Dear Sir

Larrakia TV wishes to make a submission to the proposal outlined in the documentation referring to Draft Variation to Licence Area Plan for Darwin and Katherine Television and Radio – No. 1 of 2011 and Draft Area Licence Plan – Darwin Television.

Larrakia TV acknowledges the detail as outlined in the Explanatory paper and is largely in agreement with the Preliminary view 1 – Television.

The draft variation fits with Larrakia TV's Charter and is in line with Broadcasting Service Act 18(1) a "Special Interest Group". This variation will allow us to continue to meet our target objectives.

The Charter of Larrakia TV requires that it targets Indigenous Australia broadcast programs and content to provide Indigenous programming and through its many platforms, ensuring that Indigenous stories are told and Indigenous issues are raised. Larrakia TV achieves this by being wholly Indigenous owned and controlled, focusing on Indigenous employment and training in the digital television broadcasting industry and by recruiting Indigenous talent and working with Indigenous groups, Indigenous communities and the national Indigenous broadcasting sector to increase Indigenous television programming and content.

Larrakia TVs role as the only Indigenous television broadcaster in Darwin providing Indigenous content and programming requires working with Aboriginal communities, government and non-government departments and also as an emergency service broadcaster working with the NT Police and Emergency Services, NT Health and Housing, Aboriginal interpreter services, and numerous Indigenous and essential service providers.
Larrakia TV understands that while the Variation to the Licence Area Plan for Darwin Television addresses the changing scope of digital television for Australian television as a whole, a priority question for Larrakia TV is the guaranteed ability to broadcast to our target group – Indigenous communities.

In this context, Larrakia TV wishes to obtain the assurance of ACMA that the draft Variation will include the operation of the Larrakia TV service from any future ‘in-fill’ location established to ensure improved reception for television operators.

While Larrakia TV acknowledges the ACMA proposal to vary the technical specifications of the open narrowcasting television service to Darwin to operate on 585.5MHz (Ch 36) from Broadcast Site Section 4456 (100) Deloraine Road Berrimah with a maximum ERP of 85kW with a DA radiation pattern, a separate letter has been written to the Digital Television Licensing Section of ACMA to consider an alternative channel, Channel 35. The location and power levels suggested are fully supported by Larrakia TV.

Larrakia TV believes that the Variation to the Licence Area Plan for Darwin Television provides valuable opportunities to establish its long term goals and is willing to play a role in working with ACMA to help create sustainable, long-term television broadcasting solutions in the best interests of Indigenous Australians. Larrakia TV is built on a vision for the future of Indigenous television broadcasting from Darwin primarily to the Indigenous community to provide sustainable economic benefits that will assist in improving the lives of Indigenous people and also create greater awareness and understanding of the unique cultural, social, traditional and contentious issues relative to Aboriginal and Torres Strait Islander Australians.

Yours sincerely

Dr Donna Odegaard
CEO
Larrakia TV

13 January 2012