

8SAT – Flow FM response to the Wangaratta RA1 Variation December 2024

Thank you for the opportunity to comment on new Wangaratta planning. 8SAT is the adjacent licensee to the north of the Wangaratta license at Oaklands and Rand while also adjoining the southern boundary of the Wangaratta license in the mountainous Great Divide Snow Fields at Mt Buller.

Discussion

3NE AM shutdown

In principle, we are supportive of the AM to FM conversion given the licensee is meeting the aim of relieving old AM spectrum and not seeking ongoing AM use as a simulcast which would not meet the ACMA objective of spectrum efficiency. However, we have concern about the selection of the Yarrawonga frequency and the fact that the variation allows overspill into adjacent license urban centre which 8SAT has recently not being allowed to benefit from.

Mt Warby Emoleum Site for 102.1 3NNN and new 92.1 3NE FM

This site appears to meet the objective of minimal overspill toward the 8SAT License Area Plan compared to the 3NNN Mt Stanley site and does not significantly encroach into the 8SAT license at Oaklands, Rand or Urana. However, the town of Cobram (Urban Centre) in the Deniliquin License area and parts of the Shepparton license would receive greater the 54 dBu. This would represent a departure from ACMA robust planning that licenses boundaries and urban centres should be afforded protection. We would seek equity in planning 8SAT licenses and site recent examples of Willmington, Kyalite and Kapunda as examples where 8SAT was required to provide significant protection to the adjacent urban centre or boundary in order to not overspill at 54 dBu. It could be noted that the Yarrawonga infill transmitter may not be required given significant field strengths in the 66 dBu range. By not using that spectrum it would meet the conversion guideline of efficient use of spectrum. Current planning by ACMA for 8SAT in the last 3 months at Lake Cargelligo and Brim has required robust protection of the adjacent boundary licenses despite minimal population overspill. Wangaratta should be required to similarly mask the East and North East profiles by at least 6 dBu.

Yarrawonga 88.9 FM

This site is 47km away from the Flow LAP boundary and planning is 200 kHz away from Flow FM 88.7 FM operational planning at nearby Urana. This represents a serious concern at Oaklands and Rand in receiver interference. ACMA is still finalising an increase in power directionally toward these towns from the Urana service. We would seek that the ACMA allocate a different frequency if the licensee pursues an infill at Yarrawonga.

Wodonga 93.7 FM

This planning does not directly overspill into our license area. However, we are astonished that this planning reached public consultation stage. The ACMA is presenting a plan that designates a transmitter site just 20 metres from the adjacent license boundary. The ACMA's own overspill analysis quotes 8000 people as receiving the service when it appears that possible less than 1000 people would benefit from the Wangaratta infill transmitter.

This represents an unequitable disproportionate departure from zero to very minimal overspill planning and uniform rules under both the Broadcasting Services Act of 1992 and the Technical Planning Guidelines for ACMA commercial radio planning. Wodonga is already serviced by 3 commercial radio licenses. A fourth license appears to being applied for by stealth. This represents individual planning for a licensee and tendering it for public consultation despite clearly not meeting the long held and applied guidelines by the ACMA. 8SAT cites previous planning with ACMA at Freeling SA, Healesville Victoria and Hay NSW where a similar overspill was requested but not approved which leads to further disadvantage for the 8SAT license. We ask that ACMA uphold the same at Albury.

We welcome discussion on this planning and moving forward future projects for 8SAT based on the current guidelines and similar outcomes for overspill pursuant to the Wangaratta planning.

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