Radio Murray Bridge Pty Limited

ABN 087 295 605
9 First Street
Murray Bridge SA 5253
Ph: (08) 8532 4455
Fx: (08) 0532 3703

Submission to the Australian Communications and Media Authority

REFERENCE 2002/0713

Radio Murray Bridge Pty Limited is the licensee of the commercial services SEZY and SMU in Murray Bridge.

On 5th September 2005, ACMA released for comment a Draft LAP Variation for Remote Central & Eastern Australia.

The draft sought numerous changes to the Technical Specifications for the Remote Area Central Zone Licence Area for the Remote Commercial Broadcaster, 8SAT.

Radio Murray Bridge acknowledges and supports the submission made by Commercial Radio Australia with the exception to the technical specifications for the service at Coonalpyn where Radio Murray Bridge believes further protection should be given to it by a reduction in the Maximum ERP to 300 W in the Western & Northern bearing sectors as detailed below.

Radio Murray Bridge is very concerned about the wide scale changes to transmitter locations and power being proposed in this Draft LAP and question the general intent of 8SAT as operator of these services and addresses that in its General Assessment of the Draft Variation.

This submission also highlights the concerns of Radio Murray Bridge specifically in relation to the following proposed variations.

97.7 MHz from Coorong Council Tower Biana Lookout Coonalpyn Read Meninje, with a maximum ERP of 3kW directional, vertical polarization.

The broadcast site is approximately 15km’s to the East of the Murray Bridge Licence Area at a natural height of approximately 168 metres above sea level with no significant natural impediments between it and Murray Bridge Licence Area.

This site has the potential to create significant signal overspill into the Murray Bridge Service, particularly into the townships of Meninje & Tailem Bend. In car listening suggests a broadcast quality signal in both of these townships and as well as the main Highway leading into Murray Bridge.

Radio Murray Bridge seeks an amendment to the draft variation to introduce protection from the potential for signal overspill from 8SAT by imposing a maximum ERP of 3kW from 20 degrees to 250 degrees and 300 W from 250 degrees through 20 degrees.
Radio Murray Bridges agrees with ACMA that the antennae height be limited to the current 20 meters as any increase in antennae height would only require a further reduction in maximum ERP to offset the increased gain from any such change.

95.3 MHz from Perponda Hill 2.2 km W of Fiveways Rd, Perponda (Lameroo), with a maximum ERP of 2kW directional, vertical polarization / 96.5MHz from Thomas Tank Hill Pinaroo, with a maximum ERP of 4kW directional, mixed polarization.

In the October 1996 LAP, the ABA made FM channel capacity available for 8SAT service at Lameroo to operate on 95.3MHz from the R/T Site with a maximum ERP of 100W using an omni directional radiation pattern with mixed polarization.

Freshstream (8SAT) requested that the Lameroo service be relocated to Perponda Hill to serve the Karoonda Area.

The ABA found that this change would provide a less than rural grade service to Lameroo.

In June 2004, 8SAT requested that the service at Pinaroo (96.5MHz) be increased in power to a maximum ERP of 3kW directional to provide service to Lameroo.

The Draft Variation suggests that this request is acceptable in the interests of ensuring a service of rural grade service to Lameroo.

However, Radio Murray Bridge draws ACMA's attention to Freshstream Marketing Material (Attachment 1) which indicates that the Area of Karoonda is currently being served by the Transmitter at Coonalpyn (97.7MHz).

So, by 8SAT's reckoning they are already servicing the Karoonda area with the service from Coonalpyn.

Therefore, we submit that the Draft variation in combination with the claims of 8SAT meet the requirements of providing a service to the townships of Pinaroo & Lameroo (96.5MHz) and Karoonda (97.7MHz)

Radio Murray Bridge therefore contends that the Perponda Hill Service is surplus to the needs of 8SAT.

It may be however, that the marketing material is determined to be misleading, and that a service is required to serve the area of Karoonda.

