Rebel media

Draft Variation to the LAP – Remote Central and Eastern Australia
Radio – No 1 of 2011
RPS/TPED/DTD
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Draft LAP Variation - 4BRZ/4RBL

Rebel is licensee of commercial radio broadcasting services 4BRZ and 4RBL.

Preliminary View 4 – 4RBL – Aurukun, Bamaga, Gununa, Hope Vale, Kowanyama, Poropuraaw, Theodore
Preliminary View 5 – 4RBL & 4BRZ – Barrington/Stratford
Preliminary View 6 – 4RBL & 4BRZ – Chinchilla
Preliminary View 7 – 4RBL & 4BRZ – Goondiwindi
Preliminary View 8 – 4RBL & 4BRZ – Alpha, Banana, Collinsville, Dirranbandi, Julia Creek, Karumba, Miles, Monto, Normanton, Taroom, Tenterfield, Theodore, Wandoan, Wilcannia

Rebel support ACMA Preliminary Views 4, 5, 6, 7 and 8 in the ACMA Explanatory Paper of September 2011.

Preliminary View 9 – 4RBL & 4BRZ – Clermont and Yungaburra

Rebel does not support the removal of Collection Districts (CD) 3031502 and 3030701 from the Rebel (4BRZ/4RBL) licence area.

The ACMA noted these two areas are exclaves that can not be served from the main body of the Rebel Licence area. It is however the nature of the Rebel licence area that it contains many exclaves that are not contiguously joined with the greater body of the licence area. We are concerned about the prospect of the ACMA removing any exclaves from our licence area, including Clermont and Yungaburra.

The ACMA noted that the Rebel Clermont CD is within the Emerald RA1 licence area and that the Yungaburra CD is within the Atherton RA1 licence area. The Rebel licence area currently overlaps dozens of other commercial radio markets, and the Rebel licence area already overlaps additional other CD’s within both the Emerald RA1 and Atherton RA1 licence area.

The ACMA has made the assumption that removing the CD’s from the Rebel licence area will not adversely effect the communities. Halving the number of commercial radio services licenced to these communities will significantly reduce the future diversity and ranges of services available to that community, which must surely have an adversarial effect.

Both these communities have been within the Rebel licence area since at least 1991, and possibly earlier than that. 20+ years is a long time to be in our licence area, and no matter how it occurred, it is reasonable to consider it a permanent feature after such a long period of time.
Of particular concern to us is that Rebel has been trying for many years to secure FM spectrum to serve these communities. Rebel has invested its resources, in good faith, to find the best sites and specifications to serve these communities. In early 2009, we reached preliminary agreement with ACMA engineering on suitable sites, power levels and radiation patterns. The following FM channels were found to be suitable by both Rebel and ACMA Engineering:

- Clermont; 4BRZ 100.3 MHz, 4RBL 97.9 MHz
- Yungaburra; 4BRZ 103.1 MHz, 4RBL 92.7 MHz

In planning these sites and determining infrastructure requirements (as Yungaburra is a Greenfield site), Rebel has spent time talking to locals in both communities, and there is a reasonable expectation by both Rebel and locals that those services in time, would be delivered, and were being looked forward to.

They have been in our licence area for 20+ years and are ready to go, with no further engineering work required by the ACMA or Rebel. We are in agreement on specifications and we suggest the ACMA licence them accordingly.

In 2009 the ACMA proposed that the nearby Queensland CD 3050501 be returned to our licence area, that had been accidentally removed, and we request that be done.

Regards

Aaron Jowitt
Director