Kempsey Radio LAP Proposed Variation.

Rebel Media [RM] is licensee of regional commercial radio stations 4BRZ and 4RBL.

Consultation

We apologise for our late submission. We have just found the discussion paper by accident online.

The RM licence area overlaps both the licence area and coverage area of the ACMA proposed 2PQQ and 2WAY translators. We have previously written to the ACMA raising our concerns that the regulator had not consulted with us on an earlier significant Kempsey planning variation, nor the later 2004 specifications for the Section 34 2PQQ North Haven translator.

We express our concern that the ACMA has not consulted with RM on this latest proposed variation and ask the regulator to please consult on all LAP variations that directly effect the RM licence area.

2WAY Translator

The translator by design will allow 2WAY to provide Kendall adequate reception of its licensed community radio service. We note the 2WAY translator request is dated October 2012, and the ACMA's comments that “…signal overspill is considered unavoidable…”

RM is the sole commercial radio licensee for Kendall and does not service the town. Over the last 8 years, we have regularly requested spectrum to adequately serve our Hastings region, including Kendall. The ACMA has raised concerns about overspill, which has proven unavoidable.

We have no issue with the 2WAY proposal itself, but we are frustrated by a planning process that allows a recent application from 2WAY (that also creates unavoidable overspill) to be advanced ahead of long standing RM translator requests.

We ask the pending RM Hastings translators be given immediate ACMA planning priority to allow them to commence serving Kendall in a similar time frame to that being afforded to 2WAY.
2PQQ Translator

Kendall UCL (Urban Centre, Locality) and its environs has a population of nearly 1,000 people, representing one of the largest Hastings UCL’s planned to be serviced by pending RM Hastings services.

Coverage modelling shows the 2PQQ translator providing rural grade stereo overspill to the majority of Kendall township. This is not mentioned or considered in the ACMA discussion paper. The ACMA proposal represents the permanent LAP licensing of yet another commercial FM radio signal fortuitously servicing Kendall.

RM does not serve Kendall, as the ACMA has not yet advanced RM Hastings FM proposals due to its concerns about unavoidable 'rural grade stereo' overspill to urban centres wholly within the adjacent Kempsey RA1 licence area.

The ACMA planning minimum target signal level for Kendall is rural grade stereo (+54 dbuV/m), so 'adequate target grade' coverage is fortuitously achieved by 2PPQ across the majority of a primary RM Hastings UCL that is wholly outside the Kempsey RA1 licence area.

The ACMA planning minimum target signal level for urban centres within the Kempsey RA1 licence area is a higher suburban grade (+66 dbuV/m), so 'adequate target grade' coverage will not occur from RM rural grade signals into any urban centre wholly outside the RM licence area.

In summary, we are concerned that the Kempsey commercial radio services are being permitted by the ACMA to provide 'adequate target grade' unavoidable signal coverage to key population centres solely within the RM market, but RM is not permitted to provide unavoidable signal coverage to key population centres solely within the Kempsey RA1 market, even when the RM signal is below 'adequate target grade' levels.

In the interests of establishing the base for a more balanced planning outcome in the region, we ask the proposed 2PPQ translator not be licensed in the LAP until such time as the ACMA also completes licensing the pending RM Hastings services. We ask the RM Hastings translators be given immediate ACMA planning priority.

Regards

Aaron Jowitt
Director