Explanatory Paper

Revised Draft Variation to Licence Area Plan for Wagga
Wagga Radio
Call for Submissions

Submissions on the matters raised in this Explanatory Paper may be made to the ABA as follows:

By email: lapvariation@acma.gov.au

By mail: Draft LAP Variation – Wagga Wagga
Australian Broadcasting Authority
PO Box 34
BELCONNEN ACT 2616

By fax: (02) 6253 3277

Please quote file reference 2002/0782 in your reply.

Any enquiries concerning matters raised in this document should be directed to Lachlan Habgood on (02) 6256 2872.

The closing date for submissions is 5.00pm, Friday 25 February 2006.

All submissions received will be made available for public inspection on the ACMA website.¹ (www.acma.gov.au) and go to Home > Latest > For Comment > Broadcasting > Draft licence area plans (LAPs)

¹ Note that any submission marked “In Confidence”, “Confidential” or similar, cannot be considered by ACMA in finalising the LAP variation.
Preliminary View

Preliminary View – Community Radio – Wagga Wagga

ACMA proposes to make available additional FM channel capacity for FM translator services for the existing Wagga Wagga community FM service 2AAA as follows:

From a site at Willans Hill South, Wagga Wagga on 107.9 MHz with a maximum ERP of 20 W (omnidirectional using a mixed polarisation);

From a site at the Water Tower Wardle St, Junee on 97.9 MHz with a maximum ERP of 20 W (omnidirectional using a mixed polarisation);

From a site at Mt Parnassus Lookout, Gundagai on 99.1 MHz, with a maximum ERP of 20 W (omnidirectional using a mixed polarisation);

From a site at the Water Tower, Coolamon on 99.1 MHz with a maximum ERP of 20 W (omnidirectional using a mixed polarisation);

ACMA proposes to remove the technical specifications it previously made available to 2AAA to relocate its transmitter to a site at Wheel of Fortune in Wagga Wagga. ACMA proposes to rename the 2AAA (SL3039) community licence area to Wagga Wagga RA3 and to extend this licence area to the townships of Gundagai and Coolamon.

Preliminary View – Community Radio – Tumut

ACMA proposes to make available additional FM channel capacity for FM translator services for the existing Tumut community FM service 2TVR Tumut as follows:

From a site at Big Talbingo Mountain, Talbingo on 94.3 MHz with a maximum ERP of 10 W (omnidirectional using a mixed polarisation);

From a site at Mount Parnassus Lookout, Gundagai on 94.3 MHz with a maximum ERP of 20 W (omnidirectional using a mixed polarisation).

ACMA proposes to extend the Tumut RA1 licence area to include the townships of Gundagai and Talbingo.

On 9 June 2005 the then Australian Broadcasting Authority (ABA) released a draft licence area plan (LAP) and explanatory paper seeking comment on its proposal to make additional channel capacity for Wagga Wagga community FM service 2AAA. It was proposed that the translators would be made available to improve reception in Wagga Wagga (south) and Junee and to extend the 2AAA licence area to include the townships of Gundagai and Coolamon.

In response to the draft LAP variation two submissions were received, from community radio broadcaster 2TVR Tumut (2TVR) and commercial radio broadcaster 2WG. 2WG opposed the proposed licence area extension, stating that it and commercial radio service 2WZD provided a comprehensive service to those townships that included community announcements.

2TVR supported the proposal to extend the 2AAA licence area but also requested that it be allowed to extend its own licence area to cover the township of Gundagai and Talbingo.

On 1 July 2005, the Australian Communications Authority and the Australian Broadcasting Authority merged to form the Australian Communications and Media Authority.
Authority (ACMA). ACMA, as the new broadcasting regulator, has taken on responsibility for all the former ABA’s business. As was the case with the ABA, ACMA is bound to consider any request from a broadcaster in a licence area who wishes to change the conditions of its broadcasting service. Both 2AAA and 2TVR reside in the Wagga Wagga LAP and ACMA has therefore decided to release a revised draft LAP variation and explanatory paper for Wagga Wagga seeking submissions on the proposals for 2AAA and 2TVR community radio services. ACMA will use the submissions it receives to decide as to the best make up of services in the Wagga Wagga licence area.

