3rd February 2006

Revised Draft LAP Variation – Perth
Australian Communications and Media Authority
PO Box 34
BELCONNEN ACT 2616

Dear Sir

RE: Submission on Draft LAP Variation for Perth Radio – File Reference - PF2005/1233

The draft variation for the Perth Radio Licence Area Plan proposes changes to the technical specifications for the 6iX FM translator at Wanneroo, to improve the coverage of commercial radio service 6iX in parts of the commercial radio licence area currently underserved by either the main AM transmitter for the service or its FM translator located at Wanneroo.

The AM service operates on 1080 kHz at 2000 watts from Belmont; it is supplemented by two FM translators (both) operating on 105.7 MHz from Rockingham and Wanneroo.

The Wanneroo FM Translator

The original technical specification for the Wanneroo FM translator was planned to provide a directional radiation pattern with 4,000 watts (4 kW) to parts of the areas west, northwest and north of the FM transmitter site at Wanneroo and limited to a maximum effective radiated power of 40 watts to the southeast, south and southwest of the transmitter.

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This radiation pattern was found to be impractical to implement because of the high “front-to-back” ratio (4,000:40 watts ERP) specified in its directional radiation pattern.

Present Coverage is Inadequate

A survey of the coverage of the 6IX commercial radio services within its licence area, shows that indoor reception of the 6IX AM service is inadequate at the following test sites:

Armadale
Whitfords
Warwick
Scarborough
Hilarys
Marmion, and
North Beach

The survey also shows that the indoor reception of the 6IX commercial radio service, within its licence area, from the Wanneroo FM translator site is inadequate at:

Armadale
Gosnells
Whitfords
Warwick, and
Scarborough

The survey also shows that the existing radiation pattern for the 6IX AM service is inadequate for indoor reception of the service in all communities north of North Beach where the AM suburban grade of service crosses the coast.
Additionally, a number of communities in that area do not receive an adequate service from the Wanneroo FM translator, these are with a maximum permitted ERP of 40 watts in their direction.

Residents in the areas north of North Beach must rely on the 6IX FM translator at Wanneroo for their commercial radio service.

ACMA has recognised the need to improve coverage of these areas, served by the Wanneroo FM translator, and has issued the draft variation of the Perth Licence Area Plan to improve the coverage for 6IX in the those parts of the licence area between the FM translator site and Scarborough to the south and west of the Wanneroo FM translator site (including Warwick, Whitfords, Scarborough, Hilarys, Marmion and North Beach).

Proposed Technical Specifications for the Wanneroo Translator

The proposed changes to the technical specifications for the Wanneroo FM translator improve the radiation pattern for this transmitter and provide greater signal strength in the main areas of concern, namely Warwick, Whitfords, Scarborough, Hilarys, Marmion, and North Beach.

According to ACMA data, the increase in ERP to 2,000 watts towards Hilarys and 1,000 watts towards Marmion, together with a minimum ERP of 400 watts towards Scarborough and 160 watts to the south of Wanneroo, will provide a more adequate service for 6IX to approximately 177,000 people (13.2% of the population within the Perth Licence Area).
Anything less than the increased ERP levels proposed for the new directional radiation pattern for the Wanneroo FM translator will result in 6iX not being able to provide an adequate commercial radio service to these residents within the 6iX licence area.

In practice, the proposed new technical specifications for the 6iX FM translator at Wanneroo will permit the licensee to operate the translator much closer to, but still NOT at its full authorised ERP of 4,000 watts.

Therefore, we seek an increase in the maximum permitted ERP in the sector 135°T – 195°T to 400 watts ERP. This will facilitate installation of an economically available and practical implementation of the directional FM transmitting antenna required for Wanneroo. The proposal to limit the ERP in this sector to 160 watts ERP makes it much more difficult, if not impractical, to source an FM transmitting antenna with sufficient “front-to-back” ratio to meet the proposed specification, and is likely to result in 6iX not being able to operate at the full 4,000 watts ERP necessary to proved adequate coverage from the Wanneroo translator, in order to maintain 160 watts maximum ERP in the restricted sector.

Any proposals to reduce the ERP in any direction for this FM translator below the levels proposed in ACMA draft variation to the Perth LAP will result in lack of adequate coverage for significant areas (13.2% of the population) within the 6iX licence area.

**Interference between translators sharing the same frequency**

In acknowledging that there will be large areas of interference between the Rockingham and Wanneroo FM translators operating on the same frequency and polarisation, the predicted areas of mutual interference lie within areas of adequate coverage by the 6iX AM transmission.
Summary

Radio Perth Pty Ltd (operators of 6iX) is committed to improving the coverage of the 6iX commercial radio service within its licence area.

To this end, we believe more power is required from the Wanneroo FM translator to provide an adequate level of service in all areas to the south, southwest and west of the Wanneroo translator site.

We believe that with the maximum ERP in the sector 135°T – 195°T increased to 400 watts ERP, along with the other ERP levels specified in the draft variation to the Perth Commercial Radio Licence Area (ref. PF2005/1233) are the minimum ERP levels required to provide an improvement in coverage to a significant proportion of the listeners in these areas of the 6iX licence area.

Therefore, this draft variation to the Perth Commercial Radio Licence Area (including our proposal to increase the minimum ERP to 400 watts) should be approved and implemented at the earliest opportunity.

Yours faithfully

Kevin James Blyton
Managing Director
Radio Perth Pty Ltd