The Manager
Radio Planning Section
Technical Planning and Evaluation Branch
Australian Communications and Media Authority
P.O. Box 78
BELCONNEN ACT 2616

Dear Sir,

RE: Draft Variation to Licence Area Plan for Hobart Radio;
ACMA File reference ACMA2009/820

I respond to the ACMA’s invitation for submissions in relation to the proposed variation of the Hobart Radio Licence Area Plan, reference ACMA 2009/820, on behalf of Southern Cross Media Australia Pty Ltd, the parent entity of Esperance Broadcasters Pty Ltd, licensee of Radio 6SE Esperance.

Radio 6SE provides coverage on 747 kHz to the population of the Esperance RA1 Licence Area, including the towns of Hopetoun, Ravensthorpe and Norseman, all between 140 and 180 km distant from the 6SE transmitter site, 10 km north of Esperance. Received signal levels in these regional centres are only a few millivolts per metre at best. As with all AM services, this signal level struggles to be heard over an ever-increasing noise floor on the MF broadcast band.

Therefore, it is of high importance to this company that the circulated proposal to vary the technical specification of the ABC AM service 7PB at Ralfes Bay Hobart should not result in the further deterioration of the reception of 6SE in its own licence area.

Southern Cross Media has engaged the services of Alex Kennedy of Radio Transmission Pty Ltd of Guildford Sydney to review and report on the predicted impact the increase to 5kW by day and night from Ralfes Bay on 747 kHz would have on the night-time useable signal level in the above-mentioned towns in the Esperance licence area.

Alex’s preliminary assessment has resulted in the view that the ABC’s 5kW 747 kHz omni proposal will adversely affect the reception of the 6SE service in various areas of the Esperance Licence Area. He has raised significant concern about the propensity of the towers at the Broadcast Australia site Ralfes Bay to radiate significantly more than 705V CMF toward the Esperance licence area, given that there are a number of MF towers at the site, and that these have the capacity to have interactive effects on the otherwise-
omnidirectional characteristic sought for the 747 kHz service. This is particularly relevant if Broadcast Australia proposes to combine the 747 kHz service at 5kW into the main 198m tower.

Proper, definitive modelling and analysis of the radiation characteristics of the proposed service is not possible without more technical information being requested and provided by either the ACMA or Broadcast Australia. Specifically, we seek the following information:

1. Confirmation of which tower at Ralfes Bay is intended to transmit the 747 kHz service;

2. Provision of a site plan with the positions of all towers identified;

3. Details of existing and proposed circuit plans, and circuit details of the sectionalising network used on the 198m tower, together with the diameter of its capacitive hat;

4. Advice on whether any of the towers used on the three and four tower standby antennas, are earthed or base-insulated; and if base-insulated, we seek to be advised if the guys are insulated.

It is apparent that Alex will need to approach ACMA and BA technical staff to request this information, and while we anticipate that both would be happy to co-operate with the supply of the required data, it is obvious that this will require time to accomplish and thereafter to analyse and report on.

Therefore, Southern Cross Media requires an extension of time to lodge a final, informed submission on this matter and respectfully requests that the ACMA grant a one month extension deadline for submissions to the 21st April 2011.

Yours sincerely,

[Signature]

James Vasey
Group Engineering Manager – Radio
Southern Cross Media Australia Pty Ltd.

Friday 25th March 2011