Mr Chris Chapman  
Chairman  
Australian Communications and Media Authority (ACMA)  
Level 15 Tower 1, Darling Park  
201 Sussex Street  
SYDNEY NSW 2000  
CC: Ms Jonquii Ritter, Executive Manager National Licensing and Allocations Branch  
Ms Phyllis Fong, Manager Proactive Advice and Information Section  
Mr Christopher Roberts, Manager Allocations Administration Section  
Dear Mr Chapman  
Channels for ABC Radio Services in Victoria and Queensland  
This letter is written to express the concern of the Community Broadcasting Association of Australia (CBAA) at proposals of the Australian Communications and Media Authority (ACMA) to change the frequencies of community radio stations in the Bendigo, Colac and Geelong areas of Victoria and the Townsville area of Queensland.  
As a Community station the committee at Mount Isa Christian Broadcasters Assn are concerned that decisions have been made which have disadvantaged community stations which serve a vital purpose in the community.
There did not seem any consultation process to have addressed this problem of a shortage of frequencies in a licence area.

There also seems to have been little investigation as to the advantages of disadvantages of the proposed move and there certainly seems to have been no offer of compensation re the costs that the station would incur with the changes that would have to be addressed.

A recent survey by McNair and associates found that Community radio stations serve a niche market of community listeners and nothing replaces this. To change frequencies means that the listeners would be totally disadvantaged and also the local content of the community station would no longer be there, but be replaced by news that is packaged and regurgitated through channels that are not sympathetic to the local community needs.

The technical and human resources required to undertake such a change, the costs of re-branding, and the impacts on the continuity of audience and sponsorship cannot be underestimated. The process of public comment initiated by ACMA is also a rapid one: community radio stations will want to consult properly with their communities and, in volunteer-run organisations, this may take more time than allowed by the current end date of 19 September 2008.

As a member of the CBAA, we join with them in protesting that the key policy issue for the Association, is that a number of community radio stations have been selected to surrender their frequency rather than all sectors being invited to contribute solutions to a licence area planning issue. The current process gives the appearance that community broadcasters are not being treated as an equal among all sectors.

Following a wider review – and the examination of options relating to the commercial, community, and national broadcasting sectors – should a community service be required to change frequency as a final option, these conditions must be met:

1. That the frequency allocated by ACMA is appropriate to each licensee’s needs. In other words, it will have the power and range to broadcast to and be received by all in its licence area. In addition there should be no technical interference from or to the licensee’s signals, thus ensuring the community broadcasters can still fulfil their community interest provisions under the Act.

2. On behalf of the potentially affected stations, the CBAA requires a future-proof guarantee by ACMA that if a frequency allocated to each is appropriate now it will remain so in future ACMA planning and no other service can commence which could technically impact on the licensee.

3. A nominated organisation will be legally responsible for rapidly rectifying any future interference to, or from, the licensees’ signals at no cost to the licensee.
4. The Federal Government would determine a funding allocation for any community radio station affected by ACMA decisions on frequency changes to enable the station to:

   Cover costs for technical and other resources to facilitate frequency change.

   Cover resource costs of re-branding all station signage including direction signs, stationery, logos and other collateral; re-branding promotion, through various media channels, to the community (in multiple languages where required); website content and any other administration involving the frequency change.

   Cover all human resource costs in excess of normal station operations, to facilitate the above.

The CBAA and ourselves are deeply concerned at this proposal, which appears to single out the community radio sector to effect a solution to a LAP issue identified by ACMA. We maintain that a proper policy solution lies in an examination that includes all radio sectors.

Yours Faithfully

Christine Rhodes
Station Manager
Mt Isa Christian Broadcasters Assn