The Planning Officer
Draft LAP Variation – Gympie Radio
Allocations Administration Section
Australian Communications & Media Authority
P.O. Box 78
BELCONNEN ACT 2616

Dear Sir,

RE: Proposed Changes to Radio Services in the Gympie Area QLD;
Submission by Macquarie Regional Radioworks.

I write on behalf of Macquarie Regional Radioworks, the operator of Sunshine Coast commercial radio broadcasting licences 4SSS and 4SEE, in response to the ACMA’s invitation for submissions in relation to its proposed changes to commercial and national radio services in the Gympie Licence Area, announced on the 28th September 2007.

The ACMA will be aware that the Doonan translators for Gympie commercial radio services 4GY and 4NNN were the subject of complaint by this company in February 2006. A subsequent response from the Chair of the ACMA, Mr Chris Chapman, confirmed the basis of the complaints, focussed on unplanned and unlicensed operation of broadcasting apparatus at the Doonan site.

This company appreciates that the current round of LAP variation proposals in part addresses the problems reported in 2006. Macquarie Regional Radioworks wishes to comment on the present proposals as follows.

4GY Translator – Doonan

In February 2006 this company reported to the ACMA that the licensee of 4GY was operating a translator on the FM broadcasting band without an issued apparatus licence. Moreover, it had been installed at a site different to that nominally earmarked for its associated s.39 licence and all other commercial radio translators for that region, at the 7TV Facility Sunrise Road Tewantin. The site at Doonan was further south and substantially higher than the nominal translator site. MRRW expressed its concern about the incidence of overspill beyond the 4GY licence area boundary into the Sunshine Coast radio Licence Area.

Agreement was reached in late 2006 on a new technical specification designed to provide adequate coverage to the southern portions of the Gympie licence area proven to have AM reception deficiencies, while minimising overspill to the greater Sunshine Coast Licence Area. Primarily, this involved
the re-alignment of the directional transmitting antenna from due south to north-northeast in satisfaction of the constraints imposed by that agreed ACMA Technical Specification, no. 1132363.

I am pleased to report that recent checks of the Doonan site have confirmed that the antenna system has now been re-aligned in accordance with the above technical specification. We thank the ACMA for its work in regard to this matter.

4NNN Mt Wolvi

MRRW has conducted modelling assessment of the proposed change to the antenna height and pattern of the main 4NNN service at Mt Wolvi.

It is interesting to note that the original Technical Specification for Mt Wolvi (TS004976) involved a 5kW directional pattern assuming an antenna directed to approx 320° True, with a reduction of 10dB toward Noosa and the Sunshine Coast.

This compares with the actual use of a side-mount antenna which has been operating for at least the last 6 years directed, not to 320° True, but to approx 260° True – toward Gympie. Consequently, the actual radiated power toward Noosa and the Sunshine Coast has not been 500W ERP, but in fact 4dB higher, or approx. 1,250W ERP, taking the antenna’s HRP pattern on a steel tower into account.

Coverage analysis comparison shows that 4NNN’s proposed signal strengths between Noosa and the Gympie licence area southern boundary at Coolum will increase by an average of 5dB on the present service, due to increased power and antenna height. At Coolum this will result in a service area boundary signal average of 66dBuV/m. This is a suburban-grade of coverage; Sunshine Coast urban centres south of Coolum to Maroochydore would receive levels above 60dBuV/m – well above the ACMA’s own limit of 54dBuV/m for overspill into adjacent population areas.

It was exactly for this reason that the ABA originally prescribed the limitation of the southward power of the Mt Wolvi service to 500W ERP. It was also for this reason that the ABA chose to allocate properly engineered, localised translators for the Gympie services in the southern section of its licence area. Coverage of the present Sunshine Coast HOT FM translator from Sunrise Road Tewantin proves that the same translator specification would be adequate to cover all Gympie area population centres down to Coolum, with much lesser overspill than proposed from Mt Wolvi.

Therefore, MRRW would welcome a chance to urgently examine any modelling analysis conducted by the ACMA on the expected changes to coverage resulting from the proposed changes at Mt Wolvi.

In conclusion it must be said that the ACMA does appear to have made considerable effort with the Gympie applicant to juggle the difficult question of adequate coverage versus overspill – there is no doubt that the 4NNN service has been targeted at the population centres as far southward from Noosa as possible; the broadcast service now emanates from studios at
Maroochydore and has little if any synergies with the Town of Gympie and areas further north.

Focus must be kept on the fact that this is a Gympie Licence area service, not a combined Greater Sunshine Coast licence. Macquarie Radioworks hereby seeks to reserve its right to closely monitor the overspill created by the change of technical conditions and to lodge an objection at any time hereafter if such overspill exceeds the levels prescribed in planning parameters traditionally used by the ACMA.

Should you have data available relating to your modelling analysis or should you have any other matters you wish to discuss relating to this submission, please contact the MRRW Group Engineering Manager Mr Jim Vasey on 07 5591 5000.

Yours sincerely,

[Signature]

Nick Scott,
Group General Manager Southeast Queensland
Macquarie Regional Radioworks

30th October 2007.

CC:
Mr John Williams – SCRC
Mr Jim Vasey – MRRW Engineering

Submitted by email to: lapvariation@acma.gov.au