Draft Variation to Albury and Deniliquin LAPs
Broadcast Planning Section
National Allocations and Licensing Branch
Australian Communications and Media Authority
PO Box 78
BELCONNEN ACT 2616

18th December 2009

Reference: ACMA 2009/715 - Variation of Albury and Deniliquin LAPs

Attention: Mr Christopher Roberts

Thank you for your undated letter, where you indicate that the ACMA has released a draft variation to the LAPs for Albury and Deniliquin. We write to respond on behalf of Albury Wodonga Christian Broadcasters Incorporated (AWCB), which currently broadcasts as 100.7 The Light. AWCB is one of the two broadcasting services which are directly affected by the proposed variation. We believe that we offer a unique and important service as the only radio station dedicated to representing the Christian community in the Albury-Wodonga region.

We respectfully present the following submission with regard to the Albury LAP:

Change of Frequency:

AWCB understands that although we have been operating on Temporary Community Broadcasting Licences (TCBL) on 100.7 MHz that this will not necessarily be the frequency on which a permanent licence is finally issued. Although a change of frequency would represent a significant amount of effort on our behalf, we appreciate the motivation to make more efficient use of the radio spectrum by seeking to provide another full time broadcasting service in the area and understand why there is a consequential frequency change for the proposed community service as the result of this decision.

AWCB will endeavour to co-operate fully with the ACMA as the formal process is undertaken. We will seek to ensure that any subsequent frequency change to our TCBL is accommodated in a professional and timely manner.

Equipment:

The proposal to change frequency will require us to have our main transmitter and exciter returned to the manufacturer for an unknown period to be retuned.
Although we have had some success in retuning our backup exciter to 98.5 MHz, our backup transmitter was less co-operative and is not operational at this time. This transmitter will also require specialist attention to ensure it can broadcast on the new frequency.

While the proposed change of frequency is physically possible, there is a chance that we may have to operate at lower power (15 to 20 Watts) or cease providing our service for a number of weeks while our equipment is recalibrated.

**Variation to Licence Limitations:**

**Current Situation:**

AWCB has been broadcasting fulltime since May 2006. Until we obtain a full community broadcasting licence, our continued operation relies upon the contiguous renewal of temporary licences.

While we are very grateful for the opportunity to continue to operate in this way, the terms under which the licences are issued severely limit our prospects of viability because they prevent us from servicing a large proportion of the Albury-Wodonga Christian community by excluding large residential and commercial areas and reduce our potential sponsorship base and studio location options.

It would be helpful if the licence conditions were similar to those given to the other two local community stations, 2REM and 2RPH. In particular, there are two conditions which continue to impede our progress, namely being limited to placing our transmitter within the current Wodonga RA1 area and a severely limited transmitter power.

**Future Plans:**

In order to improve reception for our listeners and supporters AWCB is planning to move its transmitter to a high site. For several months AWCB has been negotiating with the owners of an existing site, namely GlenMaria - ACMA Site Id 52863.

AWCB would prefer to start broadcasting on any new frequency from this site, rather than commence at Carrols Lane, then move at a later date to GlenMaria. However, we are aware that there may not be enough time and we may have to plan for two stages, ie a frequency change, then site relocation.

We are also in discussions with the State Emergency Service that operates from the tower at that location. We are currently trying to work out how testing would proceed in order to determine if our transmission would affect their receiver sensitivity. Naturally we will obtain ACMA permission before any tests are carried out. We are not in a position to request a change of location until the ACMA agrees to extend the licence area as follows.

**Coverage Area:**

Most of the support for our FM service comes from people who live in the cities of Wodonga and Albury; these people are our primary target audience. Although divided by a state border and the Murray River, Wodonga and Albury do not comprise separate communities. Many people live on one side of the river and work on the other. Furthermore, churches operate across the state borders, with people thinking little of crossing the state border to
attend a worship service. These same people, when asking us why they cannot receive our radio station, find it difficult to understand why we are meant to limit our transmissions at the border.

A comparison of the coverage of the Albury RA1 and RA2 licence areas, ie where other community services are permitted to operate in the region, soon reveals that the Wodonga RA1 area is much smaller.

