



Draft Variation to RCEA LAP
Broadcasting Carriage Policy Section
Australian Communications and Media Authority
PO Box 78, Belconnen ACT 2616
LAPRequests@acma.gov.au

Thursday 24 March 2016

Reference ACMA2010/1753

Rebel Media [RM] provides commercial FM radio services 4BRZ [Breeze] and 4RBL [Rebel]. I refer to the ACMA Discussion Paper, Preliminary View 2;

Bocoble

I accept the ACMA's proposed specifications will provide a practical avenue to commence RM services and welcome their finalisation in this LAP.

Compared to the 2013 draft LAP specifications, the ACMA 2016 draft LAP specifications will reduce population overspill within the 2GEE market by 20%. Unfortunately the discussion paper does not consider or discuss the corresponding significant reduction in adequate coverage that will occur within the RM market. Hundreds of people stand to miss out on receiving RM services if this downgrade is finalised.

With 2GEE and RM transmitters both co-sited at Mt Bocoble, the ACMA is proposing RM services operate at lower power than 2GEE across most sectors, with the 2016 draft LAP specifications featuring even lower power than the 2013 draft LAP specifications. This makes no sense given RM has the larger licence area. The RM licence area boundaries (in most directions) are more distant from Mt Bocoble than the 2GEE licence area boundary from Mt Bocoble.

The result of the ACMA proposal is that 2GEE from Mt Bocoble will adequately;

- reach more territory and more people within the 2GEE/RM overlap licence area than RM. The differential will be greater with the 2016 draft LAP specifications compared to the 2013 draft LAP specifications.
- reach more territory and more people within the solus RM licence area than RM. The differential will be greater with the 2016 draft LAP specifications compared to the 2013 draft LAP specifications.

RM is the incumbent Mt Bocoble licensee and it is unfair 2GEE (whose Mt Bocoble specification RM objected to) would be purposely planned by the ACMA to reach further and better into the RM licence area. While I welcome the 2016 draft LAP specifications as a means to enter the market, I urge the ACMA to finalise the 2013 draft LAP specifications to allow RM to adequately reach more people, and be able to compete more equitably with the 2GEE Mt Bocoble reach, both within the overlap licence area and within the solus RM licence area.

Coolah

I accept the ACMA's proposed specifications and welcome their finalisation in this LAP.

I request a change to the 4BRZ and 4RBL Coolah advisory note to protect reception within Dunedoo township to a signal level of 54 db uV/m. ACMA RPS previously advised it would be willing to consider that change. I understand that the ACMA considers that given 2TRR serves Dunedoo and Coolah with separate transmitters, and that RM could also consider separate transmitters.

2TRR initially commenced service as a 1kw Dunedoo only station and years later expanded to Coolah, but does not serve the greater Warrumbungles region. Modelling shows the RM Coolah services will provide a rural grade stereo signal level to Dunedoo township (which meets the target grade coverage) and the RM Warrumbungles services will provide rural grade coverage further north of the town.

As such, the cost effective and spectrum efficient approach in the lightly populated Dunedoo & Coolah region is for the RM Coolah services to service Dunedoo township.

Warrumbungles

I acknowledge the ACMA's 2016 draft LAP specifications will provide a welcome improvement to RM services compared to the exiting LAP and I support it being based on a practical antenna pattern.

The Warrumbungles nominal site appears as a newly created site called "Nominal Planning Site Mt Cenn Cruaich". We were not aware that a site change was being made from the 2013 draft LAP site of "Broadcast Australia 152m Tower". The sites are ~50 metres apart and have a height differential of ~5 metres. We suggest the highest point of the mountain is the appropriate nominal site location for the final LAP.

Compared to the 2013 draft LAP proposals, the 2016 draft LAP proposes to halve the power of the Warrumbungles services from 5kw to 2.5kw, and lower the broadcast antenna height from 114m to 35m. Unfortunately the discussion paper does not consider or discuss the significant reduction

in the coverage footprint, reducing licence area highway coverage and rural farm reach by some 5,000+ km². The ACMA's population modelling shows an additional 1,000+ people in our licence area will be permanently left without adequate coverage (compared to the original 5kw proposal), with little likelihood of them ever receiving a licensed commercial FM radio service.

As the 2013 draft LAP specifications allow for the best coverage of our licence area, I urge the ACMA to consider finalising the 2013 draft LAP specifications.

