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

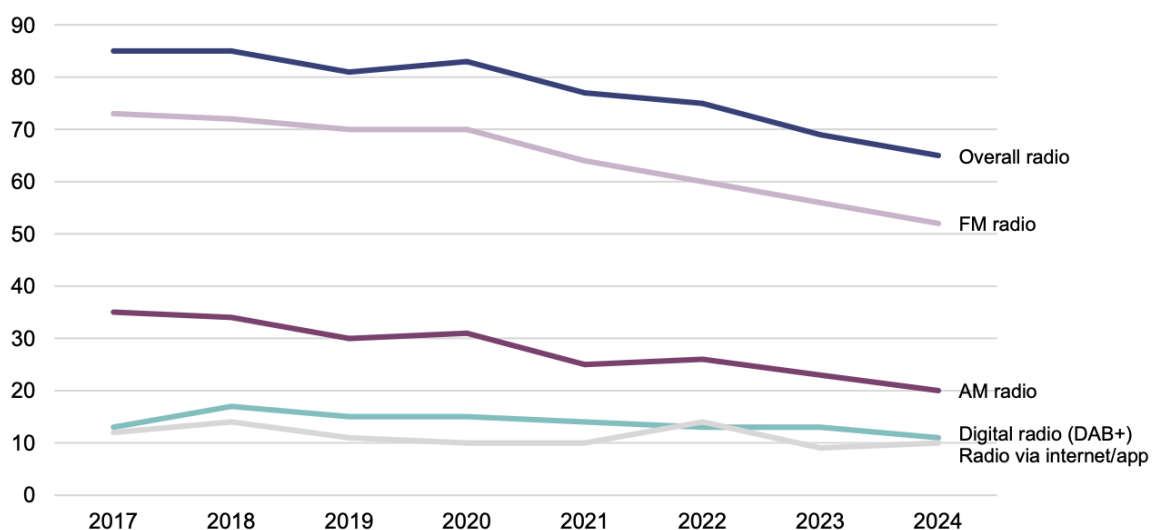
Thank you for inviting comment on the above proposal. I am a media consultant and commentator, and have worked within radio for over 35 years. I have particular specialisation on the subject of radio platforms for consumption, having launched the world's first mobile phone streaming app for a radio station in 2005, and have worked for broadcasters in the UK, Canada and other countries, most notably Virgin Radio, which was a UK national AM broadcaster. I live in Brisbane, Queensland, am an Australian citizen, and am not employed by any Australian media company.

I would like to comment on Proposal 1 (ABC Radio Perth, 6WF); Proposal 2 (ABC Radio National, 6RN); and Proposal 3 (ABC News Radio, 6PB).

## AM is a challenging waveband in cities

Across Australia, ACMA's own research shows that AM radio is only listened-to by 20% of Australians. This figure has significantly declined since 2017, when 35% of Australians listened.

Figure 7: Radio listenership in the previous 7 days to June 2017 to June 2024 (%)



Base: Australian s aged 18 and over, 2017 (n=2,277), 2018 (n=2,106), 2019 (n=2,067), 2020 (n=2,009), 2021 (n=3,584), 2022 (n=3,580), 2023 (n=3,572), 2024 (n=3,530).

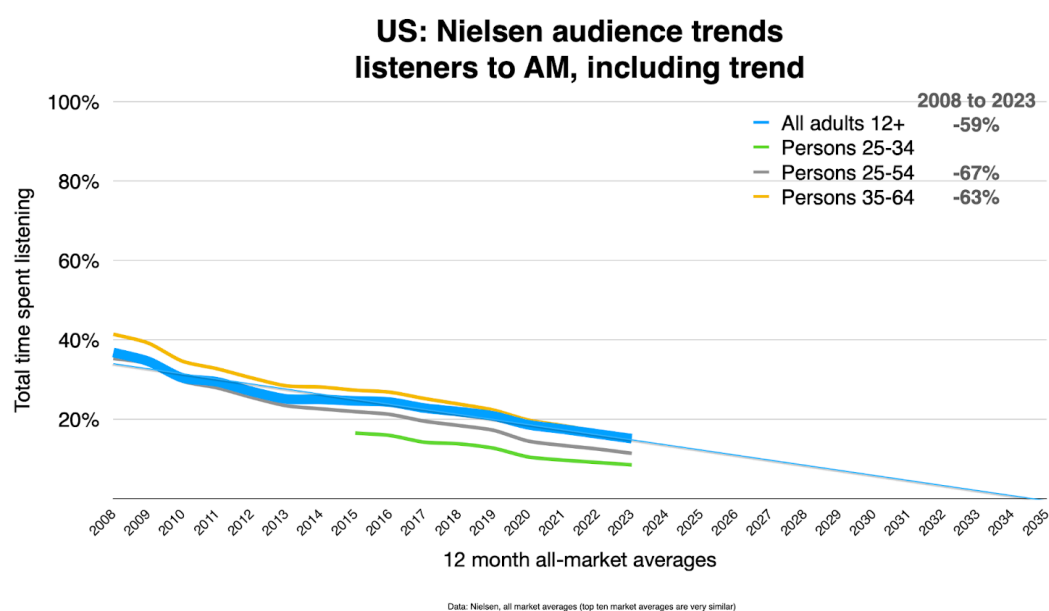
Source: ACMA, *Communications and media in Australia: How we watch and listen to content*, December 2024.

