Mt Bocoble (Mid West NSW) consultation.

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

I refer the ACMA to our earlier submissions on Mt Bocoble, dated;

i. Mon 28 October 2013, Page 1 & 2
ii. Thu 24 March 2016, Page 1 & 2

The current draft LAP variation discussion paper states “The only changes to the draft instrument released for consultation in 2016 are to replace the carrier frequencies at attachments 2.8 and 2.48 with the carrier frequencies…”

Following the release of the discussion paper, we became aware that the ACMA propose to reduce the protected coverage contour by 6db from 54 db uV/m to 60db uV/m, as a result of likely inference on the newly proposed frequencies within the 54 db uV/m contour. We believe that to be a significant change and downgrade from the larger protected coverage area that formed the basis of the 2016 draft LAP proposal.

We are disappointed the downgrade was not discussed with RM first, and that no provision has been made in this LAP variation to maintain at least the breadth of the 2016 proposed protected coverage area, which may have been able to be achieved easily with an offset 6db increase in ERP.

RM is the incumbent commercial licencee at Mt Bocoble. 2GEE (Real FM Mudgee) secured from the ACMA a licence extension into our market to include Mt Bocoble in 2008. However, from Mt Bocoble (across the 0-300 degree sector) the RM license area still extends at least as far as the 2GEE licence area. Across the majority of that sector the RM licence area extends further than the 2GEE licence area. This dictates that the RM Mt Bocoble services should have equal or higher...
power than the co-sited 2GEE Mt Bocoble service, and be afforded at least the same level of protection. The table below shows the 3 draft LAP variations for RM Mt Bocoble, compared to the specification granted to the newly licenced competitor 2GEE;

<table>
<thead>
<tr>
<th>Draft LAP release</th>
<th>Reference 2GEE Bocoble max ERP within 0-300d dBm</th>
<th>BRZ/RBL Bocoble max ERP within 0-300d dBm</th>
<th>BRZ/RBL max ERP compared to 2GEE</th>
<th>2GEE protection contour uV/m</th>
<th>BRZ/RBL protection contour uV/m</th>
<th>BRZ/RBL protected contour difference compared to 2GEE @ 250W</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>250</td>
<td>150</td>
<td>~2db lower</td>
<td>54</td>
<td>54</td>
<td>~2db lower</td>
</tr>
<tr>
<td>2016</td>
<td>250</td>
<td>100</td>
<td>~4db lower</td>
<td>54</td>
<td>54</td>
<td>~4db lower</td>
</tr>
<tr>
<td>2017</td>
<td>250</td>
<td>100</td>
<td>~4db lower</td>
<td>54</td>
<td>60</td>
<td>~10db lower</td>
</tr>
</tbody>
</table>

A 10db higher net protection level is a significant competitive coverage advantage for 2GEE. The above table is a best case scenario, as the more directional pattern of the BRZ/RBL services produces greater differentials across some sub sectors.

We are concerned that each draft LAP variation has seen a further reduction in the net protected coverage area of the RM services. We appreciate the ACMA is now constrained by competing demands for limited spectrum, but we remind the ACMA our application to serve the mid west region dates back over 12 years, which predates the 2GEE licence area extension application.

**Proposed Solution**

Given the length of time it takes to complete a LAP variation and the shrinking available spectrum pool, we support the ACMA finalising the current draft LAP as is, but we ask that Bocoble then be placed back into the work plan to at least restore the protected coverage area at the next available LAP variation to match the 2016 draft LAP. The easiest way forward at that point would be to increase the transmission power by at least 6db to offset the newly imposed 6db reduction in the protected contour level.

Regards

Aaron Jowitt
Managing Director
Rebel Media