



**covering the Gold Coast, Tweed & Northern Rivers**

26<sup>th</sup> October, 2020

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

Consultation 29/2020

Re: Proposed Digital Radio Channels Plan for Brisbane and Gold Coast

Dear Sir

Comments in this submission relate to the proposals to vary the technical specifications for the DRMT licences in Brisbane and (in part) determine that a single category DRMT licence and a single category 3 licence be issued for the Gold Coast area.

Whilst being a supporter of the expansion of DAB+ radio services to regional Australia, particularly given that the metropolitan areas are relatively settled, I remain extremely surprised that services of the nature of the Brisbane DAB+ change and the Gold Coast DAB+ have been proposed.

On the one hand I appreciate why this matter has been progressed and I also appreciate the amount of consultation and discussion that has continued without, to my knowledge, any agreed outcome among neighbouring licensees.

My major comment and objection concerns the impacts on the commercial radio licence area of Murwillumbah – a licence area for which the Broadcast Operations Group holds the commercial licence.

Murwillumbah is a licence area that has, according to the current Section 30 Schedule, a population of 503,992 people.

Importantly there is a 66.12% (219,376 people) population overlap of the Murwillumbah RA1 commercial radio licence area into the Gold Coast RA1 commercial licence area.

At the same time, it must be noted that there is a 27.33% population overlap of the Gold Coast RA1 commercial radio licence area into the Murwillumbah RA1 commercial licence area.

The paper that has been released for consultation is almost ignorant of the fact that Murwillumbah exists and as such the impact of the proposed changes on that licence area.

Whilst I appreciate there is no overlap between the Brisbane commercial licence area and Murwillumbah the impact of the DAB+ services emanating from Brisbane into Murwillumbah has previously been reported and submitted. In essence the “fortuitious” coverage of the existing Brisbane DAB+ services into the Murwillumbah licence area have been previously reported with alarm and impact – the impact ignored is really in relation to the commercial impact. These services draw on advertising revenue.

In relation to the proposal for the Gold Coast DAB+ service my issue relates to one of timing.

The impact of proceeding with the proposed as suggested in ignorance of considering also a DAB+ option for the Murwillumbah licence area is bewildering to be honest.

In essence the impact on a regional licence area with the extent of commercial overlaps in areas such as Murwillumbah will, in my view, be devastating.

Just consider the number of additional services that will be available to the Gold Coast and Murwillumbah “populations” – problem is only those Gold Coast licensees will benefit – namely those that are licenced to the Gold Coast – not Murwillumbah.

This outcome is a gross impropriety.

What is my solution you ask?

For some time now I have asked for the Murwillumbah licence area to be allocated spectrum for DAB+ at the same time as the Gold Coast.

I implore this matter to be addressed by the ACMA immediately.

The commercial impact on the Murwillumbah licence area of additional licences on Murwillumbah is massive, particularly before Murwillumbah has an opportunity to operate on a level playing field.

Murwillumbah has been disadvantaged on a number of fronts to date. It was not eligible to participate in the original round of AM to FM conversion and now the licence has been “slapped in the face” by being placed in an unfair position in terms of competition.

It is not our “fault” that the determined licence area is as it is – this area was determined by the ACMA.

A decision to proceed, and the impact of the Gold Coast proposal, is ignored in the document that is being circulated for consultation.

I cannot understand and I cannot support the proposal as it stands – particularly without a complementary DAB+ option for Murwillumbah.

I stress I submitted previously:

"It is the view of Broadcast Operations that in situations where there is such an overlap as the Gold Coast/Murwillumbah situation planning for the areas should be conducted and released concurrently. To this end steps must be taken to immediately have a DAB+ option planned and able to be implemented for Murwillumbah RA1 to enable a level playing field.

In the absence of that complementary option or opportunity Broadcast Operations have no option but to object to the Gold Coast proposal as expressed in the draft digital channel plan."

Regards,

A handwritten signature in purple ink, appearing to read "Bill Caralis", followed by a horizontal line.

BILL CARALIS  
MANAGING DIRECTOR