Dear Planning Officer,

Thank you for the opportunity to provide comment on the proposed LAP for 1323 5DN in the Adelaide License Area Plan.

8SAT has previously advised ACMA about our concern that the Adelaide License Area Plan (LAP) overspills into the 8SAT LAP on both AM and FM Analogue services. The ACMA report on overspill for 1323 5DN verifies our concerns about the technical specifications of the Adelaide plan.

Currently the specification for all Adelaide FM and AM commercial services including 1323 overspills into 8SAT license areas at greater than .5mV/m on AM or 54 dBu on FM calculations. In our letter to ACMA of March 2005 we highlighted the field strengths of Adelaide FM services overspilling into urban centres at Kingscote, Ardrossan and Kapunda at urban grade. We advise that ACMA should not allow overspill unless it is prepared to offer 8SAT commensurate overspill based on geographical area or population percentage of overspill.

8SAT also notes ACMA’s overspill numbers by people measurement are based on percentage of 8SAT total license numbers not on the overspill to 8SAT adjacent areas or local retransmissions. Clearly the 135,000 people that live in 8SATs license area in the Northern Territory, News South Wales, Victoria and Remote Northern South Australia should not be considered when setting technical specifications for the Adelaide LAP. 8SAT advises that there are four transmitters affected by the engineering specification proposed by 1323 5DN. These are the lower Mid North (99.5 MHz), the Yorke Pensinsula (90.9 MHz & 98.9 MHz) and Kingscote (95.9 MHz). The population of these coverage areas in the 8SAT license is 24,000 people.

The population of overspill by the proposed 1323 5DN specification as a percentage of the total population of the coverage of these transmitters is

**Existing Specification for 1323 5DN**

- 1000 people affected in 8SAT
- 4.2% of population to adjacent 8SAT transmitters

**3.3 kW**

- 3180 people affected in 8SAT
- 13% of population to adjacent 8SAT transmitters

**5 kW**

- 7632 people affected in 8SAT
- 31.8% of population to adjacent 8SAT transmitters
10 kW
12879 people affected in 8SAT
53.7% of population to adjacent 8SAT transmitters

ACMA has previously advised 8SAT that when conducting planning for licenses that may affect adjacent areas, that ACMA prefers to limit overspill and has regarded the .5mV/m or the 54 dBu contour to the nearest urban centre as the determining factor when considering 8SAT’s variation of license to the adjacent Adelaide plan in 8SAT 2005 LAP variation.

8SAT does not support any further overspill from the 1323 5DN transmitter given the massive affect that this would have on the adjacent 8SAT coverage areas. However, ACMA might consider the licensee of 1323 5DNs request if the licensee is willing to offer 8SAT a quip pro on percentage of population. A variation for 1323 5DN of 3.3 kW would provide 8SAT with legitimate license overspill into the Adelaide plan of 13% of the population of the Adelaide LAP area at 60 dBu urban grade.

We are happy to provide further comment as requested.

Regards

Wayne Phillips
Chairman
&
John McDonnell
Broadcasting Advisor