Coonamble

The proposed ACMA frequencies for the two in-fill translator sites for the Warrumbungles services are;

4BRZ Coolah 98.7 MHz, Coonamble 100.3 MHz

4RBL Coolah 100.3 MHz, Coonamble 98.7 MHz

This will create confusion in the market, as they are directly reversed between the two towns and services. We suggest a logical swap would be;

4BRZ Coolah & Coonamble 98.7 MHz

4RBL Coolah & Coonamble 100.3 MHz

I ask the ACMA consider swapping the two Coonamble frequencies, if possible in this LAP variation.

Great Lakes

The RM licence area reaches all the Great Lakes, from Wallis Lake in the North to Boolambayte Lake & Bombah Broadwater in the South.

The existing LAP specifications were initially vertically polarised to minimise potential interference to NBN3 analog television. ACMA RPS advised mixed polarisation could be adopted on closure of NBN3. All ABC FM & commercial FM broadcasters in the region, including all those that fortuitously service this part of the RM market, utilise mixed polarisation. Now that NBN3 has closed, I welcome the ACMA bringing licenced polarisation for the RM services into line with the other commercial broadcasters.

I am disappointed the ACMA has not increased the power and coverage area of the services, as modelling demonstrates there are a number of clearly deficient signal areas that will benefit from a power increase. I request the ACMA expedite improving Great Lakes coverage following finalisation of the LAP.

Comboyne

The 1996 LAP specification clearly states the Nominal Location as "3.5km South Of Summit Mount Bulli". This exactly matches the 1996 location of the Vertel Communications site. The 500w LAP directional specification was designed for this location by the ABA, in close consultation with myself.

This reflects that all of the 4RBL (formerly 4SUN) sites planned in the initial 4RBL 1996 LAP were based at preexisting radcom sites.

The AMG reference in the 1996 LAP is an administrative error. It specifies a green field site over 5km distant that is in middle of an isolated farmers crop paddock, and is about the worst possible choice of location for a 500 watt FM site in this area.

TECHNICAL SPECIFICATION - FM Radio			
Specification Number :	TS10003157		
Transmitter Site :-			
Nominal location :	3.5km South of Summit MOUNT BULLI		
Australian Map Grid : Reference	Zone	Easting	Northing
	56	449400	6503800

About the same time, an adjacent commercial broadcasters site was also subject to a similar administrative error where the nominal location was apparently correct and an ABA error was made with the co-ordinates. In that instance the ACMA recently accepted it was an earlier co-ordinate error and administratively amended the licence co-ordinates to reflect the original LAP nominal location.

I ask the ACMA take the same approach, amend the 4RBL LAP site to reflect the preexisting radcom site based at the 1996 LAP nominal location, and proceed with a LAP variation to licence 4BRZ at the corrected location.

At the corrected location, the 4RBL service has a large and crucial rural grade stereo coverage contour, which should remain protected to its current 54 db uV/m LAP level. If this is not possible on the planned frequencies, then change of 4BRZ/4RBL frequencies should be progressed.

Kendall

I welcome the proposed specifications in the final LAP. These are 'in fill' translators for the earlier proposed primary wide coverage Hastings services, and I am disappointed the primary Hastings services did not make this LAP variation. I request the ACMA expedite planning the Hastings services following finalisation of the LAP.

Wide Bay Central (Childers)

I welcome the flexibility the ACMA is providing with the two LAP sites. I have concern with the

advisory notes and the possible unintended consequence of requiring RM to reduce power from 1kw to 0.7kw if relocating to an alternate location that is of the same height or lower height than the existing 1kw site.

A relocation from the existing Mt Goonaneman 1kw site to a nearby site that is of similar height (or lower), will result in a similar (or lower) level of coverage. In those circumstances, it would be inappropriate for RM services to reduce ERP below 1kw if moving more than 20 metres from the current site. We request the ACMA reword the advisory notes in the final LAP accordingly.

I am disappointed the ACMA has not proceeded with a coverage increase in this LAP variation to resolve known deficiencies, particularly in the Gin Gin and Burrum Heads region. I request the ACMA expedite Wide Bay Central coverage improvements following finalisation of the LAP.

Cooktown

I support the proposed specification change in the final LAP.

Regards

A handwritten signature in black ink, appearing to read 'Aaron Jowitt', with a stylized flourish at the end.

Aaron Jowitt
Managing Director
Rebel Media