

Proposal to vary the Perth & Remote Western Australia radio licence area plans

Comments on the ACMA Consultation paper

September 2025

1. Introduction

- 1.1 The Community Broadcasting Association of Australia (CBAA) welcomes the opportunity to respond to the ACMA consultation paper entitled, 'Proposal to vary the Perth and Remote Western Australia radio licence area plans', August 2025.
- 1.2 The CBAA is the peak body for community broadcasting licensees in Australia.
- 1.3 The consultation to vary the Perth radio licence area plan (LAP) follows a discussion and options paper circulated by the ACMA in April 2021, detailed comments made by the CBAA in response, and an outcome statement published by the ACMA in September 2022.¹
- 1.4 The ACMA outcome statement noted there are 5 FM frequencies available in Perth for conversion and proposed a two-stage approach with stage one being focussed on conversion of 3 ABC radio services from AM to FM, and stage two focussed on the 2 remaining AM commercial radio services converting to FM, if the concerns of the (incumbent) commercial FM services have been resolved.
- 1.5 The ACMA outcome statement noted the ABC would be responsible for mitigating the potential impact on other radio services affected by the conversion of its AM services.
- 1.6 The ACMA outcome statement noted that the CBAA had raised concerns about the impact on (two) community broadcasters affected by the ABC conversions and stated that the ACMA would not progress the ABC conversion requests until these matters are resolved to the satisfaction of the affected licensees.
- 1.7 CBAA has actively engaged with the community broadcasters directly affected by proposed changes, with a view to constructive outcomes for those stations and the broader public interest issues.
- 1.8 These matters are well progressed, and both affected licensees - 6SEN and 6KCR - have indicated their support of the proposed changes to the Perth radio licence area plan, subject to finalisation of negotiations regarding revised transmission infrastructure and transitional arrangements.
- 1.9 The finalisation of these matters is expected by or before 31 December 2025, at which point both licensees will update the ACMA. It is expected this may align with timelines for consideration of comments and finalisation of the changes to the Perth radio LAP.

2. Scope of consultation and comments

- 2.1 The ACMA consultation paper proposes changes to allow for three ABC AM radio services to convert to FM.
- 2.2 The ACMA consultation paper also takes the opportunity to propose a new community radio broadcasting service in the Swan area, and to deal with some tidy-ups, and other minor variations.

AM to FM conversions and consequential impacts

- 2.3 The proposals to make VHF FM spectrum available to enable the ABC to convert 3 of its radio services in Perth from AM to FM will result in no ABC radio services being then available to listeners in Perth on AM.
- 2.4 In this consultation the ACMA has not addressed the situation of other AM services operating in Perth, including two commercial radio services, 6PR (Nine Radio) and 6IX (Radio Perth, Capital/Grant JV) and the one community radio service operating on AM, 6RPH, the radio reading service licensed to Vision Australia.
- 2.5 The consultation paper briefly outlines reasons for addressing the conversion of radio services from legacy analogue AM technology to legacy analogue FM technology, and for dealing with the ABC services as a first stage. These matters have been canvassed in the previous option paper, submissions, and the 2022 ACMA outcome statement.
- 2.6 Some related and relevant facts worth noting include:
 - The ABC AM radio services converting to FM are already available across all of Perth RA1 on a free-to-air basis using DAB+ digital radio, alongside further ABC and SBS digital radio services that are not available on AM or FM.

¹ Outcome statement and submissions related to ACMA 2021 options paper
<https://www.acma.gov.au/consultations/2021-04/fm-broadcasting-services-band-perth-ra1-licence-area-consultation-172021>

- The ABC AM radio services converting to FM are already available via the ABC Listen online application, although that does not constitute free-to-air radio broadcasting.
- All the metropolitan commercial radio services operating on either AM or FM are already available across all of Perth RA1 on a free-to-air basis using DAB+ digital radio.
- All the metropolitan community radio services operating on either AM or FM are already available across all of Perth RA1 on a free-to-air basis using DAB+ digital radio.

