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**SUBMISSION BY COMMERCIAL RADIO AUSTRALIA
ACMA PROPOSAL TO VARY THE NOWRA LICENCE AREA PLAN
CONSULTATION PAPER DATED JANUARY 2020**

4th March 2020

This letter is in support of Commercial Radio Australia's (CRA) response to the ACMA's consultation paper setting out its proposal to vary the Nowra licence area plan (**Consultation Paper**).

The Consultation Paper outlines two key proposals:

1. Variation of the 2ST commercial service at Nowra; and
2. A new commercial radio broadcasting service in the Nowra RA1 area.

Along with CRA, Nova Entertainment also supports the 2ST variation but also strongly opposes the proposal to allow a new commercial radio broadcasting service in the Nowra RA1 licence area.

The Nowra market, and indeed all radio markets, are well serviced with diverse radio offerings by the commercial radio sector, ABC and SBS, community broadcasters and narrowcast licences.

Given the current economic climate, decreasing advertising revenues, the impact on regional markets from recent natural disasters and the current complex work underway across the sector on the ACCC Report which may lead to significant changes in the regulatory landscape, issuing another licence in the Nowra market would not only impact negatively on that market but would set an undesirable precedent given current market conditions.

Yours sincerely

Cathy O'Connor
Chief Executive Officer

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