COMMUNITY BROADCASTING ASSOCIATION OF AUSTRALIA

FM broadcasting services band in the Perth RA1 licence area

Comments on the ACMA options paper

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1. Introduction

1.1 The Community Broadcasting Association of Australia (CBAA) welcomes the opportunity to respond to the ACMA options paper, 'FM broadcasting services band in the Perth RA1 licence area'.

1.2 Key comments are highlighted below, with further background and comment following.

Key comments on Perth radio planning – FM and AM

1.3 As it is part of the mix of primary radio services in Perth, the situation of community metropolitan-wide MF-AM radio reading service, 6RPH, needs to be considered.

1.4 A number of the options proposed impact upon community radio broadcasters, requiring either a change of frequency or a change of transmission site location: specifically, 6KCR, 6SEN and 6WSM.

1.5 Before the proposed options — or alternative changes which may affect other community broadcasters — could be considered further, there will need to be agreement from the affected community licensees, and recognising that such disruption and costs to community broadcasters would be to enable an improved outcome for other broadcasters, national or commercial.

1.6 The CBAA has commenced initial discussions with community broadcasters affected by the proposed options. The CBAA intends to continue to support and facilitate further discussions with a view to explore and agree on a positive way forward for all stakeholders.

1.7 Further considerations include recognising the implications of potential proposed changes; any relevant commercial negotiations; and existing or future transmission facility arrangements, equipment life, or other relevant contractual obligations and terms.

1.8 Until these matters are discussed further with the relevant licensees and broadcasters, including planning consideration of the 6RPH service, the CBAA would not support the proposals as they stand being put forward as a formal variation of the Perth RA1 licence area plan.

1.9 The CBAA will also seek the tidy up and amendment to several long-standing historical anomalies related to specific licensees be included as part of the formal variation of the Perth RA1 licence area plan, including in relation to 6NME, 6EBA, and 6NR.

Key comments on Perth radio planning – Digital Radio and Digital Television

1.10 The CBAA considers the proposed replan of Perth radio services to be significant, and that — in assessing options for AM and FM — it would be best practice for the ACMA to consider the full set of options for provision of free-to-air broadcast radio services in Perth, which takes in delivery by digital radio and also delivery by digital television.

1.11 Listener take-up of DAB+ digital radio is significant at around 30%[1] of all radio listening. Home/fixed location DAB+ receivers are already at commodity pricing. Therefore, the shift from MF-AM to analogue VHF-FM has a limited timeline of utility, the end-point of which is now largely driven by receiver ubiquity in vehicles. Given that over 77%[2] of new vehicles now come equipped with DAB+ digital radio, it is reasonable to anticipate a ten-year window of utility for VHF-FM. The ACMA options paper obviously assumes the sunset of MF-AM in Perth to be sooner.

1.12 There are constraints on the number of community digital radio services able to be delivered, within the limited amount of digital capacity reserved or available. This is especially acute in Perth, where there is only one Foundation multiplex available.

1.13 To address this, the CBAA has already noted in 2021-22 comments on the ACMA Five-Year Spectrum Outlook 2021-26, that it wishes the ACMA to re-assess spectrum options across Perth/Mandurah to add a digital radio multiplex and/or improve spectrum efficiency and service outcomes as from Q3 2021, leading to a revised DRCP and consultation in Q1 2022.

1.14 The national broadcasters (ABC and SBS) already provide radio services via free-to-air digital television, including to Perth. The community sector wishes to do likewise, and has written on this matter as part of submissions[3] to the Government's Media Reform Green Paper that is considering next-generation television licensing and multiplexing.

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1 CRA, GfK, Digital Radio listening, all stations, 30.9%, 10.56 hrs per week. CBAA NLS, 30.5%, July 2019

2 Glass's Automotive Business Intelligence, CRA, March 2021

3 Government Media Reform Green Paper, CBAA submission, May 2021

2. Background to CBAA and community broadcasting

2.1 The Community Broadcasting Association of Australia is the peak body for community broadcasting licensees in Australia.

