

Date: 25/09/2025

To:

Australian Communications and Media Authority

Ref: "Proposal to vary the Perth and Remote Western Australia radio licence area plans"  
Consultation Paper August 2025  
ACMA

Submission of Radio Spice - Vijay Shinde  
High-Power Open Narrowcaster on 104.9 MHz, ERP 50 W

### **Executive summary**

Our station provides vital language, cultural, informational, and social-cohesion services to the South and Southeast Asian diaspora in Perth—a community that relies on us to stay connected with homeland news, cultural programs, events, language support, migration advice, and community networks.

We operate at a modest 50 W ERP (open narrowcasting classification). Our coverage is already constrained; many listeners report weak or no reception in suburbs where South/Southeast Asian communities are concentrated. We are under powered compared to full community or commercial services.

The current ACMA variation proposals (notably the conversion of ABC AM services to FM, and associated technical shifts) risk causing interference into our frequency or adjacent channels, further degrading our coverage.

Without accommodation, the changes would worsen existing inequities in access to radio for migrant communities—noting that mainstream media rarely provides the depth of language or cultural specificity we do.

In the public interest, we propose three feasible options:

1. Relocation of our transmitter to a more central to Perth, or elevated site (Perth Hills) within the Perth RA1 area with a moderated increase in ERP, subject to technical feasibility and

interference constraints.

2. Assignment of an alternate frequency [REDACTED]  
[REDACTED]

that provides a “clear path”

3. Allocation of DAB+ carriage to complement our analogue coverage and extend reach across greater Perth. We have discussed this with ABC Radio Perth official but they are unsure if this can be accommodated.

We urge ACMA to ensure that the variation plan not only supports high-power national and commercial conversions, but also respects the spectrum equity and community access obligations under the Broadcasting Services Act.

## **Background & context**

Role of our station in the migrant & CALD ecosystem (Cultural and Linguistically Diverse)

### **Cultural and language bridge**

Our station is one of the only media outlets in Perth that broadcasts in South and Southeast Asian languages (Hindi, Urdu, Bengali, Nepali, Punjabi, Tamil, etc.), offering music, homeland news talk, community announcements, religious programming announcement, migration related discussions, cultural events, and a connection to “back home.” For many in our listenership, we are the only media voice in their native or heritage language.

### **Information and social inclusion**

We broadcast immigration updates, visa and legal information, public health messaging (in-language), translated local news, community service announcements (e.g., welfare, aged care, health clinics, cultural festivals). In times of crisis (Bushfires, heatwaves, floods, pandemic), having accessible in-language communication is critical to safety and inclusion.

### **Cohesion, community building, diaspora networks**

Our station promotes cultural events (Diwali, Eid, Vesak, Navratri, Holi etc.), local community group announcements, and forums that help migrants integrate socially and culturally. We facilitate social capital among dispersed diaspora communities across Perth.

### **Equity & media diversity**

The mainstream commercial and national media generally do not serve these niche language audiences in depth. Spectrum and regulatory planning must not exclude already under-resourced niche broadcasters.

Listener feedback and demand

We receive calls, emails, messages from listeners all over Perth complaining of weak signal, dropouts, areas of no reception. This is real, ongoing, and indicates unmet demand.

## **Technical & population context**

The current Perth RA1 license area has a population of ~2,008,652 persons under the plan document.

Demographically, Perth is increasingly multicultural. Two in five residents are overseas-born.

WA's diversity profile shows that many Western Australians speak a language other than English at home.

The 2021 Census snapshot of WA permanent migrants underscores the significance and scale of these communities.

In local suburbs, migrants make up 60 % of residents in some areas.

The “FactBase 33: Connectivity of Perth’s Migrant Diasporas” highlights the strong importance of media, communication, and network links for diaspora integration.

Hence, the potential listener base for our station among Indian, Pakistani, Bangladeshi, Nepalese, Bhutanese, Afghani, Singapore Indian, Fijian Indian, Mauritian Indian, etc., is substantial (tens to hundreds of thousands across the metropolitan region). While we cannot provide an exact consolidated number without detailed demographic cross-tabulation, it is conservative to estimate the potential target community in Perth exceeds 100,000 -150,000 (and growing).

Given that many of these residents live in suburban and outer suburbs, weak signal or interference losses materially hamper our ability to reach them.

## **Assessment of ACMA’s proposals and risks to our service**

The variation plan proposes technical changes (including relocations or modifications) to existing services (including the open narrowcasting service on 103.3 MHz) to facilitate conversion of ABC national services to FM.

The paper acknowledges that “some existing FM services in Perth would need to change frequency” under certain options.

In the background materials, ACMA notes that the FM band has been constrained historically by legacy VHF TV use, limiting flexibility.

