Rebel Media [RM] is licensee of 4BRZ (Breeze) and 4RBL (Rebel FM). The RM and 8SAT services are in the midst of an ACMA RCEA LAP variation. The licence boundary of all three commercial radio services is 89km from the Young RA1 licence area.

**Equitable Planning Outcomes**

In December 2013 Commercial Radio Australia [CRA], on behalf of Super Network [SN] (owners of 2LF and 2LFF Young), submitted their objection to numerous proposed 8SAT and RM repeaters contained in the draft LAP.

Our interest here is ensuring that commercial licensees are equitably held to the same standard when determining suitable specifications for repeaters to adequately cover a licence area, and while ensuring all reasonable steps to minimise avoidable overspill outside a licence area are taken.

An impartial and equitable assessment of both the RCEA and Young draft LAPS would likely conclude all proposals in both draft LAPs are fair.

However, it is clear that SN are asking the ACMA to require 8SAT and RM to go to extraordinary lengths to minimise overspill of its services, while SN simultaneously push ahead with far more liberal proposed specifications for its Young services.

From studying the CRA/SN RCEA submission, we can determine their proposed planning approach has three key points;

- overspill, even if unavoidable, should not be permitted.
- It is ok to significantly compromise adequate reception within the licence area and leave people without a service, if it reduces overspill.
- The cost of implementation should not be a consideration, and expensive directional patterns (i.e. RFS 902 based arrays) are CRA endorsed for small regional repeaters.
Notably, CRA/SN objections of 8SAT/RM proposals included low power FM services, numerous services that did overspill to a single UCL outside the licence area, and services that already employed directional antenna patterns to minimise overspill. The distance from the licence boundary of the 8SAT and RM proposed repeater sites that SN objected to ranged from 4.5km to 21.5km.

**2LF & 2LFF Cowra, Grenfell and Temora**

The ACMA is proposing 2LF and/or 2LFF repeaters at;

- **Cowra**
  50 watts omnidirectional from Bellevue Hill Lookout sited only 1.2 km from the licence area boundary. A cheap omnidirectional antenna pattern is specified, resulting in ~half the power being directed outside the licence area.

- **Grenfell**
  25 watts omnidirectional from Henry Lawson Way sited only 0.22 km from the licence area boundary. A cheap omnidirectional antenna pattern is specified, with ~one third of the power being directed outside the licence area.

- **Temora**
  25 watts omnidirectional from Burley Griffin Way sited only 2.0 km from the licence area boundary. A cheap omnidirectional pattern is specified, with nearly half the power being directed outside the licence area.

If RM or 8SAT put forward proposals for omnidirectional services a mere 0.2km from our licence area boundary, we could rely on CRA firing off a complaint to the ACMA, following 3-6 months of various consultation extension requests.

CRA are aware that 2LF/2LFF are proposing three FM services with inappropriate omnidirectional antenna patterns, all sited just 0.2 km to 2km from their licence area boundary, with no attempt whatsoever to minimise overspill outside their licence area. Hypocritically, CRA are refusing a request from two member licensees to object to the Young draft LAP, and they are simultaneously refusing to withdraw the CRA RCEA draft LAP submission.

We are concerned that the ACMA appears increasingly wary about progressing RCEA variations for services near our licence area boundary, no doubt aware that CRA,SN or SCA will forcibly complain, no matter how moderate the proposal.

We remind the ACMA that RPS/BCPS on overspill grounds has recently blocked;

- a proposed RM service where only 1% (approx 10km2) of the proposed geographical coverage fell outside its licence area, that was wholly unavoidable. We note modelling shows the overspill from each of these three proposed Young
translators is greater than 10km², and is partially avoidable.

- a proposed RM omni-directional service where <25% of its proposed coverage area fell outside the RM licence area, with no UCL impacted outside the licence area. The ACMA would only consider a directional pattern. The same approach should apply to Young translators where >30% of their proposed coverage area falls outside their licence area but contains no UCL.

We are aware that the Young over spill area is currently lightly populated and does not contain a UCL, but if all commercial broadcasters are to be truly held to the same standards, the Cowra, Grenfell and Temora draft specifications should be reviewed by the ACMA and extensively modified to incorporate directional patterns (with a minimum 12 db front to back ratio) and/or be re-sited to reduce the extent of geographic overspill outside the licence area, even if it partially compromises reception with it.

**2LF Cootamundra & Grenfell**

A recent engineering assessment undertaken by the ACMA concluded signal levels of the 2LF 1350 Young service are below the suburban grade of service in both towns. However, Department of Communications measured field strength mapping for 2LF shows Cootamundra UCL and Grenfell UCL fall wholly within the 5kw DA 1350 kHz 2.5 mV/m contour. A government mapping extract is included as Attachment One.

This suggests the government has earlier verified that Cootamundra and Grenfell already receive an adequate AM signal in excess of the target suburban grade of service, and repeaters are not necessary. We request the ACMA review the purpose and need for these two proposed 2LF FM repeaters.

Kind regards

Aaron Jowitt
Managing Director
Rebel Media
Appendix One

DOC Field Strength Survey 2LF 1350 kHz confirming Cootamundra and Grenfell UCL located within the 2.5 mV/m contour