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6th June 2021
The Manager,
Broadcast Spectrum Planning Section
Australian Communications and Media Authority,
PO Box 78,
Belconnen
ACT 2616

Dear Sir, **RE CHANGES TO THE PROPOSED FREQUENCY OF
WESTERN SPORTS MEDIA (SPORT FM 91.3)**

The Board of SportFM 91.3 are vehemently opposed to moving from our current band SportFM 91.3 to another band. A survey that was conducted by CBAA in November 2019, recorded the following information for SportFM 91.3.

SportFM 91.3 had a daily audience of 78,420 listeners at some stage of the day, every day.

The average age of the listeners was 42 years.

The average listening time each week for each listener was 15 ½ hours per week.

88 % of the survey were very happy with the content and did not want anything to change.

12% of the listeners wanted minor changes to some of our programs, but were still happy to continue as listeners. Some of the requests we have been able to do to keep our listeners happy.

67% of our listeners own their own home.

65% of our listeners are male and 35 % are female .

It has taken us 15 years to build up this radio station and market the name **SportFM 91.3 under the SportFM 91.3 logo** , which is registered and recognized by listeners worldwide. We have spent thousands of dollars on signage flags , signs on our building, sporting grounds such as the WACA, football grounds such as Perth, South and East Fremantle Football Clubs, Doubleview and Osborne Park Bowling Clubs. Bumper stickers shirts and hats for our members , stationary and signage. It has taken years for SportFM 91.3 to build up listeners , and encourage them to use our website www.sportfm.com.au to listen to programs and 'live ' sporting action if they are unable to get reception . We have listeners all around Australia and around the world contributing to our audience . We average over 2,000 hits per day on our website, and a lot of SMS messages daily. This result has only been achieved by providing good programs, hosted by competent presenters .

SportFM 91.3 has attracted Sponsorship by business owners who like the programs and trust us to advertise their business , these Advertising Sponsorships has kept SportFm 91.3 afloat and we were able to keep the station active., especially during Covid-19 . I must say that during Covid -19 we lost a lot of sponsorships around 50% , this meant we lost 50% of our income ; Our remaining loyal advertisers stuck with us even though they were experiencing severe difficulties themselves during the pandemic. These Sponsors had the confidence in us as a radio station to deliver their message which in turn , helped them attract sales to survive the pandemic . One of our sponsors Holman Garden Products who sell to Bunnings said " We personally need you to stay on air for the Community needs, this is why we have stayed on to support you, because you support us" We were lucky to be helped by CBAA with two small grants which also helped to keep the station going.

As we are renowned for being a training facility at SportFM 91.3 we are proud of some of our achievements, for the successful training of young students, some of these students have gone on to bigger and better opportunities at the ABC, Channel 7, Fox Sports 6PR radio just to name a few. Currently, ABC Perth, ABC Melbourne and ABC Sydney all employ our former students, and the names of these students can be supplied if required.

During Covid-19 lockdown, we have managed to keep our staff with the help of job seekers and the generosity of our loyal volunteers and student workers. Because of this, we were able to keep SportFM operating to full capacity. Our listeners through talkback and SMS messages increased dramatically, as people were spending more time at home: The listeners had communication with the outside world, and we gave them up to date news, and sporting entertainment over this time. We provided the general public with a station that they could tune into and listen to their favorite sports during lockdown and hard times. This also helped SportFM 91.3 as we got a lot of 'new listeners' over the pandemic period, who have stayed with us.

We were also able to help other Community Radio Stations around Australia by supplying them with some of our programming content to help them fill their timeslots during Covid-19. Some of these radio stations are still taking our programs today. We have delivered and supported sport never covered by other media through SportFM 91.3, a frequency that we have built on by marketing the name and logo SportFM 91.3. This comes at an expense, and another expense if we have to start all over again marketing a new frequency?