2.2 At the time of writing, nationally, 354 (and a further 94 temporary) not-for-profit community radio licensees provide services with significant public benefit, including a diverse mix of social and cultural interests, specialist talks and music, and high levels of local content and presentation.

2.3 Community interests addressed include Indigenous services, radio reading services for the print disability community, youth, seniors, LGBTQIA+, religious and faith-based services, ethnic language and multicultural radio, specialist music, educational and general geographic services.

2.4 Community radio stations operate as independent not-for-profit organisations that actively encourage participation by members of their communities, with well over 20,000 volunteers involved nationally.

2.5 Community analogue radio stations operate overwhelmingly in the VHF band and in the majority of towns and cities across Australia, with approximately 75% located in regional and remote areas, and 25% across metropolitan locations.

2.6 Community digital radio services operate under long-term licensing arrangements in Sydney, Melbourne, Brisbane, Adelaide and Perth, with services now also operating in Canberra, Hobart and Darwin. Digital radio services for the Gold Coast area are under implementation, with further regional areas and development now a priority to be addressed.

2.7 Community television services operate in Melbourne and Adelaide, with access to broadcast band spectrum for delivery of free-to-air digital television services being subject to renewal under repeated consecutive short-term arrangements.

2.8 Guiding principles underpin community broadcasting Codes of Practice and the contribution of community services to media diversity and social inclusion.

2.9 Community broadcasting licences are issued pursuant to and in promotion of the objects of the Broadcasting Services Act 1992 (BSA).

3. ACMA consultation and Perth radio options paper

3.1 In the past, use of the VHF-FM broadcasting services band had been constrained in the Perth area due to the use of VHF Band II channels for analogue television in Bunbury.

3.2 These channels have not been used for television since the switchover to digital television in 2013.

3.3 The ACMA has identified an opportunity to replan radio services in the Perth RA1 licence area, and in its options paper describes its initial engineering assessment.

3.4 That initial assessment has identified up to five additional high-power/wide-coverage frequencies in the VHF-FM band that could be used:

- to convert existing radio services in Perth from MF-AM to VHF-FM; and/or
- to allocate new commercial, national, community or narrowcasting services.

3.5 The ACMA assessment identifies a set of consequential changes and impacts to existing radio services in order that these new frequencies may be used.

3.6 The ACMA paper notes:

- options that require changes (of varying degrees) to transmission towers or frequencies, are likely to incur some costs for affected broadcasters; and
- it is important that there be licensee agreement about the proposed changes.

3.7 The ACMA has identified a set of options for use of the five additional frequencies, which, in summary, propose:

- conversion to VHF-FM of three national ABC MF-AM services (6PB, 6WF, 6RN); and
- conversion to VHF-FM of two commercial MF-AM services (6PR and 6IX).

https://www.cbaa.org.au/sites/default/files/media/CBAA-Media-Reform-20210523.pdf

4. Comments

4.1 The CBAA comments that follow are made within the wider context of radio planning for Perth, not limited to only VHF-FM planning, but taking into account the situation of MF-AM services, the availability of analogue VHF-FM, and the access to digital radio and digital television delivery for simulcast or multi-channel services.

4.2 The CBAA comments are limited to addressing at an initial and high level, the specific implications for community broadcasters that have been identified as being affected by the potential changes in the ACMA options paper and its initial engineering assessment.

Options to be considered for existing AM broadcaster, 6RPH, Perth

4.3 A key point not yet canvassed by the ACMA or in the options paper is the situation of the existing community Perth metropolitan-wide MF-AM radio reading service, 6RPH.

4.4 The situation of 6RPH being on MF-AM needs to be considered. This service cannot be left stranded on MF-AM, should the five other metropolitan MF-AM broadcasters vacate.

