



25 January 2023

Australian Communications and Media Authority  
Via ACMA Website Submission

**ABC submission to the ACMA regarding:**

**Proposal to vary the Tamworth licence area plan - consultation 41/2022**

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to respond to the above consultation which was released by the Australian Communications and Media Authority (ACMA) in December 2022.

While the ABC acknowledges the desire of the licensee of commercial services 2TM and 2TTT to acquire additional FM spectrum to support its goals of improved service through AM to FM conversion and increased coverage area, the ABC remains concerned that allocation of additional spectrum as proposed in Tamworth, or generally, might hinder future planning for services in the FM band, specifically the proposed rollout of the ABC Double J network, the feasibility study for which has yet to be completed.

In addition to the above, in its 2022 submission to the ACMA's consultation on "proposed principles for planning AM to FM conversions in regional licence areas" (consultation 49/2021), the ABC stated its concern that allocation of FM spectrum in the short term might impact future planning involving the FM band, including any potential transition to digital radio technologies utilising FM frequencies and urged that the ACMA pause planning of AM to FM conversions until there is an industry consensus on the future of digital broadcasting.

In light of the above and consistent with Principle 6 of the ACMA's "Principles for planning AM to FM conversions in regional licence areas, September 2022", the ABC proposes that the allocation of additional FM spectrum outlined in Proposal 1 of this consultation be delayed at least until the Government feasibility study concerning ABC Double J is concluded.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gavin Bowman', is written over a small, square, light-colored textured background.

Gavin Bowman  
ABC Transmission Contracts and Licensing