Submission for AM to FM conversion

Introduction

8SAT Flow FM operates the commercial license SL010147 in the Remote Commercial Central Zone of SA, Victoria, New South Wales and the Northern Territory.

8SAT does not hold any AM radio services for conversion, however we are adjacent to many regional AM licenses that are or may convert in the future and have a number of comments which we would like to make regarding conversion including, spectrum selection, interference protection, fortuitous reception and existing FM planning. We note that Commercial Radio Australia is apparently assisting ACMA with planning and we urge caution on this planning as a conflict of interest given CRA has previously strongly opposed 8SAT planning and it is our view may see it advantageous to recommend frequencies that would undermine our coverage.

Fortuitous Reception

Given the remote nature of Flow FM services and our listeners reliance on fortuitous road coverage we would not want our fortuitous reception to be impacted by increased interference levels from new frequencies allocated for AM to FM conversion. Listeners across the Remote areas strongly rely on fortuitous reception and ACMA’s own consultation document has highlighted the like value of the existing AM services giving listeners fortuitous reception. We would likewise ask that no valuable fortuitous reception be denigrated by inappropriate frequency selection.

Protection of Flow FM Interference levels

We have noted ACMA planning on recent 8SAT licenses of protection on interference only being down to 66 dBu as opposed to previous protection down to 54 dBu. We don’t believe we have suffered from interference at or anywhere near 66dBu at sites with this stated protection level. If we were to suffer from interference at levels of 66dBu, then at many transmitter locations that we have, they wouldn’t be providing a service to any of the main towns that that service was designed to cover. For this reason it is important that all planning must be done at protection levels no greater than 54dBu regardless of the interference level stated on the licence. These existing transmitters need to continue to provide for an interference free service.

Reduced AM coverage from FM conversion

ACMA has highlighted the issue of AM services giving greater in license and adjacent license fortuitous reception and that on the whole populations of 200 or more people are entitled to a service. 8SAT has highlighted this argument on many occasions in our submissions where unlicensed and unserved towns across adjacent licenses fail to receive an AM or FM service that they are entitled to yet has not been granted licensing to provide those services even fortuitously in the past. It would be inconsistent in ACMA planning to change this policy given its restrictive planning on the same fortuitous coverage for 8SAT. Given conversion of AM in main towns the smaller locals stand to receive even less radio unless specific FM translators are licensed. 8SAT has sought ACMA license extension previously in towns including Kimba, Elliston, Wudinna, Quorn, Orroroo, Burra, Riverton, Balaklava, Waikerie, Morgan, Blanchetown, Swan Reach all have licensees that have requested conversion. Given the unwillingness in the past of the incumbent to provide FM services to these
towns it should be incumbent on ACMA to ensure FM translators are provided in all 200 plus people towns or allow other adjacent broadcasters licensing to provide the service. This should become policy for all future AM to FM conversions. We also note that unlicensed towns may not receive any commercial radio services if all AM’s convert to FM. For Example Lake Bolac Victoria. There are a number of other towns of plus 200 people that would fall into the same category if all AM’s convert. Additionally, we are happy to support adjacent licenses in gaining conversion to FM by providing infill fortuitous reception from existing planned 8SAT services even if it required an upgrade to our specification to do so. This can be achieved in many locations for the current AM to FM licenses seeking conversion.

Existing 8SAT Planning

We note some of our own planning is completed and awaiting ratification for a number of years as supplementary planning but not in Common Law and we would request that none of the frequencies planned would be considered for others licenses AM to FM conversion.

Wayne Phillips
Managing Director
2 December, 2016