



**Submission re
FM BROADCASTING SERVICES BAND
IN THE PERTH RA1 LICENCE AREA**

Date: 22 June 2021

ANRA welcomes the opportunity to submit its views in regard to the FM Broadcasting Services Band in the Perth RA1 licence area. Our comments reflect a consensus of our membership. However individual members may make their own submissions.

ANRA, the Australian Narrowcast Radio Association, is the peak industry body representing Low Power Open Narrowcast (LPON) Radio services and High Power Open Narrowcast (HPON) Radio services located across all States and Territories of Australia. Our membership includes the major Narrowcast radio program providers such as the TAB agencies and organisations, foreign language groups, fringe music services, tourist services and religious services, as well as many other independently owned and operated services.

(1) ANRA's first priority is that, when spectrum is being made available especially for the migration of AM services into the FM band, that provision be made for a Racing and Wagering Western Australia (RWWA) metropolitan HPON licence...TABradio 1206AM.

Supporting this request are background AM reception issues highlighted in the ACMA document which compromise the RWWA broadcasting service.

As stated In 1998 a Parliamentary Inquiry concluded that a racing service was extremely important to regional Australia. Many areas rely on their local Narrowcast stations to provide a racing/sport service which is not available on regular National or Commercial stations.

(2) ANRA has been advised by its members that other operators would be keen to have HPON services made available through the PBA auction process. Could the ACMA clarify if it is intended to open up any additional FM frequencies for HPON or LPON services in Perth.

(3) ANRA would request that the Drop Through frequencies of 87.5MHz to 88.0MHz be protected against any proposed changes.

(4) ANRA would request that consultation and discussion take place with ANRA and HPON operators in Perth who may be affected by proposed changes, especially if a change of frequency is required which could involve rebranding issues.

ANRA thanks the ACMA for the opportunity to submit the above comments in regard to the **FM broadcasting services band in the Perth RA1 licence area** and looks forward to a continuing and positive dialogue.

Phil Edwards
President
Australian Narrowcast Radio Assn
31.05.2021

Angelo Nacson
Secretary
Australian Narrowcast Radio Assn
31.05.2021