15th January 2008

Re: Draft variation to licence area plan for Lithgow, NSW (File Reference 2005/2174)

Dear Sir/Madam,

I write in regard to the proposed licence area plan variations for Lithgow. I note that the ACMA plans to restrict coverage of the 2ICE and 2LT translator services at Wentworth Falls to the lower Blue Mountains with a maximum of 40 watts ERP. In general, people would envisage the Nepean River as the boundary between the Blue Mountains and Sydney. This is further reflected by the fact that the lower Blue Mountains area is within the local government area of the Blue Mountains City Council which is based in Katoomba. As such, Katoomba has as strong of a link to the lower Blue Mountains as it would to Lithgow (if not a stronger one) and thus should not be restricted to only 40 watts from these services.

By restricting coverage to the east of Wentworth Falls is to decline the lower Blue Mountains of a true local commercial radio service. There is no local ABC service for the Blue Mountains and commercial service 2ONE caters for Western Sydney as opposed to the Blue Mountains. It would appear that MCAL is committed to offering a local service to the Blue Mountains, their submission shows that they are intending to relay local crisis information in times of emergency and a 40 watt restriction, particularly with the rugged terrain of the area, means that people in the lower Blue Mountains may not be able to receive these services sufficiently which would be especially important in life threatening circumstances.

2ONE which is licensed to Katoomba but does not serve the local area operates at 5kW in all directions from the same site; it seems very unjust that a service planned to serve the same area and also one with a local commitment will be restricted to 40 watts for much of the Blue Mountains, only \( \frac{1}{125} \)th of the ERP of 2ONE. Even the community service 2BLU which made a submission during the previous Lithgow LAP comment period about insufficient power transmits at 200W in all directions, still five times the ERP of the proposed 2ICE and 2LT services to the east. As the ACMA file reference shows, this debacle has stretched on literally for a matter of several years, in the meantime leaving the Blue Mountains without a local commercial radio service. Having taken this long to come this far, the proposed service which will only properly serve the upper Blue Mountains simply is not good enough. It does not make sense for the new services to only service half of the Blue Mountains. A local service catering for the entire Blue Mountains is a necessity especially considering the high bushfire risk in the area; the people of Blue Mountains deserve a service which will cater for the entire Blue Mountains area.

In an attempt to avoid overspill into Sydney, it seems the ACMA is vastly overcompensating to a degree to which even the intended service area will not be sufficiently served. ARN, the big multinational owners of 2ONE are given 5,000 watts to serve the lower Blue Mountains whereas the struggling local operator MCAL who are actually trying to serve the local community are unjustly and severely disadvantaged given only 40 watts, a vastly underpowered service. At 40 watts, services from Sydney or even the Central Coast or Wollongong are likely to be better received in the lower Blue Mountains. I therefore urge the ACMA to consider giving the Blue Mountains a true local commercial radio service by allowing 2ICE and 2LT to transmit at a higher power towards the lower Blue Mountains, at the very least, 200 watts – typically allocated to localised sub-metro radio stations in the Sydney metropolitan area.

Yours faithfully,

W. Yang.