A number of times this licence area limitation has impeded our efforts to relocate our transmission tower to improve our local reception and prepare to extend our service into other areas. At one time we were offered tower space on One Tree Hill in Albury, another time we were negotiating with the owner of Huon Hill. Although these sites would provide good coverage of our primary target audience, we were unable to proceed with either because they were outside the Wodonga RA1 licence area.

Because we are unable to provide adequate reception to the people who are our primary target, we are most concerned about the prospect of ever providing (even limited) reception to the growing number of supporters and potential listeners who live in the regions surrounding these cities.

Our secondary target and area of interest goes well beyond the urban area of Albury-Wodonga. AWCB seek to be given the opportunity to transmit from the top of a prominent hill, as other FM broadcasting services are free to do. This would be one step to expand our coverage so that we are able to improve reception to both our primary and secondary target audience.

Following is a detailed list which specifies our target audience:

**AWCB Primary Target Audience:**

Wodonga, Albury, West Wodonga, Huon Creek, Bandiana, Bonegilla, Leneva, Killara, Baranduda, Ebden, Lake Hume, Bellbridge, Thurgoona, Table Top, Jindera, Splitters Creek, Barnawartha North, and Indigo Valley.

**AWCB Secondary Target Audience:**

**North East Victoria**, including Rutherglen, Chiltern, Wangaratta, Beechworth, Castle Creek, Yackandandah, Allans Flat, Kergunyah, Kiewa, and Tallangatta.

**NSW - Hume Murray Region**, including Howlong, Corowa, Balldale, Brocklesby, Culcairn, Walla Walla, Gerogery, Holbrook, Mullengandra, and Bethanga.

ACMA appears to use an aggregation of local government boundaries to indicate where the limits of particular broadcasting services end. Therefore, if the above target audience was translated into LGA’s we would include (in order of priority) Wodonga, Albury, Indigo, Greater Hume, Towong, Corowa, and Wangaratta.

We propose that either the Wodonga RA1 area be extended to include the above LGAs, or that a new radio licence area be created. If ACMA is not agreeable to either of these proposals, then AWCB would be amenable to being granted uniformity with the two existing local community stations and having our licence specify the Albury RA2 area.
**Transmitter Power:**

We request that the proposed community broadcasting service be allocated a frequency with sufficient transmitter power to reach the area defined above. If a frequency study finds that this is not possible, we propose that a frequency be found which will allow the proposed community broadcasting service to operate with specifications similar to those of the two community broadcasting services in Albury, 2REM and 2RPH, which are both licensed for 2kW ERP. This would then allow the broadcaster to operate on an equal basis with these other two local community broadcasters. AWCB believe we fill a niche market, not provided by the other two community services. We offer a unique and distinct program, where the content is designed to support and develop the Christian community.

The documentation on page 5 of the explanatory paper accompanying the Draft Variation to the Albury LAP indicates the proposed frequency of 98.5 MHz would allow for the allocation of a licence with an ERP of 500 Watts.

**AWCB request that the new TCBL be issued with a minimum ERP of 500 Watts.**

We further request that the licence specification not require the use of directional antenna, but rather permit the use of vertical or mixed polarity non-directional antenna, subject to the proposed increase in the licence area.

Should the replacement TCBL incorporate (a) the larger area, (b) the power increase and (c) the antenna pattern change, then AWCB would consider that it has received some form of compensation for the burden placed upon it in terms of the finances and human resources needed to undertake the frequency change.

**Adequate Notice:**

We would like to give our listeners a minimum of three months on-air announcements alerting them to any frequency change. A longer timeframe, say six to twelve months, would be better, especially in terms of preparation for our on-air promotional material, letterhead, logo, etc.

**AWCB requests that ACMA specify the planned timeframe before any change of frequency must come into effect. We also formally request that the time between AWCB receiving written notification that a frequency change is to occur and the date by which the frequency change must be implemented will not be less than three calendar months.**

**Number of Community Stations:**

In the Explanatory Paper on page 4 under Background, it states that the 1997 LAP initially made allowances for seven community services to be allocated to the Upper Murray region. It is noted that Schedules two to five of the Proposed Variation to the Albury LAP list ten existing community services, including AWCB. AWCB suggests that, if not already amended, the LAP and the FAP be changed to ensure that there is no future impediment for three permanent community broadcasting services to operate in Albury and Wodonga.

