



ENGINEERING

ACE Radio Broadcasters response to proposed variation of Remote Central & Eastern Australia - 2016 (No. 1)

Introduction

ACE Radio Broadcasters operate 13 commercial radio services in Victoria and Southern NSW.

The proposed "Beulah" transmitter that is part of the Draft Variation to the Remote Central and Eastern Australia LAP, causes some concern for our licences in the Horsham RA1 LAP, 3WM & 3WWM. The proposed Beulah transmitter is located in an area of the RCEA LAP that is part of the Horsham RA1 LAP and will also transmit into the Swan Hill RA1 LAP. The township of Beulah is located in both the Horsham RA1 and Swan Hill RA1 LAP's as well as the RCEA LAP.

Submission

ACE Radio Broadcasters oppose the location of the (8SAT) "Beulah" transmission site. ACE Radio are convinced the proposed transmission will reach the higher population centre of Warracknabeal, located outside of the RCEA LAP.

The Greenfield site proposed is too close to Warracknabeal. The so called Beulah site is physically a similar distance to Warracknabeal (21km) as it is to Beulah (19km). We believe this will result in a fortuitous signal to Warracknabeal and other towns outside of the RCEA LAP (Jeparit & Rainbow). 8SAT already have a fortuitous signal into Hopetoun that the AMCA advised was "unavoidable". The proposed Beulah site will provide fortuitous signal into Warracknabeal and other areas well outside the RCEA LAP, even at the requested 3kW. 8SAT also have a history of using omnidirectional antenna systems even when the specifications state directional antenna patterns.

Additionally, ACE Radio opposes the increase in power suggested by ACMA for the proposed Beulah transmitter. 3kW is adequate power to get signal to Beulah (and Warracknabeal). The proposed 6kW only increases the overspill of signal beyond the RCEA LAP.

ACE Radio suggests choosing a transmission site closer to Beulah. This would reduce the overspill outside of the RCEA LAP and achieve better coverage of the populated areas within the RCEA LAP, even with a lower power level.

ACMA previously rejected ACE Radio's application for a medium power translator for Hopetoun on the grounds of overspill and inefficient use of the

spectrum. The proposed Beulah (Brim West) 8SAT transmission appears to breach both these requirements.

Summary

ACE Radio Broadcasters believe a lower power, omnidirectional transmission based closer to Beulah would reduce overspill, serve the township of Beulah more effectively and make more efficient use of the spectrum. As the proposed site is a greenfield site, it shouldn't be difficult to find a more suitable site closer to Beulah.

ACE Radio Broadcasters also fully support the submission from Commercial Radio Australia with regards to this matter.

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