Draft variation to Sydney Radio LAP – No.1 of 2013
Radio Planning Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

SUBMISSION ON ACMA 2012/673 – PENRITH HPON

Thank you for the opportunity of making a submission on the proposed frequency change to the Penrith HPON operating as Cool Country 2KA.

I would first like to endorse the summary provided in the ACMA paper. The harmful interference experienced at night time has significantly damaged our ability to service our listener base. The licence conditions limit night time coverage to 15% of the defined area and just 9% of the population. Day time coverage is not much better because of the power limitation to prevent harmful interference to 4ZR in Roma.

There are no conditions or limitations noted on the licence to hint that there were any such problems with harmful interference or an inability to service the defined coverage area during the day time. Given that ACMA was aware that the original 1476 kHz AM licence operated from Emu Plains by 2KA (before transitioning to ONE FM on 96.1 MHz) experienced harmful interference from 4ZR, and that HPONs are afforded the same level of protection from harmful interference as commercial, community and public licences, this limitation should have been included on the licence. The Act makes provision for limitations, such as this, to be included on broadcast licences.

Subsequent to the purchase of the Penrith HPON, Futrends Pty Ltd stumbled across the history of the harmful interference. The contractor engaged to conduct field strength tests throughout the defined coverage area had also been contracted by the original 2KA to design a 2kW DA to be located at Londonderry to overcome the harmful interference experienced at night time by 4ZR. This proposal had been discussed with ACMA during the design development process. The issue was resolved when the 96.1 MHz FM licence was made available to 2KA and their AM licences were handed back to ACMA.

A key issue is that it doesn’t matter where in west Sydney 1476 kHz is transmitted, it will experience harmful interference at night time. Drive anywhere around Sydney at night-time and you can often hear 4ZR quite clearly away from the immediate area around the Penrith HPON transmitter. I have made the point a number of times that, given the inevitability for harmful interference, 1476 kHz should never have been offered as the Penrith HPON and, similarly, should never again be offered anywhere around Sydney. The night time sky wave field strength from 4ZR is very strong throughout the Sydney area.
The change in frequency from 1476 kHz to 1386 kHz will resolve the harmful interference problem and the increase in power will enable the effective servicing of the coverage area defined on the licence, ie 20 km radius from the south end of Glenmore Park. This change is necessary for narrowcast services to be effectively broadcast across West Sydney, as per the defined coverage area in accordance with the provisions of the Act.

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