2.7 Two community radio broadcasters, 6KCR and 6SEN, are specifically and significantly affected by the proposal to convert ABC AM services to FM. The ACMA proposal is that:

- 6KCR change from its current operating frequency of 102.5 MHz, to a revised frequency of 88.9 MHz. 6KCR has been licensed to operate on 102.5 MHz since inception and for over 20 years.
- 6SEN relocate from its current transmit site location at Wireless Hill, Ardross, to the Tower Broadcast Australia transmit site, Bickley. 6SEN has operated from its current transmit site at Ardross since inception and for over 20 years.

Omission of radio reading service, 6RPH

- 2.8 The CBAA and Vision Australia, the licensee of the Perth radio reading service 6RPH, expressed serious concern at 6RPH being omitted from listing as an existing AM service in the options paper regarding Perth radio planning circulated by the ACMA in April 2021.
- 2.9 The outcomes statement from that paper, published by the ACMA in September 2022, subsequently acknowledged 6RPH as providing a valuable service for the local blind, low-vision and print-disabled communities, and declared that as the number of available FM channels in Perth was constrained to 5, that 6RPH would be left on AM.
- 2.10 Being left on AM incurs significant costs for 6RPH. Moreover, being left on AM once the ABC radio audience is no longer on AM also isolates and presents challenges for 6RPH.
- 2.11 The services of 6RPH are already available in Perth on DAB+ digital radio. At this stage, the CBAA and the licensee of 6RPH, Vision Australia, both agree that the converting to FM transmission, and the extra cost of FM transmission would serve no purpose.

New licence area, and new community radio broadcasting allocation, Swan

- 2.12 The ACMA proposes to create a new licence area, within Perth RA1, in the outer north-east of the city of Perth, to be called Swan RA1, and allocate a permanent community radio broadcasting licence, using 88.5 MHz at 200 W maximum ERP, all directions.
- 2.13 The ACMA reasonably expects this will be an effective outcome, given a temporary community broadcasting licensee has been in operation on an ongoing basis.

Vary technical specifications of community radio services to reflect operating conditions

- 2.14 The ACMA proposes to regularise and align the technical specifications of SL185², 6NME, 6RTR, 6SON, and 6NR community radio broadcasting services, that are planned to serve the entire Perth RA1 licence area, to reflect current operating conditions.
- 2.15 The current operating conditions operate at 16 kW maximum ERP, with an arc of reduced coverage to the East and South-South-West, 40°T-200°T – specifically, to have horizontal radiation pattern (HRP) limits to the maximum ERP as follows:
- | | |
|----------------|-------|
| 0°T to 40°T | 16 kW |
| 40°T to 70°T | 8 kW |
| 70°T to 170°T | 4 kW |
| 170°T to 200°T | 8 kW |
| 200°T to 360°T | 16 kW |
- 2.16 The relevant licensees and the CBAA agree and support this regularisation.

² SL185 is currently allocated to 6EBA, and the technical specifications are to be kept consistent with allocations for community radio broadcasting purposes in Perth RA1.