4.5 The licensee of 6RPH, Vision Australia, has a history of wanting to move from MF-AM in Perth: partly due to operational costs reasons; and partly for much the same reasons as outlined in the ACMA options paper in respect of the national and commercial AM broadcasters, which describes poor AM reception in Perth due to poor soil conductivity, the geography of the area and impulse noise from electric rail and powerlines.

4.6 The existing MF-AM 6RPH service relies heavily on the parallel operation of its service on DAB+ digital radio to address these issues.

4.7 However, overall digital radio multiplex capacity available and reserved for community radio broadcasting is highly constrained in Perth, as there is only one Foundation digital radio multiplex.

4.8 While better than AM reception and quality, this constraint results in the DAB+ reception quality and service options being constrained for 6RPH. Along with other community broadcasters, 6RPH is unable to provide a benchmark quality primary service with full reception protection, and prevented from providing multi-channels, as do other broadcasters, and as is the case in other cities.

4.9 The community sector overall seeks better service outcomes, and the CBAA has requested the ACMA re-assess spectrum options across Perth/Mandurah to add a digital radio multiplex and/or improve spectrum efficiency and service outcomes as from Q3 2021, leading to a revised DRCP and consultation in Q1 2022. The CBAA will correspond further on this matter separately.

4.10 The national broadcasters (ABC and SBS) already provide radio services via free-to-air digital television, including to Perth. The community sector, and, in particular, 6RPH, wish to do likewise, and have written on this matter as part of the CBAA submission to the Government's Media Reform Green Paper that is considering next-generation television licensing and multiplexing,

4.11 Meanwhile, and, alongside, just as for the existing national and commercial MF-AM broadcasters, the CBAA seeks that 6RPH be included in this re-planning to use VHF-FM.

4.12 This leads to the need for a re-think of the initial engineering assessment as set out in the ACMA options paper for Perth.

4.13 One way forward would be to assess whether a further VHF channel can be found, increasing the number of potential new VHF-FM channels available from five to six.

4.14 The new channel to be found could be planned as a nominal 16 kW ERP service or similar, in alignment with the pattern of other typical metropolitan-wide community radio service specifications.

4.15 The CBAA, in association with the Vision Australia 6RPH service, wish to explore the possible options in detail with the ACMA, with a view to a satisfactory outcome, and as a precursor and prerequisite to any next step consideration of a formal variation of the Perth RA1 licence area plan.

High-power Perth services for ABC - 102.5 MHz, 103.3 MHz, 104.1 MHz

4.16 The ACMA options paper identifies three channels for use at 100 kW ERP, with the intent that they be used for ABC services. For efficiency, the channels are planned as being co-located and adjacent in an 800 kHz raster.

4.17 The use of the channel operating at 102.5 MHz presupposes changes in the operating frequency or the transmitter site location of several services.

Potential consequential changes to 6KCR, Kalamunda

4.18 The sub-metropolitan community broadcaster at Kalamunda, 6KCR, is operating on that same 102.5 MHz frequency, and, for purpose, does not transmit from (one of) the main Perth VHF transmit site/s.

4.19 To make way for the high-power ABC service, 6KCR is being asked to consider changing to operate on a different frequency. At this stage, that is suggested as being 88.9 MHz and from the existing 6KCR transmitter site.

4.20 The CBAA understands that 6KCR would face a level of disruption and cost in making this change. The dimension of that is to be assessed, after which the station may then be able to fully determine its position and views in regard to the suggested or other possible changes, and from a solid information base.

4.21 6KCR is licensed to operate a limited, sub-metropolitan footprint, and with relatively low power compared to the main-site metropolitan services. The current licensed power is 200 watts ERP, vertically polarised, and with an antenna height of 20 metres.

4.22 While a change is suggested, the ACMA options paper does not include a draft technical specification for the potential revised transmission arrangements for 6KCR.