Also, given the ongoing proliferation of low power localised community services, we ask that ACMA consider whether there a need to make allowance for more of that type of service. This may avoid the need for another variation to the LAP in the near future.
Summary:

1. AWCB gives its full support for ACMA to approve the proposed variation in order to accommodate another broadcasting service in the Albury-Wodonga region.

2. AWCB will work with ACMA to co-ordinate the proposed frequency change.

3. AWCB asks ACMA to make the following changes to the licence conditions for the proposed community broadcasting service:
   A. That the licence area be expanded to include the LGAs of Wodonga, Albury, Indigo, Greater Hume, Towong, Corowa, and Wangaratta;
   B. That a frequency be identified with sufficient transmission power to service the proposed area;
   C. That the Transmit Power for future TCBLS be a minimum of 500 Watts ERP; and
   D. That future TCBLS permit the use of a non-directional antenna.

4. AWCB further propose that:
   A. A timeline be specified for any change of frequency;
   B. Notice of at least 3 months be given to allow for advertising, planning and implementation of any frequency change; and
   C. The number of community services in the Albury LAP be adjusted to allow for increased broadcasting by community groups.

Attached are letters supporting this submission by the following:

Mrs. Sussan Ley MP
Member for Farrer,

Rev. Mark Habgood
Chairman of the Albury Christian Ministry Fellowship,

Mrs. Sophie Mirabella MP
Member for Indi,

Rev. Jonathan Stark
Chairman of the Wodonga Christian Ministers Fellowship,

Mr. Greg Aplin MP
Member for Albury,

and

Cr. Denise Osborne
Mayor of Greater Hume Shire Council,

Rev. Paul Potter
Minister of the River Community Church.

Mr. Les Tomich
General Manager of the City of Albury,

Cr. Mark Byatt
Mayor of the City of Wodonga,

Mr. Bruce Corcoran
General Manager of Corowa Shire Council
Thank you again for the opportunity to present our submission. Should you have any queries, please contact the Station Manager, Stephen McDonald by telephone on 0421 798 205 or via email at manager@thelight.org.au.

On behalf of Albury Wodonga Christian Broadcasters Incorporated:

[Signatures]

Neil McDonald  
President

David James  
Vice President

Tanya Bergemier  
Secretary

Stephen McDonald  
Station Manager
TO WHOM IT MAY CONCERN

I am pleased to write this letter in support of the Albury Wodonga Christian Broadcasters Incorporated (AWCB) and their submission to the Australian Communications and Media Authority (ACMA).

The AWCB is an independent incorporated association which operates 100.7 The Light, a community radio service for the Christian community and they seek to have changes made to the Albury Local Area Plan (LAP) to increase their licence area and transmission power.

The establishment of an increased presence of AWCB will benefit the local and wider community and will encourage the Christian faith through Bible teaching and quality Christian music.

I am happy to support AWCB’s submission to increase the broadcast area of the Wodonga community broadcasting licence to include the City of Albury, Greater Hume Shire, Corowa Shire, Indigo Shire and the City of Wangaratta and the allocation of a frequency with the effective radiated power to service this area.

I highly recommend this submission by AWCB.

Yours sincerely

[Signature]

SUSSAN LEY MP
Federal Member for Farrer
18 December 2009

Broadcast Planning Section
Australian Communications and Media Authority
PO Box 78
BELCONNEN ACT 2616

Dear Sir/Madam,

I write in support of Albury Wodonga Christian Broadcasters Incorporated (AWCB) which operates 100.7 FM The Light, a Christian community radio station which is located in my electorate.

AWCBS have made a submission to the Australian Communications and Media Authority regarding changes to the Albury Local Area Plan, as they seek to increase their licence area and transmission power.

AWCB wish to increase their broadcast area from Wodonga to also cover local government areas: City of Albury, Indigo Shire, Greater Hume Shire, Towong Shire, Corowa Shire and the City of Wangaratta.