3. Consequential impacts to 6KCR

- 3.1 The proposed allocation of 102.5 MHz on a 100 kW ERP high-power basis for ABC radio purposes has consequential impacts for the community radio service 6KCR.
- 3.2 6KCR is currently licensed to use 102.5 MHz, which the station advises it has used since first being granted a permanent licence in 2002.
- 3.3 6KCR operates on 102.5 MHz with limited coverage to provide a radio service focussed on a local area of the Perth Hills and Foothills which sits within, but does not extend across the entire Perth RA1 radio licence area.
- 3.4 In order to facilitate the ABC conversion, the ACMA proposes that 6KCR change from its current operating frequency of 102.5 MHz to a revised frequency of 88.9 MHz.
- 3.5 Alongside this proposed change, 6KCR has been dealing with disruption to its current transmission facility. The ACMA has recently processed the station's request for an alternate transmission site on a temporary basis.
- 3.6 As a long-term arrangement, 6KCR has negotiated access to a new transmission site, which is in accord with the technical specification proposed by the ACMA in the Perth radio licence area plan variation.
- 3.7 The station has organised its own resources and some funding to support the changes required to its transmission arrangements. The station appreciates the support it has obtained from the ABC and its contractors to date, and the CBF, and looks forward to bringing the finalised arrangements about in the near future.
- 3.8 The ACMA has proposed a 8 week simulcast period, during which 6KCR operates on the existing frequency of 102.5 MHz, and, from its revised long-term transmission site also broadcasts using the revised frequency of 88.9 MHz. The station supports the simulcast period of 8 weeks as a necessary part of its transition strategy.
- 3.9 The licensee of 6KCR has advised that while it would prefer to remain broadcasting on 102.5 MHz and will experience some difficulty with the transition of listeners, it does appreciate the need for a revised frequency to facilitate FM planning and for the ABC radio services to move away from use of AM.
- 3.10 Given that background context, 6KCR has indicated its support of the proposed changes to the Perth radio licence area plan, subject to finalisation of negotiations regarding revised transmission infrastructure and transitional arrangements.
- 3.11 The finalisation of these matters sufficient to then consider appropriate timing of the simulcast period is expected by or before 31 December 2025, at which point 6KCR will update the ACMA. It is expected 6KCR readiness and timing may align with timelines for consideration of comments and finalisation of the changes to the Perth radio LAP.

4. Consequential impacts to 6SEN

- 4.1 The proposed allocation of 102.5 MHz on a 100 kW ERP high-power basis for ABC radio purposes has consequential impacts for the community radio service 6SEN.
- 4.2 6SEN currently broadcasts using a frequency of 101.7 MHz from its transmit site which is co-located near its studio facility at Wireless Hill, Ardross. 6SEN has operated from its current transmit site for over 20 years, commencing in May 2003.
- 4.3 In order to facilitate the ABC conversion, the ACMA proposes 6SEN relocate from its current transmit site to instead use the Tower Broadcast Australia transmit site, Bickley, and to change from its current omni-directional horizontal radiation pattern to a directional horizontal radiation pattern.
- 4.4 The licensee of 6SEN has entered into discussions with the ABC and negotiations with BAI, the facility operator of the proposed relocated transmission site.
- 4.5 The licensee of 6SEN has indicated its support of the proposed changes to the Perth radio licence area plan, subject to finalisation of negotiations regarding revised transmission infrastructure and transitional arrangements.
- 4.6 The finalisation of these matters is expected by or before 31 December 2025, at which point 6SEN will update the ACMA. It is expected this may align with timelines for consideration of comments and finalisation of the changes to the Perth radio LAP.

