



Perth Draft Licence Area Plan and Remote WA Licence Area Plan

ABC Submission – 26 September 202

Executive Summary

The Australian Broadcasting Corporation welcomes the opportunity to provide comment on the draft Perth Licence Area Plan and the draft Remote Western Australia Licence Area Plan.

The ABC supports Proposals 1, 2, 3 and 6. Proposals 1, 2 and 3 will enable the Corporation to provide its three current Perth AM services (ABC Radio Perth, Radio National Perth and ABC NEWS radio Perth) on FM.

Proposals 1 and 2 are also supported as they will additionally permit the Corporation to cease AM transmissions for ABC Radio Perth and Radio National Perth after a suitable simulcast period. ABC will broadcast Parliament on AM and FM while the *Parliamentary Proceedings Broadcasting Act 1946* requires it and therefore supports Proposal 3 as it permits continuation of ABC NEWS radio services on AM while this obligation exists.

The ABC has been working closely with all broadcasters affected by Proposals 1, 2 and 3 to ensure that these broadcasters can make the transitions required with minimum impact.

The Corporation does not object to Proposals 4 or 5.

The ABC supports proposal 6 as a necessary outcome of the adoption of Proposals 1, 2 and 3. The existing ABC FM services of triple j and ABC Classic will need to have their technical specifications adjusted to accommodate the new services that will commence once Proposals 1, 2 and 3 are finalised.

Introduction

The Australian Broadcasting Corporation welcomes the opportunity to present a submission on the draft Perth Licence Area Plan and the Remote Western Australia Licence Area Plan. These draft Plans follow the ACMA's Options paper "FM broadcasting services band in the Perth RA1 licence area" released by the ACMA in April 2021.

The challenges facing broadcasters on AM in metropolitan radio markets are well documented, including in the ACMA's March 2020 report to the Minister on "The future delivery of radio". These challenges include the impact of electrical noise interference, arising from the build-up of devices in urban areas, and the declining inclusion of AM radios in electric vehicles (which are themselves a source of AM interference). The Corporation notes that AM's challenges have only become more entrenched in the five years since the 2020 report to the Minister.

In addition, the Perth market faces additional challenges to AM's performance, due to poor soil conductivity and high levels of man-made interference arising from electric rail infrastructure directly alongside major commuting corridors.

The FM bands do not suffer from the same audio quality drawbacks that affect the AM bands. Notably, the existence of man-made electrical noise does not adversely affect FM audio quality, and car manufacturers largely still support FM radio in-car.

In June 2021, the Corporation submitted to the ACMA's discussion paper process that it supported the conversion of all AM services in Perth to FM.

As part of this Licence Area Planning process, the ABC reiterates it seeks the conversion of three national Perth AM licences: ABC Perth, Radio National and ABC NEWS radio. These three licences are currently broadcasting on various frequencies and power levels in the Perth market and the ABC supports establishment of all three on FM under Proposals 1, 2 and 3 of the draft Plans. Conversion of all three services to a common FM platform on equal power, as outlined, meets the public interest test in the *Broadcasting Services Act 1992*.

Since the switch-off of analog television services in Bunbury, the availability of scarce FM spectrum to serve the Perth market has improved. This unique opportunity has been known to the ABC since 2013.

In preparation for the proposed ACMA Licence Area Plan variation, the ABC commissioned major field studies in the Southwest Western Australia region to determine reception of AM and FM services. The Corporation has continued its extensive field work as part of its commitment to ensuring the impact of establishing these new FM services in the region would be well understood, its own coverage would be maximised, and adverse consequences minimised.

Following the ACMA's advice on 14 September 2022 that it would proceed to consider allocation of new FM services for the Corporation's three existing Perth AM services, the ABC commenced working with broadcasters identified as affected in the ACMA 2021 Options Paper to be ready for the Licence Area Planning process.

The ABC has now concluded arrangements with all affected broadcasters, enabling the establishment of all three new FM services to occur without interference. The Corporation has also engaged its transmission infrastructure provider, BAI Communications, to make the necessary changes to its infrastructure to enable these FM services to commence.

Proposal 1. 6WF (ABC Radio Perth)

1.1. Make FM spectrum available to enable the ABC national radio broadcasting service 6WF in Perth to convert transmission from AM to FM

The Australian Broadcasting Corporation supports the ACMA proposal to make spectrum available to ABC's 6WF service to transmit on 102.5 MHz from the Tower Broadcast Site Television Rd, BICKLEY (the Bickley site) using an omnidirectional radiation pattern with a maximum effective radiated power (ERP) of 100 kW.

Since 1961, the ABC has been operating the current 6WF service using the AM band on frequency 720 kHz with a maximum cymomotive force (CMF) 2.9 kV OD using a 50 kW transmitter as per the current operating parameters. Previously, from 1929, the ABC used 690 kHz to transmit its ABC Radio Perth radio service using the Wesfarmers site (established in 1924), but at lower power levels. The ABC moved to the current Hamersley site in 1932, operating a 3.6 kW transmitter to serve the Perth audience until increasing operational power to current levels in 1961.

The ABC is committed to continuing to provide appropriate and engaging local radio content to the Perth audience and welcomes the opportunity to do this using 102.5 MHz. Operating at an ERP of 100 kW from the Bickley site will enable the ABC to reach as many of its previous audiences as possible.

1.1.1. AM / FM coverage comparison

The Corporation has conducted its own assessments of the coverage of the current 720 kHz service and proposed 102.5 MHz service and agrees that the Perth metropolitan area (which ABC assumes the ACMA is equating with the Perth RA1 area) will be well served by the FM service once ABC Radio Perth is converted. The Corporation expects all listeners in the Perth RA1 area will be able to tune to 102.5 MHz to continue to enjoy ABC Radio Perth when on FM.

