

26 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 the Queensland DRCP and declare a foundation DRMT licence for the Gold Coast  
Consultation paper

BAI Communications Australia (BAI) welcomes the opportunity to provide input on the proposed variation to the Queensland DRCP and declaration of a foundation DRMT licence for the Gold Coast.

BAI Communications is a neutral host communications service provider in Australia, USA and Canada, and provider of communications services in Hong Kong. In Australia, BAI provides managed services and portal services to broadcasters as well as site access arrangements to telecommunications and radiocommunications operators. In the USA and Canada, BAI Communications companies provide neutral host communications services including telecommunications, Wi-Fi, and emergency services communications within the New York City and Toronto subway systems. As an operator in both the broadcast and telecommunication markets BAI Communications has a view across a very broad range of spectrum bands managed and regulated by ACMA.

BAI notes that the document proposes the use of block 9D for the Category 1 licence on the Gold Coast both within the document and in the proposed draft technical specifications, however, the proposed use of block 8B for the Category 3 licence is not included in the draft technical specifications.

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The ACMA notes that the National Broadcasters have been provided with two blocks nation-wide and on this basis, propose the use of 8B at the Gold Coast as 9C is currently in-use in Brisbane. The proposed use of the Mt Tamborine site with the proposed specification may limit the National Broadcaster's use of block 8B on the Nambour / Sunshine Coast.

BAI would like to confirm whether the ACMA would favourably view the use of the existing National Broadcaster FM site (Lower Beechmont) using the same radiation pattern proposed as an alternative, at least for the National Broadcasters, as this reduces the potential for interference to the Nambour / Sunshine Coast area whilst still providing excellent coverage to the Gold Coast area.

BAI has no comment on the proposed change to the Brisbane pattern.

Kind regards,



Stephen Farrugia  
Chief Technology Officer  
BAI Communications Australia