



SUBMISSION TO THE AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY
RE PROPOSAL TO VARY THE PERTH AND REMOTE WESTERN AUSTRALIAN
RADIO LICENSE AREA PLANS

The Licensee of 6SEN broadly supports the proposed variation, subject to the finalisation of negotiations currently underway regarding revised transmission infrastructure and transitional arrangements. We expect it may take several months to finalise these matters and will update the ACMA by or before 31 December 2025. It would not be appropriate for the ACMA to finalise these changes to the Perth radio LAP until after we are able to advise negotiations are finalised to the satisfaction of 6SEN.

The Licensee of 6SEN, while broadly supporting the proposed variation, has also asked that I submit the following for your consideration:

1. The variation proposed by ACMA for 6SEN to relocate to the BAI site at Bickley has limits on the HRP to a maximum ERP described as;

0°T to 70°T	16 kW
70°T to 180°T	400 Watts
180°T to 210°T	2 kW
210°T to 360°T	16 kW

We accept that the 16kW ERP provides sufficient coverage for the Perth RA1 License Area, but we are concerned that the reductions in coverage in the arc from 70 – 180 degrees (400Watts) and the arc from 180 - 210 degrees (2kW) are considerably deeper than for any other licensed community service radio station operating in the Perth RA1 licence area. Specifically, where we are reduced to 400Watts, other stations have 4kW and where our reduction is down to 2kW, the other community stations are only down to 8kW.

2. We suggest that the specifications used for the other community stations as outlined above, should also be applied to 6SEN. Were this to be done, we would consider accepting a condition which provides the flexibility to



instead operate with a deeper reduction in the HRP, if that were considered necessary.

3. To enable further consideration of our position, we respectfully ask ACMA to provide the following information.
- Estimates of the population counts in each of the arcs where coverage limits are to take effect namely, the 70-180 arc and the 180-210 arc.
 - Estimates of the (average) number of users of radio in the aforementioned arcs, including transport, commuters, tourists and others.

Again, we are supportive of the proposal but would appreciate you taking our concerns into consideration and look forward to your response in due course.

Yours sincerely

Rob Dicker-Lee
For 6SEN