For those listeners seeking to tune to ABC Radio Perth south of the Perth RA1 area, the Corporation's modelling suggests the number of people unable to tune to 102.5 MHz, but who can currently tune to 720 kHz is approximately 149,000. The ABC understands that the audience of ABC Radio Perth outside of the Perth RA1 is less than the full number of people who reside in those regional areas. Combining the modelling above with recent audience survey results suggests that listeners further south of Perth are less likely to continue to seek access to ABC Radio Perth; ABC estimates 2,000 people are exclusive listeners to ABC Radio Perth via 720 kHz, but are unlikely to be able to listen via 102.5 MHz in this area.

The Corporation notes the ACMA has identified Bunbury and Busselton as cities that are "well outside" the 6WF 720 kHz service area. The Corporation understands ACMA's use of **service area** refers to the *Radiocommunications Licence Conditions (Broadcasting Licence) Determination 2025*, which relevantly provides that a:

service area for a radiocommunications transmitter, means:

- (a) if the licence that authorises operation of the transmitter specifies a coverage area for the transmitter – that coverage area; or

- (b) otherwise – the area in which the median field strength of the transmitter is equal to, or greater than, the planned minimum field strength for the transmitter.

Corporation modelling for 720 kHz 6WF service shows Bunbury and Busselton are within the planned minimum field strength for this transmitter. Despite this, the ABC Radio Perth service content is primarily targeted to listeners within the Perth RA1 and Bunbury and Busselton are well outside of the Perth RA1. Modelling also shows that there are no listeners currently able to tune to 720 kHz who would not be able to tune to an alternative and regionally appropriate ABC Radio service (ABC South West WA on Bunbury 684 kHz).

In the east and north areas outside the Perth RA1 area, the Corporation's modelling suggests the number of people unable to tune to 102.5 MHz, but who are currently able to tune to 720 kHz is approximately 22,900. Combining the modelling above with recent audience survey results suggests that listeners further east and north of Perth are less likely to continue to seek access to ABC Radio Perth; ABC estimates 400 people are exclusive listeners to ABC Radio Perth via 720 kHz, but are unlikely to be able to listen via 102.5 MHz in this area.

The ABC acknowledges that while its ABC Radio Perth service on 720 kHz is currently producing content that is targeting the Perth metropolitan area (the Perth RA1 licence area), some listeners outside of the Perth RA1 boundaries nevertheless choose to tune in. These listeners will be able to continue to tune to ABC Radio Perth content via alternative technologies, such as via the ABC Listen App where mobile reception is available, or via ABC radio on TV if in the home (channel 25).

1.2. Vary the existing 6WF AM technical specification so that it will cease to have effect 8 weeks after commencement of the 6WF FM technical specifications

The Corporation notes the ACMA proposal to allow ABC Radio Perth a simulcast of up to eight weeks, commencing after the four affected broadcast services (6KCR, 6SEN and 6FMS in both Lancelin and Leeman) have transitioned to their new technical specifications.

While the Corporation is not currently planning to utilise the full eight-week simulcast period for ABC Radio Perth, it believes that the proposal to allow up to eight weeks is appropriate given timing uncertainties in commencing service may require a flexible approach to simulcast duration.

1.3. Vary the technical specification for the community radio broadcasting service 6SEN in Perth to address potential interference issues resulting from the conversion of 6WF to an FM service

The ABC supports the ACMA amending 6SEN's technical specifications in accordance with the draft Perth LAP.

The Corporation has been proactive in working closely with 6SEN to enable its transmissions to occur from the Broadcast Australia Bickley transmission site on Television Road instead of the current Gosnells site at Mills Road. The ABC understands that the site move, together with a power increase from 8 kW to 16 kW, is required to

enable ABC Radio Perth to transmit on 102.5 MHz without causing interference to 6SEN's transmissions.

The ABC has facilitated access to the Broadcast Australia Bickley site for 6SEN, and understands that works are well progressed to enable 6SEN to transmit from the site as soon as licences are allocated, assuming these licences conform to the technical specifications as set out in the draft Perth LAP.

1.4. Add new technical specifications for the community radio broadcasting service 6KCR in Kalamunda that will facilitate the FM conversion of 6WF

The Corporation has been working closely with 6KCR to facilitate the changes to the frequency of its service that would be required to enable ABC Radio Perth AM / FM conversion to occur.

The ABC understands that 6KCR is not currently broadcasting on 102.5 MHz, due to issues with the site from which it previously operated.

While the Corporation does not believe that the site or service changes (besides frequency reallocation) that have been requested by 6KCR are necessary to enable ABC Radio Perth to transition to FM, the ABC will continue to work closely with 6KCR to ensure the location proposed by 6KCR for the establishment of their community service is technically capable of broadcasting on the new frequency.

The ABC has no comment on the suitability or appropriateness of the other changes that are requested by 6KCR. However, all assistance has been provided by the Corporation to ensure that, if approved, 6KCR will be able to operate on the new frequency and from the new location with the approved technical specifications as have been requested.

1.5. Vary the existing 6KCR technical specification so that it will cease to have effect 8 weeks after commencement of the new 6KCR technical specifications

The Corporation notes ACMA has proposed up to eight weeks for 6KCR to complete its transition from 102.5 MHz to 88.9 MHz. The ABC does not believe a simulcast will be required unless 6KCR has resumed transmissions on 102.5 MHz prior to the commencement of service on 88.9 MHz.

