16th December, 2016

Draft Variation to Broken Hill Radio LAP
Broadcasting Carriage Policy Section
Australian Communications and Media Authority
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Attn: Nicole Brown

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File Reference: ACMA2009/685

Re: Broadcast Operations response to draft Broken Hill Radio LAP - AM – FM conversion

The Broadcast Operations Super Radio Network (SRN) appreciates the opportunity to lodge a late submission in relation to the abovementioned draft LAP.

SRN is the operator of the two commercial radio licences in the Broken Hill Radio LAP, being 2BH and HILL FM.

As Broken Hill RA1 is a solus licence area with less than 30 per cent overlap with any other licence area, the 2BH or 567 AM Broken Hill transmitter meet the proposed eligibility criteria for an AM–FM conversion. As a consequence an ACMA engineering assessment determined, in it’s preliminary view, technical specifications that would be suitable for the proposed transmitter and that it could operate on the FM frequency 93.3 MHz.

Super Radio Network comments on the relevant Preliminary View are as follows:

As will become evident from the comments below that SRN unfortunately is of the view that it must reject the preliminary view that has been formed and firmly take the position that the specification for the 567 AM Broken Hill transmitter remain as it currently is and not (as proposed) convert to FM.

Background Information

I have incorporated a licence area map for the Broken Hill RA1 area (see below) for reference.

Firstly, in moving forward it is important to confirm the current FM technical specifications:

The site is Radio 2BH AM 61 metre mast at the Super Radio site at Nine Mile road 3 km NW of Broken Hill. The ERP is 4kw omni-directional, 2kw Tx. Further the antenna height is 45 metres agl, bearing 144° TN.

The city of Broken Hill has almost all the residential population of the licence area and is where the current AM and FM transmitter are based but is on the edge of the licence area. There is no population overlap with any other market.
As can be seen from the licence area map below the abovementioned AM and FM transmitters are sited 45km to the western edge and 135km to the eastern edge of the commercial radio RA1 licence area.
The following licence area map provides details of the coverage of the FM in the Broken Hill licence area.

A main feature of the coverage, apart from clarifying how little of the actual licence area is served (a fact that becomes important later in the submission) is that the rural grade FM coverage extends 40km East and West along the main road to the East.

Reasons

There are a number of reasons why SRN wishes to reject the preliminary view and as such the offer to convert the 2BH signal from AM to FM. They are as follows:

Coverage equivalent to the existing AM signal is an important feature of the SRN business model and service delivery in the Broken Hill licence area.

If one were to convert the AM signal to FM and thus retain equity in this rather unique market or licence area “in-fill FM translators” would need to be considered.

To cover the main road to the East of Broken Hill and to maintain FM coverage there is, in the view of SRN and our consultant, a gap in coverage of 100km. While this may not seem significant to the outsider there are no established broadcast sites suitable for FM re-broadcast in this particular gap area. The terrain in the area, and across the licence area in general, is essentially “flat” with no prominent hill or hills suitable to establish a new site.

In order that the “gap” mentioned above might be covered, and the 2HD commercial service coverage is retained, it is our estimate that four in-fill transmitters would be required. And that is just to cover the road to the East of Broken Hill and within the licence area.
To achieve the coverage mentioned above identified above multiple FM frequencies would be required. Whilst this may not seem a significant issue in an area where there is potentially abundant spectrum, it is arguable it is not an efficient use of spectrum. More importantly for SRN in maintaining listeners, driving the roads in question, would require the listener to potentially retune their receiver every 30km or so. As we know from experience a listener is more inclined to switch to a "consistent" service (such as the ABC) if required to continually change radio settings. The roads I am referring to are important in the movement of vehicles to and from the east of the licence area.

This is a critical issue in considering adoption of the AM to FM conversion model.

In addition to the above it is important to consider the population that would be impacted on should the coverage be diminished if a transfer to FM were to proceed.

The ACMA paper identifies 183 people inside the licence area that will not receive the FM signal but who currently receive the AM service. I appreciate this figure is based on ABS Census figures, but flag that it could be dramatically incorrect when considered in the context of a licence area such as Broken Hill. It is the view of SRN that the number impacted on the potential change to FM is higher due to large geographic areas with a low population count and the lack of data showing exactly where in the licence area the population actually lives.

The final issue that must be raised is a pertinent statistical one relating to the radio listening population.

Census data captures where population resides and is (quiet correctly) in planning and control scenarios applied to, in this case, radio licence areas. In general terms over 32% of radio listening occurs in the motor vehicle. In the Broken Hill radio licence area scenario only 30% of the main road is covered by an FM signal whereas almost 100% is and would continue to be covered by AM.

This is an important consideration. The viability of a licence or the services a listener has available to them, particularly in a solus market such as Broken Hill, must not be compromised when changes are being considered. We should only be considering improvements.

In the case of this preliminary view (the view) it is the position of SRN, after careful consideration, that both service viability and listener services would be threatened should the view be adopted.

Summary

As has been stated on a number of occasions previously SRN is of the view that it must reject the preliminary view that has been formed and firmly take the position that the specification for the 567 AM Broken Hill transmitter remain as it currently is and not (as proposed) convert to FM.

Although SRN has taken the position it has in relation to the Broken Hill view, SRN remains very supporting of the Government’s decision in relation to the AM to FM conversion in solus markets and markets where there is a less than 30% population overlap. Broken Hill is a unique market in terms of terrain and coverage and unfortunately presents, in our view after careful consideration, insurmountable issues in terms of coverage equivalence and viability. Unfortunately conversion to FM is not an option as a commercial licence must continue to provide its service to all of its listener constituency.
Should there be any questions in relation to the above please contact Mr Allan Bone on 07 55244497 in the first instance.

Regards,

[Signature]

BILL CARALIS
MANAGING DIRECTOR