As the only dedicated Christian broadcaster in this area they are uniquely situated to expand their service to the surrounding area. Expanding the broadcast of AWCB will benefit our local community and provide diversity in radio broadcasting.

I support AWCB’s application and ask ACMA to approve the necessary changes to the Albury Local Area Plan to increase the coverage of this valuable broadcasting service.

Yours Sincerely,

Sophie Mirabella

SOPHIE MIRABELLA MP
FEDERAL MEMBER FOR INDI
10 December 2009

To Whom It May Concern

I am writing to provide my support for the submission by Albury Wodonga Christian Broadcasters Incorporated (AWCB) to the Australian Communications and Media Authority (ACMA) to increase their licence area and transmission power to include areas of southern NSW.

AWCB is an independent incorporated association which operates 100.7 The Light, a community radio service for the Christian community in Wodonga, Victoria. In November 2005 ACMA created a community broadcasting licence for Wodonga and issued a Temporary Community Broadcasting Licence (TCBL) on 100.7 FM limited to 200 watts to AWCB. Broadcasts commenced in May 2006 and continue to operate 24 hours/day, 7 days/week on the temporary licence.

The current boundaries of the AWCB licence area do not allow transmission into Albury and also restrict options for locating a studio and transmitter site. The AWCB's current site was chosen when they held an AM licence, however, the characteristics of FM transmission are different and a site on a hill would greatly increase the effectiveness of their transmission. Due to the restrictions on their current licence they cannot pursue an offer of a free tower space on One Tree Hill in Albury.

I strongly support this submission by the AWCB and trust it will meet with approval.

Yours sincerely

[Signature]

Greg Aplin MP
Member for Albury
Shadow Minister for Fair Trading

Address: 612 Dean Street (PO Box 561) Albury NSW 2640 Tel: (02) 6021 3042 Fax: (02) 6021 8884
Email: albury@parliament.nsw.gov.au
TO WHOM IT MAY CONCERN

It has been brought to my attention that the Albury Wodonga Christian Broadcasters Incorporated is seeking to increase their license area and transmission power so as to provide a service to a wider area which would allow their broadcasts to be heard by an increased number of residents, including communities across the Greater Hume Shire.

On behalf of our Shire residents and their Council, I write to fully support the submission being put to your Authority and endorse the proposal which would see an increase of the broadcast area of the Wodonga community broadcasting licence to include not only our Shire but also Corowa Shire, the City of Albury, Indigo Shire, Towong Shire and the City of Wangaratta and the allocation of a frequency with the effective radiated power to service this area.

A perusal of the most recent census results will confirm that a substantial number of our community members are of the Christian faith. The long-running drought of the past 7 or so years has impacted on large numbers of our rural population and the provision of this service would be of benefit to this and our aging community who do not have access to public transport facilities.

Your favourable consideration of the submission of the Albury Wodonga Christian Broadcasters Incorporated is requested.

Councillor Denise Osborne
Mayor
GREATER HUME SHIRE COUNCIL

8 December 2009
8 December 2009

Enquiries: Fiona Keeble
Reference: P90.0013 OUTR09/3260D8E0

Australian Communications and Media Authority

Dear Sir / Madam

Support for submission by Albury Wodonga Christian Broadcasters (AWCB) to Australian Communications and Media Authority (ACMA)

I am pleased to write in support of the above submission from the AWCB to the ACMA. Council supports the request by the AWCB regarding changes to the Albury Local Area Plan (LAP) that would increase the licence area and transmission power for the community radio service, 100.7 The Light.

As you would be aware the AWCB has operated a community radio station on a temporary licence since May 2006, providing a 24 hours a day, seven days a week service. This service is supported by community members from Wodonga and surrounding local government areas, and is a valued service in meeting the needs of our diverse community.

I understand that ACMA is presently reviewing aspects of the Albury LAP in order to extend the ABC News Radio Network. The extension of such services is welcomed by Wodonga residents as is the support for local community radio such as 100.7 the Light.

Council urges ACMA to support the application by the Albury Wodonga Christian Broadcasters to increase its broadcast area so as to include outlying areas of Wodonga City, as well as the surrounding council areas from north east Victoria and southern NSW.