The Corporation notes that some additional transition costs may apply in the event that service is established on 88.9 MHz due to the space restrictions at the Koster Reserve Oval Light Tower site on the corner of Recreation Road and Canning Road Kalamunda.

The ABC therefore requests ACMA expedites the Perth planning process to minimise any delays in establishing service on 88.9 MHz so that the additional transition costs can be minimised or eliminated.

1.6. Add a new technical specification for the 6FMS commercial radio broadcasting service in Lancelin, to facilitate the FM conversion of 6WF

The Corporation has been working closely with 6FMS Lancelin to facilitate the changes to the frequency at the site location proposed in the draft Remote WA LAP.

The ABC supports locating 6FMS Lancelin at Council Site Nilgen Rd, NILGEN at an ERP of 150 W and antenna height of 40 m in accordance with the proposed technical specifications in the Remote WA LAP. The Corporation acknowledges that the frequency change to 102.9 MHz is required to enable its service to commence transmissions.

1.7. Vary the existing 6FMS technical specification in Lancelin so that it will cease to have effect 8 weeks after commencement of the new Lancelin 6FMS technical specification

The Corporation notes ACMA has proposed up to eight weeks for 6FMS Lancelin to complete its transition from 102.3 MHz to 102.9 MHz.

The ABC has made arrangements with 6FMS Lancelin to facilitate a simulcast period at the technical specifications proposed in the draft Remote WA LAP. The service can commence its simulcast as soon as licensing arrangements are made, on the assumption that the licences, once granted, conform to the current technical specifications as outlined in the draft Remote WA LAP.

Given the Corporation cannot commence its own transmissions until after the 6FMS simulcast has concluded, the ABC requests issue of the licences in a timely manner.

1.8. Vary the technical specification for 6FMS in Leeman, to facilitate the FM conversion of 6WF

The Corporation has been working closely with 6FMS Leeman to facilitate the changes to the maximum ERP and site location of its service that would be required to enable ABC Radio Perth AM / FM conversion to occur.

The ABC supports location of the 6FMS Leeman service at Broadcast Site, Indian Ocean Drive, LEEMAN at an ERP of 100 W and antenna height of 15 m.

Proposal 2. 6RN (Radio National Perth)

2.1. Make FM spectrum available to enable the ABC national radio broadcasting service 6RN in Perth to convert transmission from AM to FM.

The Australian Broadcasting Corporation supports the ACMA proposal to make spectrum available to ABC's 6RN service to transmit on 103.3 MHz from the Tower Broadcast Site Television Rd, BICKLEY (the Bickley site) using an omnidirectional radiation pattern with a maximum ERP of 100 kW. The 6RN service is currently transmitting ABC's Radio National service.

In 1938, a national broadcasting service on 810 kHz commenced broadcasting from the Perth GPO building using a 500 W transmitter. Since 1953, the ABC has been operating the current 6RN service using the AM band on frequency 810 kHz from the present site. Services were subsequently increased so that 810 kHz transmitted using a 20 kW transmitter to achieve a maximum CMF of 1.97 kV OD. The Corporation is currently using 810 kHz to transmit its ABC Radio National AM radio service for Perth.

The ABC is committed to continuing to provide Radio National content, bringing Australia's biggest conversations to the Perth audience and welcomes the opportunity to do this using 103.3 MHz. Operating at an ERP of 100 kW from the Bickley site will enable the ABC to reach as many of its previous audiences as possible.

2.1.1. AM / FM Coverage Comparison

The Corporation has conducted its own assessments of the coverage of the current 810 kHz service and proposed 103.3 MHz service and agrees that the Perth metropolitan area will be well served by the FM service once ABC Radio National Perth is converted. The Corporation expects all listeners in the Perth RA1 area will be able to tune to 103.3 MHz to continue to enjoy ABC Radio National Perth when on FM.

For those listeners seeking to tune to ABC Radio National Perth outside of the Perth RA1 area, the Corporation's modelling suggests the number of people unable to tune to 103.3 MHz, but who can currently tune to 810 kHz is approximately 12,000. The ABC understands that the audience of ABC Radio National 810 kHz Perth service outside of the Perth RA1 is less than the full number of people who reside in those regional areas. Recent audience survey results suggest the number affected is approximately 375.

Modelling also shows that there are no listeners currently able to tune to 810 kHz who would not be able to tune to an alternative ABC Radio National service (Bunbury via 1269 kHz and Dalwallinu via 612 kHz).

2.2. Vary the existing 6RN AM technical specification so that it will cease to have effect 8 weeks after commencement of the 6RN FM technical specifications.

The ABC notes the ACMA proposal to allow a simulcast for ABC Radio National on 810 kHz and 103.3 MHz of up to eight weeks, to commence after the affected HPON service currently on 103.3 MHz has transitioned to its new technical specifications.

While the Corporation is not currently planning to utilise the full eight-week simulcast period for ABC Radio National Perth, it believes that the proposal to allow up to eight weeks is appropriate given timing uncertainties in commencing service may require a flexible approach to simulcast duration.

2.3. Add a new technical specification for the high-powered open narrowcasting (HPON) service currently broadcasting on 103.3 MHz in Perth City to allow a frequency change that will facilitate the use of the 103.3 MHz frequency by the ABC 6RN service.

The Corporation has been working with the HPON service in Perth to facilitate the changes to the frequency of its service that would be required to enable ABC Radio National Perth AM / FM conversion to occur.

The ABC understands that the technical preparations for the frequency shift to 106.5 MHz is complete, with commencement of service on 106.5 MHz possible from the date licences are granted.

