2 February 2006

Revised Draft LAP Variation

ACMA
PO Box 78
BELCONNEN ACT 2616

Attention: Stirling Findlay

Dear Stirling

RWWA RESPONSE TO REVISED DRAFT VARIATION TO PERTH RADIO LAP (ACMA Reference: PF2005/1233)

Racing and Wagering Western Australia (RWWA) offers the following comments on the ACMA Draft Variation to the Perth Radio Licence Area Plan (December 2005).

Though we were disappointed that the “Preliminary View – Perth HPON Services” decided to reserve the vacant AM frequencies in Perth (927 kHz and 1170 kHz) for future use by digital (DRM) regional radio services in the south west of WA, we understand the reasoning for the decision.

The last review has reversed the preliminary view from the September 2004 draft LAP variation that the vacant AM frequency of 1170 kHz be made available for an HPON service and also effectively rejected RWWA’s request to the ACMA (September 2005) for the 927 kHz frequency to be made available for an HPON service in Perth.

If ACMA were to change the preliminary view and the 927 kHz and/or the 1170 kHz frequency became available for an HPON service, we would still be interested in bidding for an HPON licence.

Without an additional HPON service for Perth we are left with inadequate coverage of our service area from our existing transmission site. Our coverage is particularly poor in the northern suburbs of our licence area.

We have examined a range of currently available options for improving our coverage, but none (other than a separate HPON service) offers a viable solution.
Our view is that in the medium term, (given the unavailability of VHF-FM frequencies in Perth due to the Band II TV services in Bunbury), the solution that best meets our needs for improved coverage is for a digital radio service using the Eureka 147 DAB standard. We consider that HPON services such as RWWA's Racing Radio are particularly suited to digital broadcasting as digital broadcasting has the facility to include the audio programming and the data services that would be of particular interests to our listeners.

We also believe that HPON services should be included in the planning of spectrum for the first phase of digital services in the state capital cities and we will be writing to the Minister for Communications, Information Technology and the Arts requesting that this take place.

Yours sincerely

[Signature]

Ken Thompson
Chief Engineer,
Racing Radio Network.