



**Submission re**

**ACMA Proposal to Vary  
the Perth and Remote Western Australia  
Radio Licence Area Plans**

**August 2025**

ANRA welcomes the opportunity to respond to the recent consultation paper “ACMA Proposal to vary the Perth and Remote Western Australia radio licence area plans”.

While our comments are put forward as a general overview from ANRA's diverse membership, we note that individual members may elect to make their own submissions which may emphasize or nuance certain matters slightly differently.

ANRA, the Australian Narrowcast Radio Association, is the peak industry body representing Low Power Open Narrowcast (LPON) Radio services and the High Power Open Narrowcast (HPON) Radio services located across all States and Territories of Australia. Our membership includes the major Narrowcast radio program providers such as fringe music services, foreign language groups, racing radio, tourist services, indigenous and religious services, as well as many other diverse, independently owned and operated services.

As always ANRA appreciates the opportunity to make this submission and is aware that ACMA has a good understanding of the ongoing development of the Narrowcast Sector when making decisions that may impact its future growth.

**From:** Australian Narrowcast Radio Association (ANRA)

**Date:** 30 September 2025

## **RESPONSE FROM ANRA - CONCERNS**

### **Disadvantaging**

ANRA is concerned that there is a risk that only a few stations would remain in the AM Band in the Perth licence area if the variation is applied as proposed.

There is also the concern that, if a small number of broadcasters are excluded from the planned FM conversion, it will deter listeners from tuning into those stations, devaluing the licences of those broadcasters and reducing diversity in the market.

We believe that two of our Member stations in particular...SENTrack/TAB Radio and Racing & Wagering WA...would be put at significant commercial disadvantage if there is no plan or pathway to also convert these services to FM.

### **Reducing Diversity**

The ACMA planning guidelines require the promotion of a diverse range of services. In particular, it notes that the object of promoting a diverse range of radio services and entertainment should be considered and notes the importance of ensuring Australian's are not underserved due to inadequate reception.

ANRA's narrowcast members, including SENTrack/TAB Radio and Racing & Wagering WA, provide an important contribution to that diversity of radio services.

### **Impact on HPON Services**

We are also concerned that:

- a. Spice FM (HPON on **104.9 MHz**) could face adjacent-channel interference risk from ABC NewsRadio's new **104.1 MHz** high-power service.
- b. As proposed, Perth City HPON on **103.3 MHz** would be required to vacate its frequency for ABC Radio National's FM conversion and ACMA proposes that it be re-allocated to **106.5 MHz**. Such a change would require transmission retuning, marketing and listener re-education.

### **Impact on LPON Services**

There is a concern that any increase in noise or interference due to FM congestion in Perth would adversely affect LPON services.

### **Importance of conversion of services to FM**

In the ACMA's own report "The future delivery of radio" it noted that AM technology has a number of shortcomings including high susceptibility to interference from electrical noise and high power. The report also noted the particular issues with AM in the Perth licence

area which hinder AM transmission, stating that *“Perth’s unique geographic circumstances.... result in poor AM propagation”*.

While narrowcast licences are subject to different terms to those of commercial licences, interference-free broadcasting is equally critical to the service, to maintaining listenership and to promoting diversity in the market in accordance with the objects of the BSA.

The ACMA’s planning should recognise this and give full consideration to options that would better promote these BSA objectives by accommodating all licensees impacted by the geographic issues faced in Perth.

### **Ensuring efficient use of spectrum**

The ACMA’s policy guidelines found that *“the potential for finding sufficient frequencies for each AM station is low”* based on ACMA’s work to date. Some of our members’ preliminary engineering investigations suggest that the available FM spectrum, as identified by the ACMA, can be much more efficiently deployed so as to ensure that all broadcasters (including SEN/TAB Radio and Racing and Wagering WA) can be accommodated in a conversion exercise.

### **Summary**

ANRA is concerned that some of our members have been excluded from the proposed plan for conversion of AM services in the Perth licence area, and that the plan does not present the most efficient use of the FM spectrum available.

There is a significant risk that, if implemented, and only a few broadcasters are excluded from the proposed plan for conversion to FM, this will have the effect of:

- deterring listeners from tuning into those stations on the AM Band;
- devaluing the licences of those broadcasters; and
- reducing diversity in the market.

ANRA strongly recommends exploring other options that are more responsive to audience needs in the licence area, and that both SENTrack/TAB Radio and Racing & Wagering WA be included in the ACMA’s considerations moving forward.

ANRA feels that the issue of spectrum allocation in the Perth area requires further exploration as to how the available FM spectrum can be utilised to maintain the diversity of all radio services in the Perth market.

ANRA welcomes the opportunity to be involved in future discussions .