2.4. Vary the existing technical specification for the HPON service currently broadcasting on 103.3 MHz so that it will cease to have effect 8 weeks after commencement of the new Perth City HPON technical specification.

The Corporation notes ACMA has proposed up to eight weeks for the HPON currently using 103.3 MHz to complete its transition from 103.3 MHz to 106.5 MHz.

The ABC has made arrangements with the Perth HPON to facilitate a simulcast period at the technical specifications and the location proposed in the draft Perth LAP. The service can commence its simulcast as soon as licensing arrangements are made, assuming that the allocated licences conform to the technical specifications outlined in the draft Perth LAP.

Given the Corporation cannot commence its own transmissions until after the HPON simulcast has concluded, the ABC requests issue of the licences in a timely manner.

Proposal 3. 6PB (ABC NEWS radio Perth)

3.1. Make FM spectrum available to enable the ABC national radio broadcasting service 6PB in Perth to broadcast in both AM and FM.

The Australian Broadcasting Corporation supports the ACMA proposal to make spectrum available to ABC's 6PB service to transmit on 104.1 MHz from the Tower Broadcast Site Television Rd, BICKLEY (the Bickley site) using an omnidirectional radiation pattern with a maximum ERP of 100 kW.

Since 28 November 1988, the ABC has been operating the current 6PB service using the AM band on a frequency of 585 kHz with a maximum CMF of 1.21 kV OD. The Corporation is using 585 kHz to transmit its ABC NEWS radio service for Perth, which also carries parliamentary broadcasts via medium-wave in compliance with the *Parliamentary Proceedings Broadcasting Act 1946*.

3.1.1. Parliamentary Proceedings Broadcasting Act 1946

The ABC acknowledges that the *Parliamentary Proceedings Broadcasting Act 1946* (PPBA) requires continuation of a medium-wave frequency for the broadcast of the proceedings of Federal parliament.

The ABC agrees with the ACMA proposal for the 585 kHz to continue for the purposes of fulfilling this obligation.

The ABC will also, in addition to its obligations under the PPBA, broadcast the proceedings of Federal Parliament on both the 104.1 MHz service and 585 kHz so long as there is an obligation to transmit in medium-wave.

3.1.2. AM / FM coverage comparison

The Corporation notes that the ACMA does not have access to the coverage contours of the current 6PB service on 585 kHz. For completeness, the ABC provides these below:

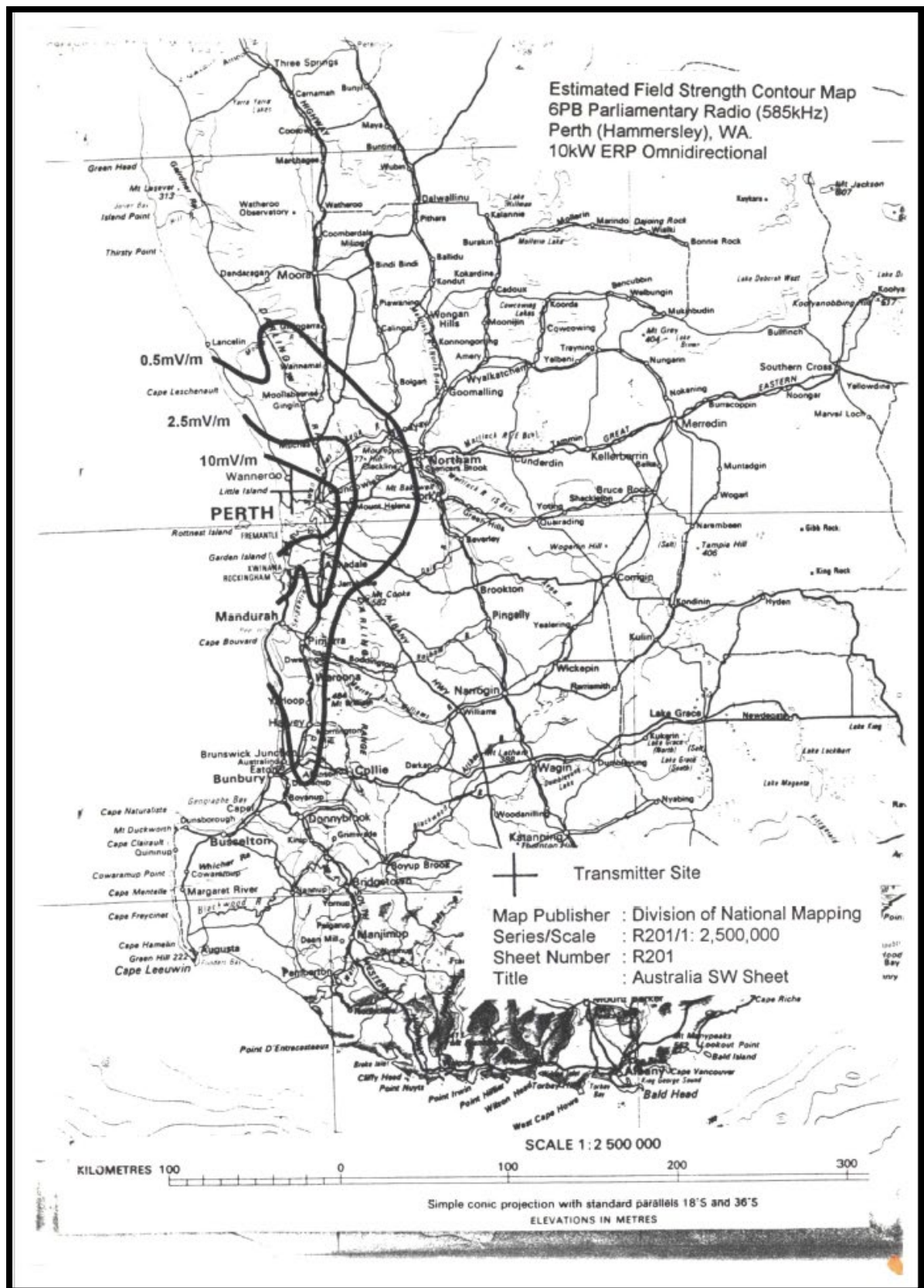


Figure 1 – Division of National Mapping (Cth) estimated coverage of 6PB (585 kHz)

The ABC has confirmed the field contours of 585 kHz at its current operating parameters through in-field testing conducted over 2020-2025. The coverage contour estimates for

585 kHz have been translated into Google Earth to facilitate comparisons with other mapping data.

