

23 October 2020

The Manager
Broadcasting Carriage Policy Section
Spectrum Management Policy Branch
Australian Communications and Media Authority
Red Building, Benjamin Offices
Chan St
Belconnen ACT 2617

To The Manager, Broadcasting Carriage Policy Section, ACMA

ACMA proposal to vary the Queensland DRCP and declare a foundation DRMT licence for the Gold Coats – IFC 29/2020

I write on behalf of Australian Radio Network Pty Ltd (**ARN**), a wholly owned subsidiary of HT&E Limited, an Australian ASX listed company. ARN is a major radio network in Australia and operates 12 commercial radio stations across Australia, including the KIIS network in Sydney, Melbourne, Brisbane and Perth; the Pure Gold and WSFM network in Sydney and Melbourne; Mix 102.3 and Cruise 1323 in Adelaide; 4KQ in Brisbane and Mix 106.3 and Hit 104.7 in Canberra (in joint venture with Southern Cross Austereo).

ARN also operates a number of DAB+ radio services in addition to its radio stations operating within the Broadcasting Services Bands, including in the Brisbane RA1 licence area.

Thank you for the opportunity to comment on the ACMA consultation for the proposed variations to the QLD Digital Radio Channel Plan as outlined in the IFC 29/2020 paper dated September 2020 (**Consultation Paper**).

ARN agrees with the proposed changes as outlined in Appendix C of the Consultation Paper, being changes to the technical specification of the three DRMT licences in the Brisbane area to improve coverage. The current restrictions are constraining ARN's ability to provide adequate service to the northern population of the Brisbane RA1 licence area. The reasons for the earlier implementation of these restrictions are no longer relevant following the restack of the television operators into other spectrum frequencies.

Accordingly, ARN supports the ACMA's recommendation. We believe that the proposed technical specifications outlined in the Consultation paper will greatly improve ARN's Brisbane DAB+ services and should be effected as soon as possible.

Yours Sincerely



Irene McMonnies

Legal and Business Affairs Director

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