Digital Television Licensing Section
Australian Communications and Media Authority
PO Box 78
BELCONNEN
ACT 2616

20 June 2011

Submission to
Draft Licence Area Plans – Omnibus (Community Television) Variation 2011
ACMA2010/188-17

C31 Melbourne welcomes the proposed variation to the Licence Area Plan for the Melbourne
TV1 licence area.

We note, however, that whilst the draft LAP variation covers the main transmission site at Mt
Dandenong, it does not include the translator service at the Como Centre site. We therefore
propose the following changes to Schedule 3:

1. Section (b) should delete Attachment 6.2 of the principle instrument and replace it
   with a new Attachment 6.2 taking into account the parameters specified in the
   apparatus licence for the digital translator (Licence Number 1922137).

2. In section (a), the new Schedule One should be changed to reflect that the channel for
   the South Yarra service covered under Attachment 6.2 would be 66 rather than 64.
   (This would also be an appropriate time to update other information in Schedule One
   to reflect that the call sign of the community television services is MGV and the status
   of the two channels is “Licensed” rather than “Available”.)

3. We would also like the ACMA to consider allocating the currently unused channel 66
   at the Safety Beach site for a further translator service. We are aware that this
   allocation would only be until 31st December 2013; however we believe that it may be
   possible to implement a short-term solution at this site which would enable the
   community television station to reach an area of its community of interest which it
   cannot currently service.

C31 is committed to reaching as much of its community of interest as possible. This serves
the community by giving them the option of viewing the diverse range of local programming
broadcast; which in turn can provide them with the incentive to actively participate in the
station. Maintaining and expanding our retransmission services as the station transitions to
digital only broadcasting is a key factor in ensuring community engagement.

Yours sincerely,

Richard McLelland
General Manager