



By email: BCP@acma.gov.au

23 October 2020

The Manager
Broadcasting Carriage Policy Section
Spectrum Management Policy Branch
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Proposal to vary Queensland DRCP and declare a Foundation DRMT licence for the Gold Coast IFC 29/2020

About Southern Cross Austereo

The Southern Cross Austereo group (**SCA**) holds two commercial broadcasting licences in the Brisbane RA1 licence area (operating the B105 and Triple M FM radio stations) and in the Gold Coast RA1 licence area (operating the Hit90.9 and Triple M FM radio stations).

SCA also holds 96 Capacity Units of DAB+ spectrum on Brisbane's DAB+ ensemble 1 and 288 Capacity Units of DAB+ spectrum on Brisbane's DAB+ Ensemble 2. SCA currently uses this DAB+ spectrum to provide 11 different DAB+ radio services to Brisbane listeners in addition to our B105 and Triple M FM radio stations. Ten of these DAB+ stations focus on particular music genres within our Hit and Triple M network families. The eleventh is SoundCloud Radio, which plays music from new and emerging artists. SCA's use of this DAB+ spectrum has provided considerable extra choice for radio listeners in the Brisbane licence area.

SCA welcomes the ACMA's consultation regarding proposed variations to the Queensland DRCP.

Gold Coast

SCA supports establishment of a Category 1 and Category 3 DMRT Licence in the Gold Coast RA1 licence area. We consider that technical specifications proposed by the ACMA and set out in Appendix A to the ACMA's consultation paper are appropriate.

In anticipation of the Category 1 DMRT Licence being established, SCA has already held discussions with the other commercial radio licensee in the Gold Coast licence area and would aim to move quickly to establish the required joint venture company and infrastructure to enable the Gold Coast population to enjoy the improved sound quality and greater choice offered by DAB+ radio.

Brisbane

SCA supports the proposed changes to the technical specifications of the three DRMT licences in the Brisbane RA1 licence area.

The current limits on the horizontal radiation pattern and ERP have severely restricted the ability of SCA and other holders of DAB+ spectrum to provide a satisfactory service to the population of the Brisbane RA1 licence area, in particular the population in the northern section of the licence area.

As noted in the ACMA's consultation paper, the reasons for these restrictions were for the protection of adjacent television services. Because those television services have since been "re-stacked" onto different frequencies, there is no longer a justification for these restrictions.

SCA considers the proposed technical specifications outlined in Appendix C of the ACMA's consultation paper are appropriate and should be adopted as soon as practical.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Tony Hudson', with a long horizontal flourish extending to the right.

Tony Hudson
Head of Legal and Corporate Affairs
Southern Cross Austereo Pty Ltd