15th February 2008

The General Manager
ACMA
PO Box Q500
Queen Victoria Building
Sydney NSW 1230

Dear Sir

Re Draft Variation to Licence Area Plan for Lithgow, NSW

Northside Broadcasting Co-operative Ltd (2NSB) opposes the issuing of the 99.5 MHz frequency to 2ICE in the above draft plan.

Our technical predications indicate that, should 99.5 MHz be issued to 2ICE, the transmission is likely to interfere with reception of 2NSB’s program (broadcast on 99.3 MHz) within our defined service area.

2NSB already has major reception problems within our service area which ACMA is aware of. While many of these problems result from intermodulation issues our advice is that an adjacent channel service, such as that proposed on 99.5 MHz, will cause further degradation of reception to listeners who are already experiencing reception difficulties. In addition, parts of our service area receive field strengths of less than our protected field strength of 66 dB uV/m. It is submitted that a new radio service transmitting on such a close frequency to 99.3 MHz will further degrade our reception within our specified service area.

In the event that the frequency is issued to 2ICE we request that interference management of the transmission be strictly enforced.

It should be noted that 2NSB is not opposed to the granting of a suitable frequency to 2ICE but requests that such a frequency not have the potential to interfere with existing services. It should also be noted that the transmission is likely to interfere with the reception of 2SSR broadcasting on 99.7 MHz.
Yours sincerely

Northside Broadcasting Co-operative Limited

D A Campbell

David Campbell
Director