



COMMUNITY
BROADCASTING
ASSOCIATION OF
AUSTRALIA

March 2019

**Proposed digital radio channel plan and
foundation digital radio multiplex transmitter licence declaration
for Mandurah, WA**

**Submission by the Community Broadcasting Association of Australia
to the Australian Communications and Media Authority**

1. Introduction

- 1.1 The Community Broadcasting Association of Australia (CBAA) welcomes the opportunity to submit comments in relation to the ACMA's proposal to vary the Radiocommunications (Digital Radio Channels - Western Australia) Plan 2007 to insert a new DRCP in a new schedule to allot and reserve frequency blocks, determine licence types and determine the technical specifications for digital radio services in the Mandurah RA1 licence area.
- 1.2 The ACMA proposes to:
 - Include a Category 1 and Category 3 DRMT licence for Mandurah RA1.
 - Allot the frequency block 8C for the Mandurah RA1 foundation category 1 DRMT licence, with a centre frequency (MHz) 199.360 and technical specification number TS12000551.
 - Reserve the frequency block 9C for the Mandurah RA1 category 3 DRMT licence, with a centre frequency (MHz) 206.352 and technical specification number 12000552.
- 1.3 The ACMA proposes an ERP of 10kW for the technical specifications of the foundation Category 1 and Category 3 DRMT licences for Mandurah RA1.
- 1.4 In addition, the ACMA proposes to make a declaration that the Category 1 DRMT licence be a foundation DRMT licence for the purposes of the Radiocommunications Act.

2. Background

- 2.1 The CBAA is the peak body for community broadcasting in Australia, representing over 350+ licensed community broadcasters.
- 2.2 There are currently 36 community broadcasting licensees eligible to be access seekers and providing 40+ on-air digital radio services in Brisbane, Sydney, Melbourne, Adelaide and Perth, alongside commercial and national digital radio services.
- 2.3 A further 12+ eligible community broadcasting licensees are to commence operating digital radio services in Darwin, Canberra and Hobart in 2019. Mandurah is one of a wider set of locations under planning consideration for extension of digital radio.
- 2.4 The provision of community broadcasting services on digital radio is an important aspect of, and contribution to, locally produced content and free-to-air media diversity.

3. Digital radio planning principles, as applied to Mandurah

- 3.1 The ACMA consultation paper references the ACMA's planning principles for the expansion of digital radio to regional Australia, noting that the principles are based on those developed by the Digital Radio Planning Committee for Regional Australia.
- 3.2 The Digital Radio Planning Committee, is chaired by the ACMA with membership including the national, commercial and community broadcasters, represented by the CBAA, and extending also to the ACCC.
- 3.3 In line with the planning principles, the ACMA has developed a set of indicative regional allotment plans addressing regional (and metropolitan) licence areas.
- 3.4 The consultation paper notes that the indicative regional allotment plans were developed in 2018 for all regional areas and released to network engineers.
- 3.5 As a general point, given the utility of this information, the CBAA suggests the ACMA consider publishing these indicative regional allotment plans on the ACMA website in order to promote positive, open and wider engagement on the development and rollout of digital radio.
- 3.6 The planning principles specify a maximum ERP of 5kW be used in the allotment planning process for the majority of licence areas.
- 3.7 The proposed DRCP for Mandurah provides for a higher ERP of 10kW from the outset.
- 3.8 As noted in the consultation paper, the completion of region-wide allotment plans allows for the prediction of interference (and overspill) potential with a degree of certainty.
- 3.9 At the higher 10 kW ERP the ACMA estimates the level of overspill into the neighbouring licence areas of Perth and Bunbury will approximate that of the current commercial FM services, adding that the use of 10 kW ERP is not expected to have a significant effect on any other licence area's frequency allotment.
- 3.10 The CBAA has no reason to doubt these assessments, noting that the output radiation pattern for the Category 1 DRMT licence is specifically limited in all directions other than 145–335 °T.
- 3.11 The CBAA also notes that, other than a different channel allocation, the same technical specification, including ERP and output radiation pattern, applies to both the Category 1 (commercial/community) allocation and the Category 3 (National) reservation.
- 3.12 While management of potential interference is obviously necessary, the CBAA reiterates its long-standing view that limiting overspill into adjacent commercial licence areas is not a matter of key concern. In fact, rather than planning being dictated by coverage ending neatly to commercial licence area boundaries, the CBAA considers it more relevant that digital radio services are able to be well-received in ways that are relevant to listeners, and that channels be allocated and operated to achieve best spectrum efficiency.
- 3.13 The CBAA notes that the high level planning principles upon which specific Digital Radio Channel Plans are based rely upon following existing commercial licence area boundaries and generally assume that licence areas would not be aggregated.
- 3.14 The CBAA has long supported the desirability of licence area aggregation in the planning of digital radio. It has previously supported recommendations to the Digital Radio Planning Committee that licence area aggregation be used as a tool to maximise efficiency and minimise the extent of interference between digital radio services.
- 3.15 The CBAA has also noted that, in some cases, limited aggregation or an approach not based on pre-existing (analogue) licence area boundaries would make for more efficient use of spectrum and a better mix of digital radio service outcomes to the public.
- 3.16 The CBAA acknowledges that the current planning and the proposed Mandurah channel plan is cast in the context of no licence area aggregation.