The Wagga Wagga licence area plan (LAP) was last varied on 24 February 2005 and at that time technical specifications were made available to allow 2AAA to relocate its transmitter to a site at Wheel of Fortune, Wagga Wagga. 2AAA had previously indicated its service suffered from inadequate reception in the southern part of Wagga Wagga, Junee, Uranquinty and The Rock. However, shortly after making these technical specifications available, 2AAA indicated that would not be in a position to ever move its transmission facilities to that site and instead proposed that channel capacity be made available for the four new translators discussed in this paper below. ACMA therefore proposes to remove the technical specifications the ABA made available to allow 2AAA to broadcast from the Wheel of Fortune site from the LAP.

2AAA Wagga Wagga (south)

2AAA has requested additional channel capacity in order to resolve coverage deficiencies in the southern part of Wagga Wagga city, including the new suburbs of Tolland, Tatton, Bourke Lands, Springvale and parts of Red Hill Road in Kooringal. ACMA has conducted broadcast engineering assessments and is of the view that the FM reception is inadequate in that part of the 2AAA licence area. ACMA proposes to make FM channel 107.9 MHz available for a transmitter located at Willans Hill South, Wagga Wagga, to operate at a maximum ERP of 20 W with an omnidirectional radiation pattern using a mixed polarisation.

ACMA is of the view that the proposed FM service will rectify the existing FM coverage deficiencies in the southern part of Wagga Wagga City. The proposed FM service is planned to provide a suburban grade of service.

2AAA Junee

2AAA has requested additional channel capacity in order to resolve coverage deficiencies in the Junee area of its existing licence area. ACMA has conducted broadcast engineering assessments and is of the view that the FM reception is inadequate in that part of the 2AAA licence area.

ACMA proposes to make FM channel 97.9 MHz available for a transmitter located at Water Tower Site, Wardle Street, Junee to operate at a maximum ERP of 20 W with an omnidirectional radiation pattern using a mixed polarisation. ACMA is of the view that the proposed FM service will rectify the existing FM coverage deficiencies in Junee. The proposed FM service is planned to provide a suburban grade of service.
Extension of licence areas

When examining licence extension requests from broadcasters, ACMA looks to the relevant policy guidelines relating to extension of licence areas for community radio services specified in Chapter 4 (2) of the publication *The ABA’s General Approach to Analog Planning*. This publication can be found on ACMA’s website at [http://www.acma.gov.au/acmainterwr/aba/licplan/planning/documents/general.pdf](http://www.acma.gov.au/acmainterwr/aba/licplan/planning/documents/general.pdf)

The relevant policy guidelines state *inter alia* that:

In determining a new community service licence area, or granting an extension to an existing community radio broadcasting service licence area, ACMA will have regard to:

- Whether a community radio broadcasting service exists in the proposed licence area, and whether it serves a ‘special interest’ or geographic (‘broad-based’) community-of-interest.
- Whether a community-of-interest exists, over what geographic area, and whether that community-of-interest is currently being served.

In cases where an existing community radio broadcaster seeks to extend its licence area, and endeavours to foster an independent locally-based aspirant group have proven to be unsuccessful, whether members of the community that the aspirant or licensed community radio broadcaster aims to serve will be able to actively participate in the operation and programming of the licensee in providing the service. Where the geographic distance may seem to prohibit active participation, and the aspirant or licensed community radio broadcaster can demonstrate that initiatives to foster the establishment of locally-based community radio broadcasting service have proven to be unsuccessful, applicants will be required to outline the strategies they would adopt to overcome such problems.

2AAA proposal – Extension to Gundagai and Coolamon

Gundagai has a population of 1,997 people and Coolamon has a population of approximately 1,350 people against 2001 census boundaries. Neither of the towns have ever had a community radio service or an aspirant community radio broadcaster.

