject of any objections.

2. Further options for ensuring that planned-for FM in-fill transmitters are implemented, including mechanisms to ensure that FM coverage achieves equivalent coverage to the existing AM transmission.

CRA generally accepts the provisions defined by the ACMA with respect to the construction of in-fill repeaters to ensure that the proposed FM coverage is consistent with the main population coverage of the existing AM service.
With regard to the timing of the implementation of the in-fill repeaters CRA suggests that, as a practical matter, the requirements for the in-fill repeaters to be built concurrently with the main transmitter be relaxed to allow the in-fill repeaters to be constructed after the main transmitter.

This extension in time may allow broadcasters to better manage the construction of their FM facilities, e.g., by using the same construction teams.

Please note that the industry policy does not support any redrawing of LAP boundaries as part of the AM-FM conversion

Yours sincerely

Joan Warner
Chief Executive Officer