

Dear Sir / Madam

Thank you for the chance to comment on the Extension of Spectrum Availability for the LPON service. I'll be answering the four questions directly. Then adding additional comments to expand on my reasons further below.

Question 1

Are there any alternative broadcasting or non-broadcasting uses of the sub-band spectrum (87.5–88.0 MHz) that we should be aware of?

No

Question 2

Should we make a new determination for LPON services later this year to extend the availability of spectrum for LPON services beyond 31 December 2025?

Yes

Question 3

If the answer to question 2 is 'yes', what would be an appropriate duration for the determination?

10 years

Question 4

How often should we conduct our periodic reviews on spectrum availability for LPON services?

10 years

Additional Comments

Q1

In addition to this question.... while not within the scope of this discussion paper. At some point ACMA should look at extending the FM band down to accomodate new digital broadcasting services. Such as DRM+ I'm sure with a bit of forward thinking this can mean LPON's can stay too.

Q2

While LPON services are issued on a buyer beware basis there are still financial commitments behind running them. Anything that offers some sort certainty is welcome.

Q3

Na

Q4

Na

Final comment

Under no circumstances should the ACMA consider any suggestion that takes lead from the NZ low power model. The benefit of our model (within it's original intended design) has some sort of "this is my area" to it. Where as the NZ model will allow 2 services separated by 100khz to be on opposite sides of the fence. Rendering the coverage of both useless. The point is not lost on me that there are way more low power channels in the NZ system to offset this.

It's here that I would also like to suggest that ACMA considers adding 88.2mhz and 88.4mhz to the Australian system. All distances apart and power levels remain. With most VHF TV gone and only a few places in Australia where high power FM services are on 88.5 mhz... I feel this is worth consideration to add more availability to our system.

It's become very clear to me that some LPON operators have become well respected within the towns that they operate. The LPON service does offer the chance for a town to have a service, where as more expensive options would not be viable. It would be a shame to see them stop.

Regards

Peter Tate
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