

SUBMISSION TO THE ACMA
LPON Questionnaire

Submitted by – J-AIR (Jewish Australia Internet Radio) 88FM.

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?

There are no other uses we are aware of for the FM sub-band as it stands at the moment.

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?

Absolutely! Of course!

Question 3

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

The maximum allowable. The s34 Determination mentions a maximum of five years, however we would like to see a duration of at least ten years, to enable long-term planning.

Question 4

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

Rather than annually, maybe look at, say, three or four-yearly intervals.

The annual review is an onerous imposition on the management of community radio stations, considering that most of the members are volunteers and that, to ask them to be involved in licence reviews, may be asking too much of the volunteers.

What I'd like to suggest, if possible – is an increase in transmitted power.

The background notes mention '... The (LPON) power limitations are a maximum of 1 watt effective radiated power in residential areas and 10 watts in non-residential areas'.

I would suggest that the Effective Radiated Power in residential areas be increased to overcome the heightened noise floor (ie radio frequency interference) which is present and all-pervading as more and more 'noisy' electronic equipment enters the marketplace.

Thankyou for the opportunity to submit

Sean Meltzer

President

Jewish Community Radio Vic. Inc. J-AIR88FM

www.j-air.com.au