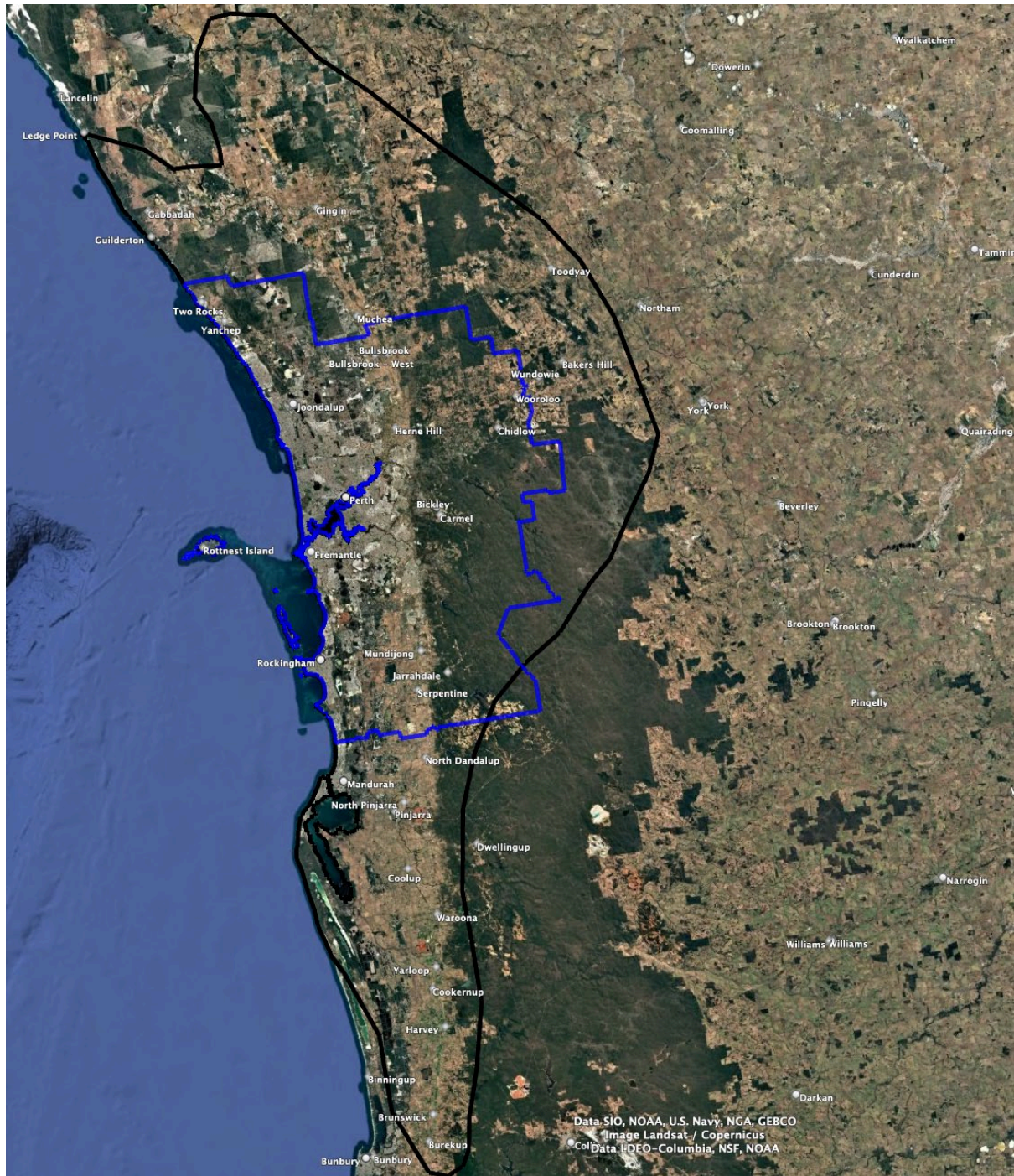


Figure 2 – ABC NEWS radio Perth (585 kHz) contour (black), with Perth RA1 area (blue)

The ABC notes that the coverage modelling available for the ABC NEWS radio 585 kHz service does extend south to areas around Mandurah and Harvey as indicated by the ACMA in the Perth LAP discussion paper, and also reaches south as far as Brunswick and Burrekup, but not as far south as the Radio National 810 kHz service (to Bunbury and Yallingup). The number of people outside Perth who could tune to ABC NEWS radio via 585 kHz is therefore smaller than for Radio National via 810 kHz.