If so, Radio Murray Bridge believes that if adopted, the proposed specifications would lead to signal overspill into Murray Bridge, Mannum & Tallem Bend which are all part of the Murray Bridge Licence Area.

Request that the Maximum ERP in the sector 200 degrees to 350 degrees be reduced to 200 W.

100.3 MHz from Collins Hill Bordertown Road Padthaway, with a maximum ERP of 5kW directional, vertical polarization.

Radio Murray Bridge notes the changes to the Technical Specifications for this service and is satisfied with the draft variation if it continues to include the special condition on the service requiring the ERP to be reduced in the event of interference is caused to the service operated by Radio Murray Bridge on 100.3MHz in Mt Barker.
95.5 MHz from CFS Site Old Bullock Truck, Kingscote with a maximum ERP of 3kW directional, vertical polarization.

There is the potential for signal overspill at Victor Harbor, Middleton, Port Elliot & Goolwa within the Murray Bridge Licence area with adoption of the proposed specifications.

Request that the Maximum ERP in the sector 0 degrees through 135 degrees be reduced to 250 W.

General Assessment of Draft Variation.

It is the view of Radio Murray Bridge that the remote area broadcaster 8SAT, operator of the service known as Freshstream is seeking to build a service that will provide coverage to areas already licenced to cover and adequately covered by commercial operators. Namely in this case, Radio Murray Bridge.

We submit that the requests for changes in transmitter locations and power indicate a pattern of seeking fortuitous coverage into areas that are already well served by commercial broadcasters.

It seems extraordinary that a change in location from Keith (with a population of 1189) to Coonalpyn (with a population of 273) could only be considered as desirable when one has taken into consideration the potential upside to gains through a tortuous penetration into a neighbouring commercial service area (Murray Bridge Service Area Pop. 85,000)

Another example of this could be seen in the request to move the transmitter location for the service at Lameroo (pop. 516) and approximately 75km's from the Radio Murray Bridge Licence area to Perponda which is approximately 10km's from the Radio Murray Bridge Licence Area and with the closest remote township being Karoonda (Pop. 327)

We again draw attention to the marketing material (attachment 1) and submit that this is further evidence of Freshstream’s intent to provide a service to communities outside its licence area.

In fact, the we first became aware of Freshstream’s existence after a number of advertisers on Radio Murray Bridge were approached by Freshstream with an offer of advertising that would cover their needs in Murray Bridge.

Finally, while we acknowledge that ACMA uses the technical limitation of 54 dB/u to measure signal overspill into neighbouring markets, we submit that in relatively flat areas such as those being considered in the Draft submission, a signal strength of 40 dB/u is enough to adequately receive a service.

Radio Murray Bridge requests that ACMA consider these views when addressing any requested changes to technical specifications and that any changes that could conceivably have an upside to 8SAT through the effects of signal overspill and fortuitous coverage into neighbouring licence areas be opposed.

Summary

5MU and 5EZY will likely be affected by increase in power of 8SAT FM transmitters located at Coonalpyn, Perponda, Kingscote and Padthaway and request the following variations.

Coonalpyn (97.7 MHz)

Maximum ERP in the sector 350 degrees through 20 degrees be reduced to 300 W.

Perponda (95.3 MHz)

Maximum ERP in the sector 200 degrees through 350 degrees be reduced to 200 W.

Kingscote (95.5 MHz)
Maximum ERP in the sector 0 degrees through 135 degrees be reduced to 250 W.

Padthaway (100.3MHz)

SEZY may be affected by changes to the technical specifications for the service at Bordertown (Padthaway) and request the confirmation of the special condition imposed on the 8SAT as it relates to potential interference to SEZY.

Should you wish to discuss any of the issues raised in this submission, please contact Dugald Cameron at Radio Murray Bridge on 02 9929 2111

Radio Murray Bridge
30th September 2005