Draft Variations to Swan Hill, Central Western Slopes, Mackay, Gunnedah and Roma Radio LAPs
Broadcasting Carriage Policy Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

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Reference ACMA2009/850

Rebel Media [RM] provides commercial FM radio services (NE-RCRS) 4BRZ [Breeze] and 4RBL [Rebel] to regional areas of New South Wales.

Gunnedah LAP

We object to the ACMA proposal to licence 500w OD translators for 2MO and 2GGG ahead of RM Warrumbungles services. The ACMA discussion paper notes;

“Coonabarabran, which is 98 km from Gunnedah, is located in the Gunnedah RA1 licence area and has a population of 2,567. It is the commercial centre and largest town in the Warrumbungles Shire, which has a population of 9,588. ... The ACMA considers the 2MO and 2GGG in-fill transmitters address a demand for radio services in an area that has been underserved by commercial radio.”

The vast majority of Warrumbungles Shire (in terms of both population base and land area) is solely in the RM commercial radio licence area. It remains unserved today by commercial radio, following a 2MO/2GGG backed objection by CRA to the 2013 draft LAP Warrumbungles specifications for the RM services.

The RM Warrumbungles services would reach more under-served people in our Warrumbungles licence area than those who stand to benefit from the 2MO/2GGG translators. The ACMA should first finalise the RM 2013 draft LAP Warrumbungles specifications.

Coonabarabran urban centre is ‘only just’ within the Gunnedah licence area, with the RM licence area eclipsing Coonabarabran on the North, South and West side of town, less than 0.6 km from the town centre. Some of towns motels, caravan parks, outer residential housing areas, and the town airport are solely in the RM licence area.
The unusual nature of those close town boundaries makes it effectively impossible for wide coverage services from either side of the licence area boundary to adequately cover their market while avoiding overspill back into the neighboring broadcasters market.

The 2MO/2GGG proposal would see ~15% of the suburban grade coverage, and over one third of the rural grade stereo coverage extend up to 20km west and South of Coonabarabran inside the RM licence area. Modelling suggests most of that fortuitous coverage would be interference free, and reach ~300-500 people in the RM licence area.

2MO/2GGG are proposing their services overspill ~20km west/south of Coonabarabran, yet object to RM Warrumbungles services that would unavoidably overspill ~20km east of Coonabarabran.

We are surprised that the ACMA discussion paper does not raise or discuss the 2MO/2GGG
overspill, and that the ACMA saw fit to recently licence S34 drop through spectrum to 2MO/2GGG with no consultation or apparent regard to its overspill and impact on the RM market. We are concerned that ACMA planning practice discriminates against RM in this part of its licence area due to its lower population density and smaller urban centres and localities.

Should the ACMA proceed in finalising the 2MO/2GGG specifications in this variation, it will permanently facilitate 2MO/2GGG fortuitously serving this part of the RM market and potentially allow them to become fortuitously established as the commercial ‘incumbent stations’ if the authority further delays LAP finalisation of the RM Warrumbungles specifications.

That would be unjust, given;

- both the 2MO/2GGG and RM proposals have unavoidable overspill components
- the RM application to the ACMA pre-dates the 2MO/2GGG application to the ACMA, by some years.
- the RM draft LAP variation was released prior to the Gunnedah draft LAP variation, after extensive RPS consultation to minimise RM overspill.
- there will be more people served by the RM Warrumbungles transmitters.

**Recommendations - Gunnedah & RM LAP**

There are two equitable options;

1. The ACMA finalise both the proposed 2MO/2GGG draft LAP specifications and the RM 2013 draft LAP Warrumbungles specifications simultaneously, ensuring both broadcasters are treated equally, able to enter the market at the same time, and adequately able to service their respective target markets without significant in-market coverage compromise. This is the preferred path that is simplest for the regulator (as all planning work has already been done, and both draft LAP’s released) and provides the best outcome for the broadcasters and people within the licence area hoping to adequately receive their licenced broadcasters.

2. Reject the 2MO/2GGG specifications, and establish alternative specifications that reduce their coverage and overspill, while still adequately servicing the target urban centre of Coonabarabran.

We have undertaken modelling to identify suitable alternative specifications for 2MO and 2GGG. We suggest 2MO/2GGG nominally operate at an ERP of 25 watts, an antenna height of 20m, with a practical and cost effective omni-directional antenna pattern, with a nominal LAP site at the
Coonabarabran visitor information centre (ACMA site ID: 140291). This is an established FM facility, co sited with 2SBS-FM. There are alternative town based sites that achieve similar coverage outcomes.

Compared to the 2MO/2GGG draft LAP specifications, we concede there is a loss of rural coverage outside Coonabarabran and within the licence area, but the number of rural people effected would be notably less than the number of rural people left without any commercial service by a flawed proposal being advanced to reduce the 2013 draft LAP RM Warrumbungles specification power levels by a further 3db.

Coverage modelling clearly shows 25w OD is sufficient for 2MO/2GGG to provide blanket suburban grade coverage throughout the target Coonabarabran urban centre, while reducing the extent of overspill.

Regards

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