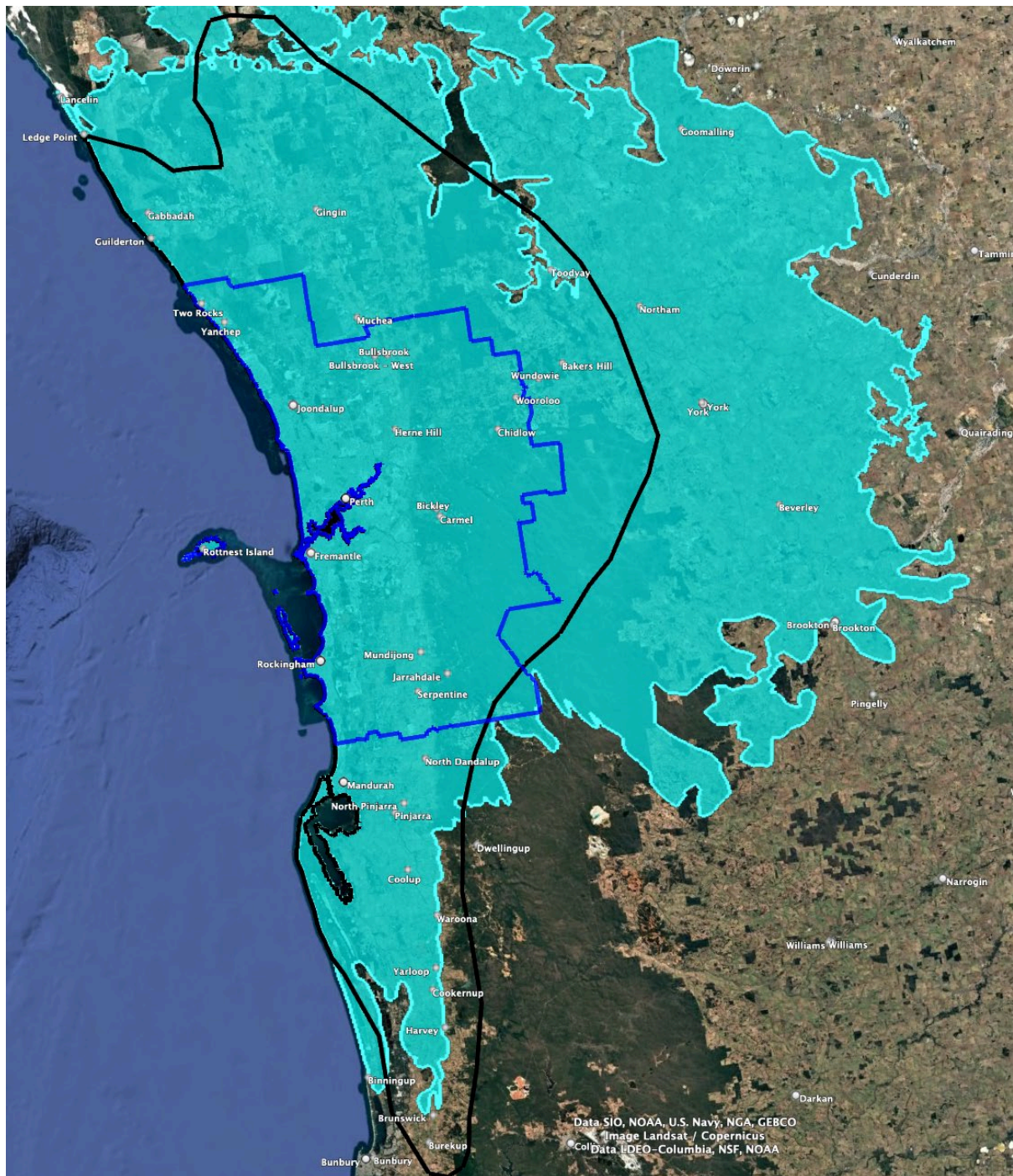


Figure 3 – ABC NEWS radio Perth (585 kHz) contour (black), with Perth RA1 area (blue) and with new ABC NEWS radio Perth FM (104.1 MHz) contour (light blue)

Corporation modelling suggests that approximately 11,000 people could reside outside of the new ABC NEWS radio 104.1 MHz coverage footprint but otherwise inside the ABC NEWS radio 585 kHz coverage footprint.

The majority of the people predicted to lie outside of the new FM service footprint will remain to be served by Perth 585 kHz and are otherwise covered by alternative ABC NEWS radio services, primarily from Busselton on 1152 kHz. The number of people in areas outside of the 104.1 MHz footprint in the southern area is approximately 9,150. Recent audience survey results suggest the number of listeners in this situation is approximately 500.

The remaining people affected are primarily in the township of Toodyay, where geographical features block FM coverage from Perth.

Listeners seeking an upgraded audio experience such as provided by the new ABC NEWS radio Perth 104.1 MHz service in affected areas will be able to switch to ABC NEWS radio content via alternative technologies, such as via the ABC Listen App where mobile reception is available (Toodyay township has good 4G mobile reception), or via ABC radio on TV if in the home (channel 204).