- 3.17 It seems likely that the reservation of frequency block 9C with a specification targeting Mandurah commercial radio RA1 licence area may not be the best fit for delivery of national services.
- 3.18 The most likely listener expectation is that the mix of national digital radio services currently receivable in Perth also be receivable in Mandurah and in a near-to-continuous manner across both Perth and Mandurah. That expectation might be most efficiently met by a Single Frequency Network (SFN) extension of the Perth services.
- 3.19 Were digital radio services to be provisioned across Mandurah using a dedicated and separate frequency block from that used in Perth - as is proposed in this DRCP - then perhaps service following/linking could be considered. That may at least improve the listener experience for digital radio services that do have genuine reason to be heard in a near-to-continuous manner across both Perth and Mandurah.
- 3.20 There is likely to be a genuine listener expectation that a number of community digital radio services currently operating in Perth also be receivable in a near-to-continuous manner across both Perth and Mandurah. In the absence of commercial licence area aggregation, licensing to extend and/or provide for out-of-area extension for those community services should be considered.

4. Foundation multiplex and capacity

- 4.1 The consultation paper notes that the ACMA proposes to make a declaration that the proposed Category 1 DRMT licence for Mandurah RA1 be issued as a foundation DRMT licence for the purposes of the Radiocommunications Act.
- 4.2 The consultation paper notes that the Act restricts digital commercial radio licensees from accessing any more than two-ninths of gross multiplex capacity.
- 4.3 There are two commercial broadcasting licensees in Mandurah RA1, both operated by the one owner.
- 4.4 Each commercial radio licensee has a standard entitlement to one-ninth of gross multiplex capacity, and the right to bid for up to an additional one-ninth of any excess capacity.
- 4.5 Therefore in Mandurah, the two commercial radio licensees may access up to a maximum total of four-ninths of multiplex capacity.
- 4.6 There is a reservation of two-ninths of multiplex capacity for community radio licensees with, at the time of writing, no existing analogue community radio licensed specifically to Mandurah.
- 4.7 The remaining multiplex capacity is unused, underlining that, without some limited licence area aggregation applied in digital radio planning, there are less than optimal service outcomes for listeners.

5. Further consideration

- 5.1 The CBAА is pleased to be an active participant in the Digital Radio Planning Committee, chaired by the ACMA.
- 5.2 The CBAА recommends that the Digital Radio Planning Committee meet to consider options for best spectrum efficiency and listener outcomes as part of ACMA's consultation process in relation to Mandurah.
- 5.3 Bearing in mind points outlined above, the Digital Radio Planning Committee may be a useful part of ACMA's consultation process in relation to Mandurah, and to explore options for flexibility that may secure improved listener outcomes and more efficient use of channel allocations, affecting community, commercial and national broadcasters.

//