4.23 The ACMA options paper text indicates a frequency change from 102.5 MHz to 88.9 MHz and operation from the same location, but there is no indication as to whether changes to power or polarisation may be contemplated.

4.24 A change to the 6KCR frequency will entail some equipment and antenna and mast changes, as well as a level of station presenter, community profile and listener disruption.

4.25 6KCR does not currently have access to free-to-air DAB+ digital radio. The station considers digital radio should be an option available to its listeners.

Potential consequential changes to 6SEN, Perth

4.26 The metropolitan-wide community broadcaster 6SEN is operating on a frequency of 101.7 MHz, and from a transmit site at Wireless Hill, Ardross: not at one of the main Perth VHF transmit site/s.

4.27 To accommodate introduction of the high-power ABC service, 6SEN is being asked to consider re-locating its transmission facilities to one of the main Perth VHF site/s.

4.28 The CBAA understands that 6SEN would face a significant level of disruption and cost in making this change. The dimension of that is to be assessed, after which the station may then be able to fully determine its position and views in regard to the suggested or other possible changes, and from a solid information base.

4.29 6SEN is licensed to operate with a metropolitan-wide footprint. It operates from a transmit site at Ardross with a licensed power of 8 kW ERP, vertically polarised, and with an antenna height of 50 metres.

4.30 While a change is suggested, the ACMA options paper does not include a draft technical specification for the potential revised transmission arrangements for 6SEN.

4.31 The ACMA options paper text indicates continued use of 101.7 MHz but suggests a shift to one of the main Perth VHF transmit sites as being necessary. There is an indication that its licensed power be increased to 16 kW ERP, with no mention as to whether a change in polarisation may be contemplated.

4.32 The CBAA presumes a suggested new technical specification for 6SEN might be in alignment with the pattern of other typical metropolitan-wide community radio service specifications operating at the main Perth VHF transmit site/s, although it is unclear whether there may be constraints or other special conditions applied.

4.33 The CBAA understands 6SEN highly prefers to retain transmission facilities at Ardross.

4.34 Any change will entail some equipment and antenna and mast changes, as well as a level of station presenter, community profile and listener disruption.

4.35 The station is concerned that its investment in current equipment and transmit site facilities would be negatively affected, and that operation from a new location would involve significant one-off costs, and may add very significant increases to annual on-going costs that may challenge the station's sustainability.

4.36 The CBAA has begun discussions with a view to explore and agree on a positive way forward for all stakeholders, recognising the implications of potential changes; and to consider relevant commercial negotiations; and existing or future transmission facility arrangements, equipment life, or other relevant contractual obligations and terms.

4.37 The CBAA intends to continue to support and facilitate further discussions.

4.38 6SEN does have access to free-to-air DAB+ digital radio. The station considers digital radio a key part of its remit to provide coverage of the 6SEN community broadcasting service across all of the Perth RA1 area.

4.39 6SEN reports strong take-up by it listeners of DAB+ digital radio, and looks forward to further improvement in digital radio coverage and capacity.

High-power Perth services for commercial broadcasters - 91.3 MHz, 104.9 MHz

4.40 The ACMA options paper identifies two channels for use at 40 kW ERP, with the intent that they be used for conversion from MF-AM to high-power VHF-FM of two existing commercial radio services, 6PR and 6IX.

4.41 The use of the channel operating at 91.3 MHz presupposes changes in the operating frequency of community radio service, 6SWM.

Potential consequential changes to 6WSM, Fremantle

4.42 The sub-metropolitan community broadcaster 6WSM is one of two community services licensed to serve Fremantle. 6WSM is on the frequency of 91.3 MHz, and both services operate from a transmitter site in East Fremantle.

4.43 To make way for a commercial service, 6WSM is being asked to consider changing to operate on a different frequency. At this stage, that is suggested as being 107.0 MHz and from the existing 6WSM transmitter site.