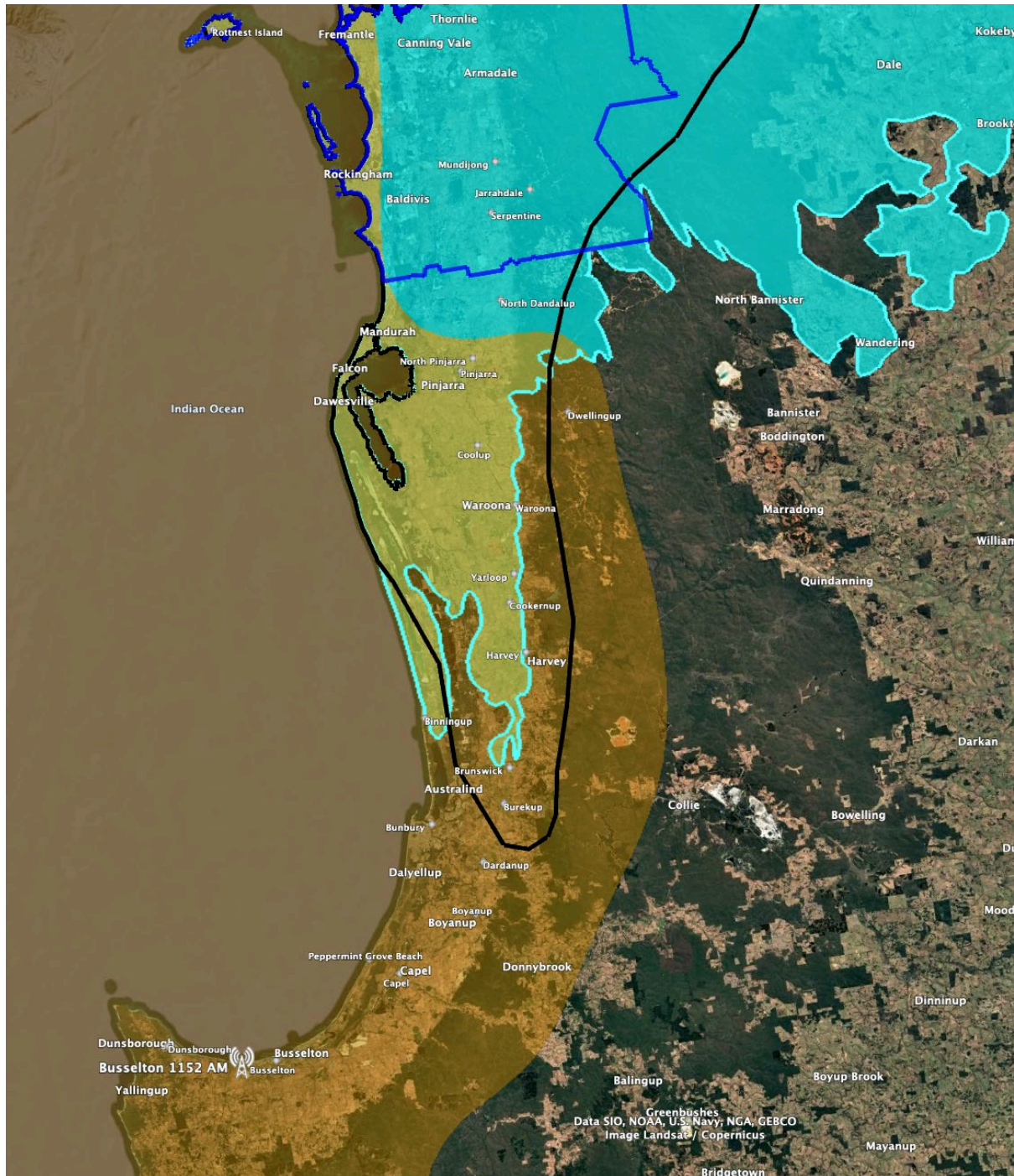


Figure 4 – ABC NEWS radio Perth (585 kHz) contour (black), with Perth RA1 area (blue), with new ABC NEWS radio Perth FM (104.1 MHz) contour (light blue) and with ABC NEWS radio Busselton (1152 kHz) coverage (orange)

The ABC has confirmed the relative coverage strengths and receivability of the services in this area through in-field measurements using its Field Test Vehicle.

3.1.3. Potential interference with the Spice FM HPON service

The Corporation notes that the ACMA has identified there may be limited impact experienced on 20–30-year-old radio receivers by the operation by the ABC of 104.1 MHz at 100 kW. The Corporation also notes ACMA advice that this issue is unlikely to manifest in newer radio receivers where digital filter blockers are installed.

The ABC understands that Spice FM is licensed to operate from a site at Reservoir McDonald Street, Joondanna, and that its area of operation is defined as a 7 km radius from this site location.

The ABC is proposing to monitor the Perth market generally and provide appropriate mitigations to Spice FM audiences in its service area where required. The Corporation has already conducted in-field measurements of the Spice FM service area, currently operating on 104.9 MHz, and will conduct further field measurements once the ABC's 104.1 MHz service commences operation.

The Corporation also operates a dedicated audience contact line (the Reception Advice Line) and will ensure that the Perth audience is aware of the existence of this contact point, which will collate and respond to audience feedback on this issue.

If the ACMA approves the operation of the 104.1 MHz service for ABC NEWS radio operation in Perth, the Corporation will also liaise closely with Spice FM to advise of the timeframes for commencement of transmissions and will also provide appropriate information to the Spice FM audience if an issue is experienced.

3.2. Add new technical specification for the 6SAT commercial radio broadcasting service in Lancelin to facilitate the availability of an FM frequency for the ABC 6PB service.

The Corporation has been working closely with 6SAT Lancelin to facilitate the changes to the frequency of its service that would be required to enable ABC NEWS radio AM / FM conversion to occur.

The ABC supports the technical specifications of the 6SAT Lancelin service at Council Site Nilgen Rd, NILGEN, using 104.5 MHz at an ERP of 150 W and antenna height of 40 m in accordance with the proposed technical specifications in the Remote WA LAP.

3.3. Vary the existing 6SAT technical specification in Lancelin so that it will cease to have effect 8 weeks after commencement of the new Lancelin 6SAT technical specification.

The Corporation notes ACMA has proposed up to eight weeks for 6SAT Lancelin to complete its transition from 103.9 MHz to 104.5 MHz.