In its proposal dated 23 February 2005, 2AAA requested that the then ABA extend its licence area to include the townships of Gundagai and Coolamon and for the towns to be served by FM translators with 2AAA program content. In making its request, the salient points that 2AAA has addressed in relation to the relevant policy guidelines are:

A community-of-interest exists as both Gundagai and Coolamon are relatively close to Wagga Wagga. Wagga Wagga provides services for Gundagai and Coolamon such as specialist medical services, employment, major education facilities and most media. A number of residents travel to Wagga Wagga each day for business, sporting activities and for those services not provided in the towns. Residents of both Gundagai and Coolamon are invited to actively participate in the service by either becoming a member or part owner or through radio presentation training allowing individuals to provide on-air programming.

2AAA is able to provide a number of programs not currently available from other media, including jazz, blues, multicultural, Indigenous, extensive country music and music from the 40’s, 50’s and 60’s.

2AAA stated that live community radio provides access for community announcements that otherwise may not exist, for example venue changes outside
normal hours, urgent council information, warnings, fire calls, school bus trips late arrival and police messages.

2AAA provided a letter from Ms Kay Hull MP, Federal Member for Riverina, supporting the extension the 2AAA community radio service to Gundagai.

**2TVR Gundagai and Talbingo proposal**

Talbingo has a population of 297 people against 2001 census boundaries. Neither Talbingo nor Gundagai have ever had a community radio service or an aspirant community radio broadcaster.

2TVR has requested that it be allowed to extend its service to cover the townships of Gundagai and Talbingo and areas to the Northern side of the Kosiscko National park. In making its request, 2TVR has addressed the relevant policy guidelines as follows:

2TVR stated Tumut shares close community ties with both Gundagai and Talbingo.

2TVR provided a list of activities that are shared between the towns of Tumut and Talbingo including sporting ties, roadways tourism ventures, medical services, banking, real estate, emergencies and some schooling ties . Employment is another major community ties between the towns with the Snowy Hydro being the main employer. Talbingo was built for the Snowy Mountains Scheme and then later handed to the Tumut Shire to be part of its local government region. 2TVR also noted that Talbingo is only 30 minutes from Tumut by car.

2TVR stated that Tumut is a close neighbour to Gundagai, sharing similar community of interest, resources, families, sports and facilities.

2TVR is a generalist community broadcaster, providing a mix of music and community information programs, including rural news, funeral announcement and regular interviews with the Rural Fire service, police and local schools. 2TVR provides a mix of music, including 60’s, 70’s , easy gold and ARIA top 10.

2TVR states that it will establish studios in both Gundagai and Talbingo to allow direct community input to the service.

**Initial consultation - Gundagai**

Prior to the receipt of the 2TVR submission requesting an extension of its service to Gundagai and Talbingo, ACMA conducted a telephone inquiry with the Acting General Manager of the Gundagai Shire Council, Mr Paul Luff to obtain his views on the community of interest links between the inhabitants of Gundagai and the city of Wagga Wagga. Mr Luff stated that Wagga Wagga is approximately 80 kms from Gundagai and shares its western boundary with the City of Wagga Wagga. In respect of education, transport, shopping patterns, health services, banking, entertainment and sporting activities, Mr Luff considered that the residents of Gundagai were closely linked to Wagga Wagga.

With respect of the use of media in Gundagai, Mr Luff stated that ABC regional radio service 2RVR is broadcast to Gundagai along with Wagga Wagga commercial radio services 2WG and 2WZD. The Wagga Wagga newspaper, The Daily Advertiser, is widely read in the Gundagai district.
Following receipt of the 2TVR request, ACMA again contacted Gundagai Council and spoke to Mr Graeme Tickner, General Manager, Gundagai Council on 18 August 2005 to discuss both the 2AAA and 2TVR proposals.

Overall, Mr Tickner stated that Gundagai would welcome both 2AAA and 2TVR broadcasts into Gundagai, but on reflection, considered that Gundagai had closer community of interest ties with Tumut than Wagga Wagga. His reasons for this view are as follows.