**Key risks to our service:**

**- Interference injection or co-channel reception deterioration**

The conversion and relocations of ABC or other services may increase interference across overlapping contour edges into our existing coverage footprint. This could make marginal reception zones unusable.

**- Forced frequency change or relocation burden**

We might be asked to shift frequency or relocate transmitter, imposing capital and operational costs, and potential loss of listeners during transition.

**- Coverage degradation or service loss in fringe areas**

Suburbs already only marginally served may fall entirely outside usable signal, further disenfranchising parts of the diaspora.

**- Weak negotiating leverage & spectrum inequity**

As a open narrowcaster, we have limited influence or resources to push back, yet our community role is critical. Without explicit protections, we risk being squeezed out.

**- Economic impact due to sponsorship challenges exacerbated by pandemic conditions.**

Our limited coverage area, coupled with the economic impacts of the COVID-19 pandemic, has already placed significant strain on our ability to attract and retain sponsorship and advertising revenue to support the station. Any further degradation or interference in signal quality will compound this financial challenge, threatening the station's sustainability and ability to continue serving our community effectively.

## **Proposed remedies / alternative options**

**Option 1: Transmitter relocation + ERP increase**

We request authority to relocate our transmitter to a more Perth central, or higher elevation site within Perth RA1 (ideally near a broadcast tower or site used by other broadcast services in Perth/Kalamunda Hills), subject to technical compatibility, coverage modeling, and interference protections. Accompany this with a moderate increase in ERP (within regulatory guardband limits), if technically safe, to strengthen signal into marginal areas.

**Option 2: Alternate frequency assignment**

Should a suitable “clean” frequency become available in the Perth FM band [REDACTED], we request allocation of that frequency to us. That must come with assured technical conditions (e.g. lower interference floor, appropriate protection zones).

**Option 3: DAB+ carriage (digital radio inclusion)**

Provide us with a slot on the Perth DAB+ multiplex (or relevant CALD or niche digital ensemble), so that we can reach listeners on digital receivers across the metropolitan area, particularly in fringe suburbs where our FM signal is weak. This does not replace our FM service but complements it, offering redundancy and enhanced reach without additional frequency congestion. ( We have discussed this with Perth ABC official about them sharing their Bandwidth, But they are unsure about the possibility)

**Legal, policy & regulatory arguments Objects of the Broadcasting Services Act (BSA), s.3**

The BSA promotes a diverse range of broadcasting services and services responsive to audience needs. Our station serves a minority community with distinct cultural and linguistic needs: forcing us out or degrading us runs counter to this object.

**Spectrum use equity & efficient use** The open narrowcasting classification is a recognized legitimate use under ACMA planning. While we are lower priority compared to national or commercial services, the variation plan must not unfairly burden these small operators in pursuit of enhancements for large broadcasters.

**Reasonable protection and transitional fairness** If technical changes are imposed on incumbents, ACMA should ensure transitional protections (e.g. phased implementation, compensation or support, guardband constraints, minimal disruption) so that community licensees aren’t disproportionately burdened.

**Principle of proportionality** Any interference or impact must be avoided; we ask that ACMA apply rigorous technical modeling to demonstrate that we will not be affected or else provide alternatives (As requested in above options) to avoid disproportionate harm.

**Public interest and social inclusion** Denying effective reach to marginalized migrant communities conflicts with broader democratic, social, and equity goals: inclusive media access, social cohesion, community integration, health and safety messaging to CALD groups.

**Suggested structure for ACMA to adopt in the variation plan** We respectfully urge ACMA to:

Explicitly safeguard existing open narrowcasters from harmful interference during conversion of ABC services, by embedding protective contour constraints, guardbands, and transitional mechanisms. Reserve or allocate one of the “additional high-power / wide-coverage frequencies” (as envisaged in the 2021 options paper) ACMA +1 for CALD community or niche broadcasters, or ensure that the conversions do not preclude future expansion of minority services.

Facilitate, as part of the variation, the possibility of frequency reassignment (for low-power niche services) when an interference-safe frequency emerges.

Make DAB carriage (or hybrid digital inclusion) a priority outcome for community and narrowcasting services to ensure equitable reach, particularly for under served linguistic communities.

### **Conclusion & call to action**

We respectfully request ACMA to:

- Adopt one or more of the mitigation options we propose (relocation + ERP increase, frequency reassignment, DAB carriage) to preserve and ideally enhance our ability to serve this important migrant and culturally diverse community.

Our listeners rely on us—not only for music and entertainment, but for language, identity, connection, community, and information. Any regulatory change that further marginalizes their voice would be a disservice to Australia’s multicultural commitment.

Thank you for your consideration.

Respectfully submitted,  
Vijay Shinde