**October 2020**

# Introduction

The Australian Broadcasting Corporation (“the ABC”) welcomes the opportunity to comment on the Australian Communications and Media Authority (“the ACMA”) proposal to vary the Queensland DRCP and declare a foundation DRMT licence for the Gold Coast.

# Spectrum re-use in neighbouring licence areas

The ABC has been restricted to two frequencies for its Category 3 multiplex DAB+ licences around Australia. This restriction does not apply to the Category 1 multiplex DAB+ licensees, with six frequencies available for re-use across Australia.

The restriction on Category 3 frequency availability will result in the ABC being provided with less favourable treatment than the Category 1 multiplex operators, as the Category 3 multiplex in these regions will either be subject to greater interference, or reduced capacity to deliver localised content to our audiences.

# Brisbane notch removal

The ABC supports the full relaxation of the Brisbane antenna pattern. As submitted in 2017, the ABC is of the view that a fully omnidirectional pattern would provide the Brisbane audience with the best service, and represents less overspill than currently exists in FM.

ABC is actively exploring service following for its digital radio services and improved Brisbane coverage will enable smooth service following to operate between Brisbane and neighbouring markets, including the Gold Coast.

However, the ABC supports the partial relaxation of the spectrum mask as proposed. This partial relaxation represents an improvement on the overall audience experience through improved service following outcomes and will also enable the ABC to increase the operating power of the infill at Mt Mee to better serve Caboolture.

# Gold Coast (Mt Tamborine) technical specification

The ABC supports the increase in proposed effective radiated power for the Gold Coast main DAB+ transmitter from 5kW to 25kW. ABC also supports the proposed spectrum mask.

The ABC submits that the ACMA should include both Mt Tamborine and Lower Beechmont sites as alternative main sites for DAB+ service into the Gold Coast licence area.

The ABC’s analysis would suggest that the proposed spectrum mask and transmitter power could be applied to both sites without alteration. ABC assessment of interference and overspill potential into other markets suggests the Lower Beechmont site would yield lower unwanted signal in neighbouring markets to the north.

Inclusion of both sites as alternatives would be in the overall best interests of the industry in planning for the rollout of new DAB+ services into this region.

The ABC consents to the allocation of channel 8B and requests the other technical specifications at the alternate sites be identical.

The ABC also notes that the Mt Tamborine technical specification does not refer to the Category 3 DAB+ multiplex frequency (8B). This should be included in the final DRCP (and the Lower Beechmont technical specification should include both 8B and 9D).

# Other sites in the Gold Coast licence area

The ABC's coverage assessment of the Gold Coast licence area suggests that additional in-fill transmission sites are likely to be required at Currumbin, Darlington Range (to serve the highway between Pimpama and Beenleigh) and in the CBD. The ABC notes that ACMA proposes to review signal overspill and interference if infill transmitter licence applications are made.

As noted above, the ABC would expect some usable signal overspill between licence areas is justified to permit service following to reliably operate.

# Gold Coast (Mt Springbrook) technical specification

The ABC notes that the ACMA has developed and released a technical specification for Mt Springbrook. The ABC also notes that this site is also likely to be the site from which DAB+ services for the Murwillumbah licence area will be transmitted.

The ABC would expect to be able to serve both the Gold Coast and Murwillumbah licence areas with different local content. ABC currently provides separate ABC Radio services in the Gold Coast and NSW North Coast, and this content offering should be preserved in digital mode.

The ABC has conducted preliminary coverage and interference assessments for spectrum re-use in the Murwillumbah and Lismore licence areas and the impact of such re-use in the ABC Sunshine Coast region (Nambour and Gympie licence areas) and the ABC Southern Queensland region (Kingaroy and Toowoomba licence areas).

It would not be possible for the ABC to operate a Category 3 DAB+ multiplex in all of these licence areas utilising the two channel sets that have been set aside by the ACMA without interference suffered to ABC services. This interference is not present for the Category 1 DAB+ multiplex given there are six frequencies to choose from.

The ABC notes that the current licensees of Murwillumbah and Lismore could share a DAB+ multiplex without any reduction in potential content to these regions. As such, the ABC submits that these licence areas be merged for the purposes of DAB+ transmission, and the frequency that would have been assigned to the Category 1 multiplex be released for use by the Category 3 multiplex licensee.

The ABC also notes that the Mt Springbrook technical specification does not refer to the Category 3 DAB+ multiplex frequency (8B). This should be included in the final DRCP.