4.44 The CBAA understands that 6WSM would face a level of disruption and cost in making this change. The dimension of that is to be assessed, after which the station may then be able to fully determine its position and views in regard to the suggested or other possible changes, and from a solid information base.

4.45 6WSM is licensed to operate a limited, sub-metropolitan footprint, and with relatively low power compared to the main-site metropolitan services. The current licensed power is 200 watts ERP, vertically polarised, and with an antenna height of 20 metres.

4.46 The ACMA options paper does include a draft technical specification for the potential revised transmission arrangements for 6WSM.

4.47 This indicates a frequency change from 91.3 MHz to 107.0 MHz and operation from the same location, and suggests an increase in licensed power to 600 watts, retaining vertical polarisation and the same antenna height of 20 metres.

4.48 No special notes or conditions are indicated, although the options paper text indicates the increase in licensed power is intended to mitigate potential interference from a nearby sub-metropolitan community broadcaster in Armadale, 6HFM, as 6WSM would then be operating then with only 300 kHz separation from 6HFM.

4.49 This close separation may have impacts in both directions, and the CBAA would be keen to see that analysed by the ACMA as part of overall next stage considerations.

4.50 A change to the 6WSM frequency will entail some equipment and antenna and mast changes, as well as a level of station presenter, community profile and listener disruption.

4.51 6WSM does not currently have access to free-to-air DAB+ digital radio.

5. General comments and recap

5.1 The CBAA recognises the significance of suggested changes proposed and outlined in the ACMA options paper, 'FM broadcasting services band in the Perth RA1 licence area'.

5.2 If effected, the changes would introduce multiple high-power VHF-FM services to Perth, with the potential for permanent closure of multiple Perth based MF-AM services.

5.3 The CBAA and the community radio broadcasting sector welcome changes that result in improvements to free-to-air radio service for listeners.

5.4 Given the significance of the proposed replan of Perth radio services, the CBAA suggests the ACMA continue to take account of the situation of all community broadcasters, as well as the national and commercial broadcasters.

5.5 The CBAA also suggests the ACMA keep a wide view of free-to-air broadcast radio service delivery in Perth, in that it involves consideration of delivery by digital radio and digital television, as well as by MF-AM and VHF-FM.

5.6 In regard to the specific issues raised with VHF-FM re-planning, the CBAA has commenced initial discussions with a view to explore and agree on a positive way forward for all stakeholders, recognising the implications of potential changes; and to consider relevant commercial negotiations; and existing or future transmission facility arrangements, equipment life, or other relevant contractual obligations and terms.

5.7 The CBAA intends to continue to support and facilitate further discussions.

5.8 Until these matters are discussed further with the relevant licensees and broadcasters, including planning consideration for 6RPH service, the CBAA would not support the proposals as they stand being put forward as a formal variation of the Perth RA1 licence area plan.

6. Other matters

6.1 The CBAA notes that there are a number of historical matters to tidy through amendment to several long-standing anomalies related to specific licensees that can be included as part of the formal variation of the Perth RA1 licence area plan.

6NME, Perth, Indigenous

6.2 There is an outdated special condition applied the technical specification of 6NME, operating on 100.9 MHz, regarding it being subject to clearance of Bunbury analogue television. As that clearance occurred in 2013, this special condition may be removed.

6EBA, Perth, Ethnic

6.3 There is an amendment to be made to the antenna height of 6EBA, operating on 95.3 MHz, so that the technical specification describes the correct and typical licence specification, which is 16 kW ERP, mixed polarisation and with an antenna height of 116 metres. Currently, the antenna height is noted incorrectly and specified at 30 metres.

6NR, Perth, Educational

6.4 There is an opportunity to amend the maximum ERP of 6NR, operating on 100.1 MHz, so that the technical specification provides for that station to operate at the typical licence specification, which is 16 kW ERP, mixed polarisation and with an antenna height of 116 metres. Currently, the maximum ERP for 6NR is out of step, and limited to 6.5 kW ERP.

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