**Social and Economic links between the centres**
Mr Tickner noted the closer distance between Tumut and Gundagai (38 kms) compared to Wagga Wagga and Gundagai (80 kms) as one of the major contributing factors in forming the view that Gundagai had closer ties to Tumut than Wagga Wagga. Many Gundagai residents work at the Visy paper pulp mill in Tumut and the mill is important enough that the Gundagai and Tumut councils are seeking to re-establish freight rail services between the towns. Residents of Gundagai also regularly go to Tumut for sporting, social and entertainment reasons because of the close proximity. Mr Luff did note that as there is no movie theatre in Gundagai, many Gundagai residents went to Wagga Wagga.

**Government Functions and responsibilities**
Mr Tickner stated the Gundagai and Tumut councils share ownership of buildings. The two councils are principal partners in cooperation for tourism strategies. The two councils also have a partnership on road expenditure and also share a boundary (to the south of Gundagai Shire).

**Existing Media markets**
Mr Tickner stated that Gundagai receives ABC regional radio service 2RVR and the commercial radio services 2WG and 2WZD from Wagga Wagga. The Tumut and Adelong Times and The Wagga Wagga daily Advertiser newspapers are widely read in Gundagai.

**Whether people identify with a notion of community for the purposes of access to services?**
Mr Tickner considered that generally, Gundagai residents will go to Wagga Wagga for specialist services, eg medical, but for sport, shopping and other entertainment will go to Tumut.

**Support for the 2AAA Coolamon extension**
2AAA provided a letter from the Coolamon Shire Council which supported its proposal to extend its coverage to Coolamon. The Council stated it would provide space on the Coolamon mobile phone tower for transmission equipment and waive the normal lease payment of $5000.00 per annum and electricity costs to assist the project. 2AAA also submitted a petition of 180 signatures from Coolamon residents and a letter of support from Ms Kay Hull MP supporting the extension of the 2AAA service to Coolamon.

**Support for the 2TVR Talbingo extension**
2TVR provided letters of support for the extension of the service to Talbingo and its surrounding area, from National Parks and Wildlife Service, the Talbingo Rural Fire Brigade, Snowy Hydro Ltd and the Talbingo Fishing Club.
Discussion

Both Gundagai and Coolamon are closer in proximity to Wagga Wagga than to any other large regional centre such as Canberra or Albury, and it is therefore likely that community of interest ties exist between the towns because of this. ACMA also acknowledges 2TVR’s claims concerning the community of interest ties between Tumut and the towns of Gundagai and Talbingo.

Both services provide generalist community broadcasting. 2AAA states it currently operates 24 hours a day, seven days a week with 18 hours a day of live to air broadcasts. 2AAA further states that currently all radio is broadcast from Wagga Wagga on a part time basis only or is networked from capital cities and that its programming will originate from the studios in Wagga Wagga. 2AAA has indicated that that completion of any site will be subject to available finance, the Coolamon Council appears supportive of 2AAA providing a local translator service and have indicated that it is prepared to provide significant financial support.

ACMA agrees with the community of interest ties put submitted by 2AAA in relation to Gundagai and Coolamon and therefore proposes to make FM channel 99.1 MHz available for a transmitter located at Mt Parnassus Lookout, Gundagai to operate at a maximum ERP of 20 W with an omnidirectional radiation pattern using a mixed polarisation. ACMA is of the view that the proposed FM service will provide a suburban grade of service to the township of Gundagai.

ACMA also proposes to make FM channel 99.1 MHz available for a transmitter located at the Water Tower, Coolamon to operate at a maximum ERP of 20 W with an omnidirectional radiation pattern using a mixed polarisation. ACMA is of the view that the proposed FM service will provide a suburban grade of service to the township of Coolamon.

2TVR has indicated that it will seek to establish live studios in Talbingo and Gundagai if its request to extend the licence area is successful. 2TVR states that this will provide a better quality of local information, encourage local members to participate without needing to travel to the main studio in Tumut and allow better training in the communities.

ACMA agrees with the community of interest ties submitted by 2TVR in relation to Gundagai and Talbingo and ACMA therefore proposes to make FM channel 94.3 MHz available for a transmitter located at Mt Parnassus Lookout, Gundagai to operate at a maximum ERP of 20 W with an omnidirectional radiation pattern using a mixed polarisation. ACMA is of the view that the proposed FM service will provide a suburban grade of service to the township of Gundagai.

