

Friday 17th July 2020
HHCRA
02 45782797
Response

Dear Sir/Madam

We wish to offer the following comments regarding the possibility of the four current aspirants merging voluntarily:

1. In our email to the other three aspirants dated 13th June, we proposed a merger. None of the three responded.
2. We subsequently received an email from HRCA dated 16th June, proposing a meeting of all aspirants. We responded, suggesting the conference be conducted via ZOOM, both to avoid COVID issues, as well as avoid an eruption of past animosities. Our proposal of a ZOOM meeting was ignored by all aspirants.
3. [REDACTED]
4. After HRCA's Licence was refused renewal, many long-suffering frustrated members decided to form a new Association (Harmony, or HHCRA) to apply for the Licence. We felt this was the only way to restore a competent, reliable, high quality COMMUNITY oriented radio service.
5. HHCRA members have provided more than \$100,000 to establish state-of-the-art studio, broadcast, and transmission facilities. When we commenced operations we were aware of the existence of the three other aspirants, but based on our knowledge of their technical and management capacities, we were confident that we could out-perform them in terms of fulfilling the ACMA's community radio requirements.
6. We understand that HRCA was originally granted a TCBL only because other aspirants were not ready to commence transmissions at the time. However, that is no longer the case due to our own proven capability.
 - We have not suffered any downtime during our broadcast times to date
 - We have conducted more outside community broadcasts than the other three aspirants combined
 - Our transmissions can be clearly heard right throughout Windsor RAI

- We welcome all new members and are committed to operating in the best interests of our community
- We are constantly approached by community groups to record their CSAs.
- We have a policy of interviewing community leaders and service providers in the one day we currently operate each week
- Our Association operates as it is named, in “Harmony”

Now that the four aspirants have been broadcasting for up to 32 months, it is evident that we are the only TCBL holder that is complying with the ACMA’s standards.

- Two of the aspirants (**HVCR** and **CAMS**) suffer constant broadcast downtime, and their signal cannot be heard in large areas of the Windsor RAI.
- **HRCA**, we say should not be granted a further TCBL based simply on the provisions of the BSA. If **HRCA** have the problem of ever being granted another **long-term** community Broadcasting Licence, then **Part 6A of the Broadcasting Services Act 1992** states clearly the reasons why a TCBL is granted. In the above reasons stated, we believe it would be illogical to grant a further TCBL to HRCA.

We believe we have more than met the criteria outlined under **Part 6A of the Broadcasting Services Act 1992** that deals with who may apply to the ACMA for a TCBL. We have indeed demonstrated broadcasting skills in preparation for a merit-based allocation of a long-term community broadcasting licence.

Unfortunately, the haphazard operation of TCBL holders over the past 32 months has driven many listeners away from community radio. Few listeners persevere when all they can receive is static several days a week. At Harmony we understand we have a huge job ahead to rebuild the audience if granted a sole Licence.

In summary, for the many reasons outlined above, we believe that a voluntary merger of the four aspirants is an IMPOSSIBILITY.

Importantly, community radio in the Windsor RAI will never be acceptable to the community with the continued presence of HRCA.

Regarding the switching on/off of a transmitter, a timing device is employed that does not require physical attendance, so midnight/midday has no effect.

Thanking you and hoping everyone is safe

Graham Webb
President HHCRA
02 45782797