AM reception in built-up areas is challenging. There are significant, and growing, effects of electrical interference from high power lines (like those in use for tram and train tracks, as well as electricity distribution); and from LED lights (in use in most domestic and commercial situations). Additionally, the growing use of concrete, metallic-coating for windows, and foil insulation, makes indoor AM reception difficult, if not impossible, for many listeners.

As Australia moves to electric cars, the lack of availability of AM radio within these electric cars is also a hindrance to the platform. One of Australia's best-selling, and cheapest, electric cars, the MG MG4 EV, does not have an AM receiver inside; nor does any Tesla model.

In Europe, AM is being turned off. Large broadcasters in France and Germany have ceased AM transmission. The UK has seen national networks turned off (like 1215kHz, Absolute Radio, and many translators for 1053/1089kHz, talkSPORT), and many local stations have removed their AM broadcasts. Australia does not operate in a vacuum when it comes to car specifications and availability of receivers; as AM continues to be switched-off across the world, AM faces an uncertain future.

In the US, long-held to be the home of AM radio, time spent listening to AM has significantly declined in recent years, more than halving in 15 years. Most AM stations have now achieved a switch to FM, and my own trend analysis on Nielsen data shows that AM has less than ten years left in the country.



Additionally, ownership of AM radio receivers is low: and the RF stages required for good AM reception are often bulky and prone to interference from processor-based receivers. A cursory look in local electrical stores show that AM radios, where they are available, are not coupled with wifi or DAB reception, and are almost entirely the bottom of the range.

It should be noted that AM still has benefits in terms of coverage over long distances. The broadcast market outside built-up areas and cities is very different.

## Effective emergency broadcasting

The ABC is funded from general taxation. All Australian taxpayers pay for the service.

One of the reasons the ABC is funded is as an emergency broadcaster. Its emergency broadcasts are well-regarded by broadcasters globally, and impressive in their scope and format. The emergency broadcasting that is available from the ABC is broadcast on their flagship service, the local radio station: in this case, ABC Radio Perth. It is here that government agencies, utilities and others will point Australians to in times of emergency.

Yet, because the ABC's current output of its flagship services like ABC Radio Perth is restricted to AM, many Australians do not have access to it - either because they do not own an AM analogue radio, or that AM reception in their household is unsuitable.

An emergency broadcaster is only effective if it is able to reach an audience. Increasingly, AM radio - with a lack of receivers and worsening reception conditions in cities - is not capable of reaching a wide audience. This issue is particularly acute when we consider emergency broadcasting. A listener that does not ordinarily listen to ABC Radio Perth, but wishes to switch to it in times of emergency, may well discover that they do not own an AM radio capable of receiving the station; or may discover that the reception in their home is non-existent. It is badly serving Australians if they are not able to receive their emergency broadcaster.

The ABC recognised this in Cyclone Alfred earlier this year, when ABC Radio Brisbane was also simulcast on 106.1FM in the city, taking the place of ABC Classic, during the emergency event.

## Value for money from ABC services

Since the ABC is funded by general taxation, there is also a clear value-for-money test to be applied: how many people consume the ABC on radio, and is that good value for the money - reported to be 12 cents a day - that Australians pay for the ABC?

It is clear that the apparent value for money from the ABC is increased if the ABC's radio services are available to more listeners: and, additionally, clear that availability of the ABC's three speech services on FM would significantly increase the audience.

The ABC's audience figures have been dropping considerably over the last decade. It's my view that at least part of the reason for this is because the ABC has been disadvantaged by being on the AM waveband: that listeners find it hard to listen, and that trial is hindered by the ABC being on a different waveband to FM, where the majority of radio listening occurs.

For the ABC's services to be available on FM gets most value for the taxpayer who are paying for these services.

Additionally, the broadcast of FM is significantly cheaper than on AM, which could have the potential to free up money previously spent on electricity bills and transmission costs. This is good value for the Australian government, and, by extension, the Australian taxpayer.

## I support these proposals

I support Proposal 1 (ABC Radio Perth, 6WF); Proposal 2 (ABC Radio National, 6RN); and Proposal 3 (ABC News Radio, 6PB).

It is welcomed that ACMA has found frequency space for the movement of these three services to FM.

I recognise that Proposal 1, in particular, requires some other broadcasters to amend their transmissions, and I hope that those broadcasters are given assistance to do so.

However, I would like to suggest:

- a) **that a similar exercise is undertaken in Sydney, Melbourne, Brisbane, Adelaide, Canberra and Hobart** - to at least find an FM frequency for the ABC Local Radio service in those cities. All the arguments about AM above are not unique to Perth.
- b) While I recognise that ACMA is not responsible for the contents of the **Parliamentary Proceedings Broadcasting Act 1946**, that this law is revisited with the evidence of current radio consumption. Australians would be better served with a comprehensive online service offering all proceedings from all state and federal governments, including upper and lower houses, commissions and estimates. Such a service could be searchable, contain proceedings available on-demand, and significantly enhance the visibility of our politicians by the Australian people. This could be operated by the ABC and funded as part of its service to Australians; and could result in the removal of the current limited and wasteful AM transmissions of federal parliament, which I would estimate is many millions of dollars in electricity and transmission maintenance.

I am grateful for the opportunity to give feedback.



**James Cridland**