ACMA2009/685 and AM/FM Conversion Policy


AM/FM Conversion Policy

A common theme in the Broken Hill, Karratha, Port Hedland and Remote WA proposals for AM to FM conversion is a vast geographic loss of coverage in the outer lightly populated parts of the licence area.

For example, 2BH Broken Hill commenced service in 1934 and geographically serves close to 100% of its licenced market adequately on AM. It is an area of 17,820 km2, with licence area borders stretching up to 135 km from Broken Hill.

The ACMA conversion proposal would see 2BH coverage on FM drop to ~45km radius of Broken Hill, an area of ~6,500 km2. This represents only a ~36% geographic reach in the licence area, and a loss of existing 2BH service to 64% of the licence area.

We have no issue with the conversions themselves, but are curious as to why the authority would leave the 2BH licence area boundaries unchanged when the 2BH licence area coverage reach will drop from 100% to ~36%, with no firm prospects that 2BH or 2HIL (Hill FM) will ever serve the majority of its current licenced market.

The area that will lose 2BH is currently served by commercial TV services direct on satellite. Remote & regional commercial radio services 8SAT (Flow FM), 4BRZ (Breeze FM) & 4RBL (Rebel FM) are long established on satellite and best positioned to provide commercial radio to that area, and to adjacent towns such as Menindee that will lose 2BH reception.

Menindee Lakes & township is wholly or partially within the Flow, Breeze and Rebel licence area,
and I am disappointed to read the ACMA suggestion that Menindee could ‘self help’ apply for an ‘out of area’ temporary 2BH retransmission. With due respect, we believe a more appropriate suggestion from the ACMA would be that the community could consider establishing self help satellite fed FM services for the 3 permanent commercial radio broadcasters that are already licensed for the area.

Satellite is the only proven reliable and cost effective means to high quality feed remote self help FM transmitters. 2BH & 2HIL are not on satellite, nor even stream online.

Our proposal is that when the ACMA progress any commercial AM to FM conversions that result in significant geographic loss of coverage, that the ACMA simultaneously;

1. Reduce the licence area of the station applying for conversion (and its s39 service), to better reflect the rural stereo signal coverage area of the two commercial FM services.
2. Add the excised area to the licence area of the Regional/Remote commercial radio broadcasters operating within those states, as follows;
   - WA conversions : Add to 6FMS and 6SAT licence area
   - SA,VIC,NT,TAS conversions : Add to 8SAT licence area.
   - NSW,QLD,TAS conversions : Add to 4BRZ and 4RBL licence area

In most cases, the nominated Regional/Remote commercial radio licence areas are already adjacent to, or overlap, the licence areas of markets seeking conversion.

There is zero commercial benefit to us serving those sparsely populated isolated areas, but it allows those effected areas to have clear rights and a certain immediate path to find permanent alternative services when they lose their AM reception. It also provides effected small communities and localities the option to easily seek permanent self help FM transmission, with commercial certainty that any re transmission is not temporary ‘out of area’ in nature, and will be fed on a reliable satellite platform.

Toowoomba 4WK Conversion

ACMA conversion policy only allows for conversion in competitive markets to occur in exceptional circumstances.

The proposal would see 4WK (including its existing Dalby FM repeater and Stanthorpe FM repeater) receivable on FM in all major towns within its licence area, with the exception of Warwick. The vast majority of the licence area population would be able to access 4WK via one of
three FM transmitters.

The consultation paper for the 4WK Toowoomba conversion does not contain sufficient background information to demonstrate that exceptional circumstances exist, and that all alternative options have been fully explored.

Possible alternatives not discussed in the paper could include;

A. Co-location on the 4GR 864 kHz Toowoomba mast.
B. Option to reduce mast height and increase ERP (on same or different AM channel) at a new site within ~10 km of Toowoomba.
C. Co-location with the 4AK 1242 kHz Oakey mast on a revised power and channel, combined with the possible closure of the Dalby FM repeater, and possible reduction in power or revised pattern for 963 kHz Warwick to reduce any excessive coverage duplication.

We are surprised a proposal that seems a ‘stretch’ of meeting ACMA planning policy objectives can advance this far in only 4 years, and with limited supporting information in the consultation paper.

We have had one FM site where we lost viable long term tenure years ago, and we’ve been waiting longer in the ACMA planning queue to move to an adjacent site with a near identical coverage footprint. We have another FM site pending that would serve an additional ~8,000 people in our licence area, that’s been in the queue for over 10 years, with no idea when it will be included in a LAP.

We are aware the ACMA has limited planning resources, and rather than expedite a free AM to FM conversion for one Toowoomba broadcaster, we urge the ACMA to ensure wholly unserved communities still waiting on a LAP to facilitate their first commercial radio service are now repositioned in the queue and given the highest planning priority.

Regards

Aaron Jowitt
Managing Director
Rebel Media