

29 September 2023

Manager, Broadcasting Carriage Policy Section
Spectrum Management Policy Branch
Australian Communications and Media Authority

via on-line submission at:

<https://www.acma.gov.au/consultations/2023-08/proposed-digital-radio-channel-plan-launceston>

Dear Madam / Sir,

Proposed digital radio channel plan for Launceston

BAI Communications Australia (BAI) welcomes the opportunity to provide a response to the Proposal to vary the Tasmania digital radio channel plan for Launceston Consultation paper.

BAI owns and operates an extensive broadcast transmission network, delivering terrestrial television and radio (including ABC, SBS and SCA television and radio services) to approximately 99 per cent of the Australian population.

The existing main steel tower proposed in Appendix A of the Consultation Paper is currently heavily utilised for other broadcast services. BAI does have a short structure to the west of the main tower which we believe will be appropriate to serve the Launceston area given the significant effective height above average terrain (EHAAT) provided by the mountain itself at this location.

Analysis from this structure shows that there would be significant benefit in increasing the allowable maximum ERP to 20 kW, both in terms of improved quality of coverage and reach of coverage within the licence area as shown in the following table.

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Population Served within Launceston RA1

	Mt Barrow (Link Tower)	Mt Barrow (Link Tower)
	5 kW ERP	20 kW ERP
Urban Indoor	28,396	90,817
Suburban Indoor	62,411	16,752
Mobile	13,018	7,120
Total	103,825 (80.0%*)	114,689 (88.4%*)

* BAI Calculated Launceston RA1 population = 129,763 persons

Whilst it is expected that a facility would always be required for the city of Launceston, this higher ERP proposal is expected to reduce the need for (or at least the urgency to) deploy previously foreshadowed repeaters within the licence area.

We note that the use of this higher ERP for the wide area coverage site within the digital radio channel plan is consistent with the maximum ERP used in other non-Metropolitan locations.

If you would like to discuss this submission further, please feel free to contact me.

Kind regards,



Stephen Farrugia

CTO