ACMA proposes to make FM channel 94.1 MHz available for a transmitter located at Big Talbingo Mountain, Talbingo to operate at a maximum ERP of 10 W with an omnidirectional radiation pattern using a mixed polarisation. ACMA is of the view that the proposed FM service will provide a suburban grade of service to the township of Talbingo.

ACMA invites comment on the proposals to provide translators for, and extend the licence area of 2AAA to Gundagai and Coolamon and extend the licence areas of 2TVR to Gundagai and Talbingo. While it is not common that two community services would seek to extend their respective licence areas to cover the same area at the same time, as in
the case of Gundagai, ACMA is not adverse to this taking place in principle. However, ACMA looks to the public for its view and will consider such views closely prior to making its final decision on the extension of either services licence area.

**ACMA Engineering Assessment**

The proposed FM translators for the 2AAA service will provide a maximum effective radiated power (ERP) of 20 W each and are not expected to cause interference to other services. All four translators have been planned as ‘town only’ services and have been planned to provide a suburban grade of service.

The proposed FM translators for the 2TVR licence extension to Gundagai and Talbingo will provide a maximum ERP of 20 W and 10 W respectively and are not expected to cause interference to other services. The 2TVR translators, as in the case of the 2AAA translators, have been planned as ‘town only’ services.

Although 2TVR requested an extension of its licence area to cover the town of Talbingo and its surrounding area, ACMA considers this is not an efficient use of available radiofrequency spectrum. When proposing a licence area extension, ACMA is bound to plan using boundaries established by the Australian Bureau of Statistics’ collection districts (CD’s). The area comprising the CD that surrounds the town of Talbingo is larger than the existing 2TVR licence area. It also suffers from significant terrain shielding and would require a significant increase in ERP to adequately cover the entire CD. This in turn would cause significant signal overspill into neighbouring licence areas and would have the potential to cause interference to other existing broadcasting services.

The transmission site for the 2TVR Talbingo service is 4 km to the south east of the Talbingo township at Commsite, Big Talbingo Mountain and is outside the planned licence area extension.
Preliminary View – Variation to Frequency Allotment Plan – Murrumbidgee/Riverina, NSW

ACMA proposes to vary the frequency allotment plan (FAP) for the VHF FM radio bands for R10 Murrumbidgee/Riverina as it relates to the preliminary view on the community radio service in the region.

In forming this view, ACMA considered and reached views about the likely effects of its proposal, having regard to the local circumstances within the market, the likely impact of other planning proposals in this draft LAP and other relevant matters under s.23(a)-(g). An account of this process of consideration follows.

The FAP and LAP for an area together constitute ACMA’s ‘blueprint’ for the development of broadcasting in that area using the broadcasting services bands. The frequency allotment plan sets out the number of channels and the licence area plan describes the characteristics of the services using, or that are proposed to use, those channels. The two documents must be consistent: s.26(1).

In preparing its initial, Australia-wide frequency allotment plan of August 1994, the then ABA foreshadowed that the plan would be revised as necessary, market by market, to accommodate any additional or changed broadcasting requirements disclosed during public consultation at the licence area planning stage:

‘(The FAP’s) assumptions about demand, nominal transmitter specifications and siting will be re-examined during preparation of the LAPs for particular areas of Australia, at which time it will be subject to intensive public consultation. This may necessitate variations to this FAP... Consultation on the changes will take place within the LAP consultation process.’

‘The FAP will also be revised to reflect any additional services planned during the LAP stage (particularly low power channels). If the revised FAP results in changes in channel capacity for areas outside the area for which the licence area plan is being prepared, the changes will be subjected to public consultation in affected areas.’

(Frequency Allotment Plan; August 1994; Pg. 9, ‘Planning Process Overview’)

ACMA proposes to add capacity to the FAP for four town only channels for the existing community radio service 2AAA in Wagga Wagga City south, Junee, Gundagai and Coolamon, as shown in the proposed FAP variation instrument. ACMA also proposes to add capacity to the FAP for two town only services for the existing community radio service 2TVR in Gundagai and Talbingo, as shown in the proposed FAP variation instrument.