Apart from our regular programs, we broadcast National Sheffield Shield Cricket, One Day 'Marsh' Cup games, across Australia and through Cricket Australia's website, and Cricket Australia take our 'live' broadcast call which is generated around the world, from which we get many hits on our world wide website www.sportfm.com.au We also get many emails from around the world to info@sportfm.com.au thanking us for the cricket coverage,

We do broadcast other 'live sports apart from cricket, we broadcast AFL Football through the **National Indigenous Radio Service** , again around Australia and the world, and we take the National Rugby league Coverage from

2 GB in Sydney for Rugby league fans on Friday , Saturday and Sundays during the season. May I point out that our coverage is also listened to by fans through our worldwide website www.sportfm.com.au across Australia and around the world especially ex pats living worldwide, who crave sports news from Australia. We are the only FM 24/7 dedicated Sports Station in Western Australia. Where sports fans can tune in every day listening to sports, and if they miss the program they can tune into our website and get the program off our podcasts, this has taken us years to achieve!.

I note with interest, that you have allocated 91.3 FM to a Commercial Radio Station ? Is there a reason why we can't operate as a Community radio station on the same band SportFM 91.3 ?

As I understood , 91.3 FM was a Community Station Band? Does this mean that we have been operating on Commercial Band for all this time? So why is it suggested that we change? If we get another frequency, then we would need the change to be an increase in power to 1,000 watts OMNI directional to meet our current broadcasting area requirements.

Our station Engineer Dr Ted Walker (B.App.Sc.M.App.Sc.Ph.D) has 50 years experience in radio operations giving technical radio and television support , he has given me this report to pass on to you:-

REPORT: Dated 5/6/2021

Technical consideration to the proposed frequency change of 6WSM Fremantle from 91.3 Mhz Transmission from the Fremantle Community Radio Site in Pier Street East Fremantle to a frequency of 107.0 Mhz.

Calculations and field measurements across the two broadcast licence areas in the past have shown FM capture of the two broadcast frequencies 107.9 FM 6CCR(Radio Fremantle) and 107.3 FM 6HFM (

Heritage FM) does indeed cause a reception problem for both broadcasters. This FM Capture results in a listener being tuned to one station then suddenly jumping onto the other stations transmission and receiving it in full audio clarity. This will be a severe problem for 6WSM should it broadcast on 107.0Mhz with HFM currently broadcasting on 107.3 MHz.

Additional Calculations and field measurements at the site in Pier Street for 2F1- F2 intermodulation generated products in the outputs of the two transmitters sharing the Star Combining Filter at the Pier Street Community site has revealed that at least 2MHz separation between the two frequencies sharing the broadcast antenna array is required with the 3 pole combining filter to prevent unwanted intermodulation frequencies being of significant level being broadcast on other bands; the Aviation Frequency Band in particular. This potential problem needs evaluation before any change to a new frequency (such 107.0 Mhz) is applied to the array after tuning the 3 Pole filter. A new combining filter may be required that can separate the two close frequencies of 107.9 Mhz and 107.0 Mhz at some considerable cost (if technically possible to design this filter) If you wish to discuss this further for more technical information, Dr Ted Walker is happy to talk to you his contact details are - Mobile 0418 941 418 or email wamedia@radiofremantle.com

If we have to change frequency as a last resort, then we would need at least two months warning prior to the changeover . This would hopefully mean that our listeners would be well informed before the move, so we do not lose any listeners because of this change of frequency? We would advertise a promo for instance, if we were to be allocated 89.3 Mhz as an example "We are moving on the (date) Tune into our new dial SPORTFM 89.3 " and you will not miss a thing! We also need to inform our Sponsors, well ahead of time so that they can be reassured that the radio station will not lose any less power and hopefully gain increased power to 1,000 watts. We feel threatened that we could lose Sponsors by moving to another frequency this is why we are objecting to moving.

The Western Sports Media Board and I repeat, that if we have to shift off our band SportFM 91.3 a band which we have strongly marketed is well known

and respected by our listeners worldwide, because of the many years of work put into marketing the station, that we secure in its place an increase in power on **89.3 Mhz** .

We have already shifted once as we operated on 90.5 SPORT FM before we were given 91.3 SPORT FM , and this caused us no end of stress at the time , we lost listeners , and it took some listeners a long time to find us again on the dial. So we are well aware what a change in frequency could do to the station and listeners who enjoy our programs. So in summary, SportFM 91.3 would like to remain SportFM 91.3 because it will cost us a lot of money to re-brand again and we know we could potentially lose some our SportFM 91.3 audience, and we also know that they would be outraged at this change. If you require any further information, please do not hesitate to contact me on 0418 912 085 at any time. My personal email is cmpromotions@bigpond.com

Kind regards



Colin Minson
Chairman
Western Sports Media Inc.