The ABC has made arrangements with 6SAT Lancelin to facilitate a simulcast period at the technical specifications proposed in the draft Remote WA LAP. The service can commence its simulcast as soon as licensing arrangements are made.

Given the Corporation cannot commence its own transmissions until after the 6SAT simulcast has concluded, the ABC requests issue of the licences in a timely manner.

3.4. Vary the technical specification for 6SAT in Leeman, to facilitate the availability of an FM frequency for the ABC 6PB service.

The Corporation has been working closely with 6FMS Leeman to facilitate the changes to the maximum ERP and site location of its service that would be required to enable ABC Radio Perth AM / FM conversion to occur.

The ABC supports locating 6SAT Leeman at Broadcast Site, Indian Ocean Drive, Leeman at an ERP of 100 W and antenna height of 15 m.

Proposal 4. New Swan community radio broadcasting service

4.1. Make spectrum available for a new community radio broadcasting service to serve the Swan area.

The Corporation has no submission in relation to the reservation of spectrum for an additional community broadcasting service for the Swan area.

4.2. Create a new licence area Swan RA1 and designate it as the licence area of the new proposed community radio broadcasting service to serve Swan.

Given the ABC makes no submission about the appropriateness of a new community broadcasting service for the Swan region, it also has no submission to make about the area designated for this purpose.

Proposal 5. Variations to various technical specifications

5.1. Vary the technical specifications of the SL1851, 6NME, 6RTR, 6SON, and 6NR community radio broadcasting services that are planned in the Perth RA1 licence area to reflect operating conditions.

The ABC does not object to the technical specification changes proposed by the ACMA in the Perth LAP consultation draft as they relate to SL1851, 6NME, 6RTR, 6SON or 6NR.

Proposal 6. Other minor amendments

6.1. Make other minor amendments, including:

- 6.1.1. varying the technical specifications of 6ABCFM, 6JJJ and 6SBSFM existing FM national services to enable them to use the same antenna as the proposed 6WF, 6RN and 6PB ABC FM services, and to reflect operating conditions

The Corporation notes that the current national broadcaster FM services operating from the Bickley Site will not be able to operate with the technical specifications listed in the current Perth LAP if the three new ABC FM services are planned.

This is because an antenna upgrade is required at the Bickley site to accommodate the three new services, and this in turn requires complete replacement of the previous FM antenna onsite.

The ABC is therefore supportive of the changes proposed to the technical specifications for 6ABCFM (ABC Classic), 6JJJ (triple j) and 6SBSFM to increase the antenna height from 97 m to 105 m.

- 6.1.2. varying the technical specifications of the 6iX Wanneroo commercial radio broadcasting transmitter to address potential interference issues and reflect operating conditions

The ABC does not object to the 6iX Wanneroo transmitter changes proposed by the ACMA in the Perth LAP consultation draft.

- 6.1.3. updating the Perth LAP and Remote WA LAP to make them consistent with other licence area plans.

The Corporation notes the ACMA proposal to update various matters in the Perth LAP and the Remote WA LAP, including:

- updating the Australian Map Grid references to Geocentric Datum of Australia (GDA94)
- removing reference to the Broadcasting Services (Technical Planning) Guidelines 2017 from the attachments, placing instead a substantive provision referring to these Guidelines in the LAPs themselves and
- other consequential Schedule and grammatical amendments.

The ABC is supportive of these updates and amendments.

Appendix 1: Populations Affected

Proposal 1. 6WF (ABC Radio Perth) to transmit on 102.5 MHz

Coverage Areas of Interest	Draft LAP assessment of affected population	ABC assessment of affected population	ABC assessment of likely audience affected	Audiences Experience ABC comment
Perth metropolitan area	All population can receive the FM signal	All population can receive the FM signal	All can receive the FM signal	The ABC is committed to continuing to provide appropriate and engaging local radio content to the Perth audience and welcomes the opportunity to do this using 102.5FM.
South of Perth metropolitan area (Bunbury and Busselton region)	Between 180,000 and 195,000	Approx. 149,000	2,000 people aged 10+ who exclusively listen to ABC Radio Perth via 720AM	All audiences in this region can tune to a regionally appropriate ABC Radio service; ABC South West WA on Bunbury 684AM.
East of Perth metropolitan area (Northam and towards Dalwallinu)		Approx. 22,900	400 people aged 10+ who exclusively listen to ABC Radio Perth via 720AM	All audiences can tune to a regionally appropriate ABC Radio services; ABC Midwest & Wheatbelt on Northam 1215AM & Dalwallinu 531AM

Proposal 2. 6RN (ABC Radio National) to transmit on 103.3 MHz

Coverage Areas of Interest	Draft LAP assessment of affected population	ABC assessment of affected population	ABC assessment of likely audience affected	Audiences Experience ABC comment
Perth metropolitan area	All population can receive the FM signal	All population can receive the FM signal	All can receive the FM signal	The ABC is committed to continuing to provide Radio National content, bringing Australia's biggest conversations to the Perth audience and welcomes the opportunity to do this using 103.3FM
South and East of Perth metropolitan area	Between 14,000 and 26,000	Approx. 12,000	375 people aged 10+ listen to ABC Radio National Perth via 810AM	All audiences in these regions can tune to a regionally appropriate ABC Radio National service; Bunbury on 1269AM and Dalwallinu on 612AM

Proposal 3. 6PB (ABC NEWS radio Perth) to transmit on 104.1 MHz

The majority of the people predicted to lie outside of the new FM service footprint will remain to be served by Perth 585 kHz and are otherwise covered by alternative ABC NEWS radio services, primarily from Busselton on 1152 kHz