Yours sincerely

[Signature]

Cr Mark Byatt
Mayor
Thursday 17th December 2009

To Whom It May Concern,

SUBJECT: ALBURY WODONGA CHRISTIAN BROADCASTERS

It is a pleasure to write this letter in support of the submission being made by the Albury Wodonga Christian Broadcasters to extend their license which would include coverage of the Corowa Shire area.

More than 77% of the Corowa Shire population has a Christianity religious affiliation (ABS Census 2006).

An increase in the license coverage area and transmission power would provide Corowa Shire residents with local access to a radio station which enhances their Christian beliefs.

The Corowa Shire community have a low socio-economic status compared to State and National averages. This has been further heightened due to the ongoing drought and downturn of our two largest sectors. During times such as this, it is important that people have the opportunity to fulfil their beliefs and needs.

We would like to wish Albury Wodonga Christian Broadcasters all the best with their application.

Yours Faithfully

Bruce Corcoran
General Manager
Mr C. Roberts  
Broadcast Planning Division  
National Allocations and Licensing Branch  
Australian Communications and Media Authority  

18 December 2009  

Dear Mr Roberts  

As Chairman of the Albury Minister’s Fellowship, I write to support Albury Wodonga Christian Broadcasters and their submission to increase the licence area and transmission power of their licence.  

100.7 The Light is a valuable encouragement to the Christian community by providing Christian teaching and music. Those who are able to receive their broadcasts are well provided for, but AWCB’s licence does not currently provide for this service to be available to residents of Albury and the surrounding areas.  

On behalf of the churches of Albury, I fully support AWCB’s efforts to make this service available to people outside Wodonga and ask ACMA to increase their licence area to include Albury and surrounding areas and to increase their transmission power to make this possible.  

Yours Sincerely,  

[Signature]  

Pastor Mark Habgood.  

Chairman.  

Albury Christian Ministry Fellowship
To whom it may concern,

As Chairman of the Wodonga Minister’s Fellowship we recognise and support Albury Wodonga Christian Broadcasters in their service to the Christian community in Albury Wodonga.

They play an important role in connecting and encouraging the Christian community and for this we are grateful. Members of the congregation represented within the Wodonga Minister’s Fellowship live and work in Wodonga, Albury, Lavington and Thunghuna, Beechworth, Barnawartha and Chiltern. We support the application to make this station available to these communities and to people living outside the urban area of Albury Wodonga.

We trust and pray that their good work will not only continue but grow in the years to come.

Yours sincerely,

Rev Jonathan Stark
Chairman of the Wodonga Minister’s Fellowship

Behold, how good and how pleasant it is for brethren to dwell together in unity!
- Psalm 133:1
8.12.2009

To Whom It May Concern

I write to support the application by Albury-Wodonga Christian Broadcasters to extend their broadcasting range to include the Albury area.

Currently the Christian community in Albury suffers because we have no specialised broadcast (or narrowcast) service to meet our needs.

Albury has a significant population interested in the Christian life perspective, music with a Christian message and events going on in the Christian community, including special events of particular churches as well as events designed for an ecumenical participation. For example, just this Christmas our church held a Traditional Carols Service last Thursday for people wanting a good old sing in an air-conditioned venue. Being able to alert people through the medium of radio narrowcast to the Christian community would have assisted those who were interested to discover this service for their enjoyment. General media are either inadequate or too expensive for this purpose. Albury North Anglican similarly have a Christmas Tree festival this coming weekend, and City Central Church have a Christmas play happening the weekend after. While they can be advertised in church bulletins etc. there are many people with a keen interest in them who do not attend any church on a regular basis. Christian radio would greatly assist in the networking for these people and help them satisfy their spiritual needs and interests which for them are oriented by a Christian belief and interest.

For these reasons I believe the extension of the license for Albury-Wodonga Christian Broadcasters will assist in the welfare of the people of Albury and contribute positively to the enhancement of our community. Albury-Wodonga Christian Broadcasters have a good standing in the Christian community and are trusted by both the Christian organisations of this city as well as people who have heard and used their services beyond formal church affiliation.

Yours Sincerely,

Paul Potter
Pastor