



18 June 2021

By email: info@acma.gov.au

Australian Communications and Media Authority

FM broadcasting services band in the Perth RA1 licence area

I refer to the ACMA's options paper in relation to potential replanning of FM frequencies in the Perth RA1 licence area.

Southern Cross Austereo (SCA) operates two commercial FM radio licences in the Perth RA1 licence area, Mix 94.5 and Triple M 92.9.

In SCA's view, any benefits from potential replanning of FM frequencies in the Perth RA1 licence area would be outweighed by the detriments, including disruption and associated costs for incumbent radio broadcasters. This is with the possible exception of option 4 which would have the least impact on incumbent radio broadcasters.

Options 3 and 5 (and to a lesser extent, option 2) would have the additional effect of allowing new high-power/wide coverage services. SCA believes these options would carry significant risk and cost for incumbent broadcasters without significant countervailing benefits for the community. The Perth RA1 licence area is already well-served by diverse radio offerings by the commercial radio sector, ABC and SBS, community broadcasters and narrowcast licences. The object in the Broadcasting Services Act of promoting the availability of a diverse range of radio services is not fulfilled by allowing an ever-growing number of services at the cost of many of them being unable to operate on an economic basis. There is no unfulfilled need in the licence area for new commercial radio licences.

Allocation of new licences in Perth would also risk setting an undesirable precedent for other licence areas in which there may be available spectrum, but limited audience or advertising revenue available to support additional licences.

In the current economic climate, in which advertising revenues for commercial radio broadcasters are highly challenged, the allocation of new licences in the Perth RA1 licence area and the imposition of additional costs and audience and revenue risks associated with replanning frequencies will have a negative impact on the development of an efficient, competitive, responsive, high quality and innovative broadcasting industry in that licence area, without an obvious countervailing benefit for the local community.

Finally, we noted comments in the options paper that options 1 and 2 would align with the ACMA's understanding of the ABC's radio planning priorities. In SCA's view, the ABC's radio planning

priorities should not be a relevant factor in the ACMA's policy decisions that affect commercial, community, and national broadcasters.

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