- 4.7 The licensee of 6SEN is concerned that the technical specification proposed by the ACMA is fit for purpose and not be inferior to other community radio broadcasting services licensed to provide coverage of the entire Perth RA1 radio licence area.
- 4.8 The proposed technical specifications of the community radio broadcasting services SL185/6EBA, 6SON, 6NME, 6RTR and 6NR have horizontal radiation pattern (HRP) limits to the maximum ERP as follows:
- | | |
|----------------|-------|
| 0°T to 40°T | 16 kW |
| 40°T to 70°T | 8 kW |
| 70°T to 170°T | 4 kW |
| 170°T to 200°T | 8 kW |
| 200°T to 360°T | 16 kW |
- 4.9 The effect is to reduce coverage across an arc 40-200 degrees centred roughly ESE (120 degrees) relative to the main transmitter site at Bickley.
- 4.10 Noting that the commercial radio broadcasters operate with 40 kW ERP, presumably 16 kW ERP is assessed by ACMA as adequate to provide coverage to the populated areas of the Perth RA1 Licence Area. Taking into account this specification represents an alignment of the technical specification with current operating conditions, this assessment would seem adequate.
- 4.11 The ACMA proposal for 6SEN is to relocate to the BAI Tower site at Bickley with an antenna height of 120 metres as the main transmit site, with limits on the horizontal radiation pattern (HRP) to the maximum ERP as follows:
- | | |
|----------------|-----------|
| 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 |
- 4.12 The deepest reduction in coverage is across an arc 70-180 degrees centred roughly ESE (125 degrees), with a lesser reduction centred SSW (195 degrees), relative to the main transmitter site at Bickley. Again, 16 kW ERP is assessed by ACMA as adequate to provide coverage to the populated areas of the Perth RA1 Licence Area.
- 4.13 The technical specification for the commercial service 6PER (Nova) which currently operates from the BAI Tower site at Bickley with an antenna height of 120 metres has the same pattern of limits in the HRP ERP as follows:
- | | |
|----------------|-------|
| 0°T to 70°T | 40 kW |
| 70°T to 180°T | 1 kW |
| 180°T to 210°T | 5 kW |
| 210°T to 360°T | 40 kW |
- 4.14 The specification of the other commercial radio services (6MMM, 6MIX and 6NOW) are the same, albeit from a slightly different main transmitter site, the TXA Bickley site.
- 4.15 While the proposed relative pattern of the HRP limits to the ERP are kept similar, the effect is that the absolute limits for the 6SEN ERP in the arc of reduced coverage are significantly deeper than those that are in place for the other community services licensed to operate across Perth RA1 radio licence area.
- 4.16 For comparison, they are:
- 400 watts for 6SEN in the deepest part of the reduction, compared to 4 kW for the other community radio services. A 10 dB reduction to 400 watts is significant.
 - 2 kW in the lesser part of the reduction, compared to 8 kW for the other community radio services.
- 4.17 The licensee of 6SEN is concerned to assess the impact of this difference, and requests that the ACMA provide more information to help them make that assessment.
- 4.18 The licensee of 6SEN suggests an adjustment to the specification to allow the option for a second/alternate site, in other words, to include the option to be the same as the other community radio services technical specification.
- 4.19 As an alternative proposal, the licensee of 6SEN suggests the specification with the lesser reduction – as is proposed and is used by the other community radio services – might be also used for 6SEN, with an explicit condition added that allows for operation with a deeper reduction to the HRP or at either site. It may well be that is already acceptable under the TPGs and so a condition and specification to allow for a HRP with the deeper reduction in HRP and coverage is not necessary. That would give flexibility.

- 4.20 The information from the ACMA that the licensee of 6SEN requests includes:
1. Identify the population count in fixed location residences within the Perth RA1 affected in the arc where coverage limits have been applied, 70-210 degrees.
 2. Estimate the average number of commuters, tourists, transport or other users of radio services in vehicles that are typical in the affected arc.
 3. Estimate the population count affected by the reduction in the 70-180 degree arc from 4 kW to 400 Watts.
 4. Estimate the population count affected by the reduction in the 180-210 degree arc from 8 kW to 2 kW.
- 4.21 Related information has been requested from the relevant transmission facility provider, BAI, as follows:
1. Identify the coverage and mapping of the service operating at the BAI Tower site at Bickley when using the commercial radio technical specification, of 40 kW maximum ERP, with reduced coverage arcs of 1 kW and 5 kW.
 2. Identify the coverage and mapping of the service operating at the BAI Tower site at Bickley when using the proposed radio technical specification for 6SEN, of 16 kW maximum ERP, with reduced coverage arcs of 400W and 2 kW.
 3. Estimate the population count affected by the reduction in the 70-180 degree arc from 1 kW to 400 watts.
 4. Estimate the population count affected by the reduction in the 180-210 degree arc from 5 kW to 2 kW
- 4.22 A simplified map and diagram below shows the Perth RA1 radio licence area, and areas of coverage reduction as currently proposed for 6SEN by the ACMA.
- 4.23 A maximum ERP of 16 kW is proposed for all Perth RA1 community radio broadcasters operating on FM, whereas the proposed amount of coverage reduction for 6SEN is different, as shown.

