



26 September 2025

The Manager  
Broadcast Carriage Policy Section  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

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

The following is a submission from the Sports Entertainment Network Pty Ltd (SEN) in response to the consultation paper, *'Proposal to vary the Perth and Remote Western Australia radio licence area plans'* (the consultation paper), released by the Australian Communications and Media Authority (the ACMA) in August 2025.

SEN also previously made a submission in response to the Options paper on this issue, *'FM broadcasting services band in the Perth RA1 licence area consultation 17/2021'*, which we have attached to this submission for reference.

### **Value of SEN to listeners in Perth RA1 licence area**

SEN operates commercial, open narrowcast and narrowband services across many areas (including both metropolitan and regional areas) of Australia. In the Perth RA1 licence area SEN operates SENTrack on 657 AM.

SENTrack offers comprehensive coverage of local sporting codes including AFL, WAFL, cricket, netball, basketball and community football leagues such as the Perth Football League (PFL), Goldfields Football Leagues (GFL) and South West Football League (SWFL).

SEN's offering in the Perth licence area is unique and its programming is deeply embedded in the local sporting culture, with editorial shows, news bulletins and live broadcasts tailored to WA audiences. Flagship programs such as Breakfast with Adam Simpson & Tim Gossage and Sportsday WA feature local icons such as Scott Cummings, Paul Hasleby, Mark Duffield and Peter Vlahos. It provides a platform for regional voices, ensuring that Perth's sporting stories are heard and celebrated.

SEN's audience is notably diverse: 53% are first or second-generation Australians, 27% speak a language other than English at home and 28% were born overseas. Nearly half (49%) have at least one parent born outside Australia.<sup>1</sup> This cultural and linguistic diversity reflects SEN's commitment to serving all Australians, making it a powerful platform for community connection, regional storytelling and inclusive engagement across Perth and beyond.

### **Concerns raised in response to options paper remain/not addressed**

In 2021, in response to an Options Paper for replanning FM frequencies in the Perth RA1 licence area,<sup>2</sup> SEN made a submission to the ACMA expressing deep concern at the prospect of it being one of only

<sup>1</sup> Source: Roy Morgan, Apr 2024–Mar 2025.

<sup>2</sup> FM broadcasting services band in the Perth RA1 licence area: Options Paper; See <https://www.acma.gov.au/consultations/2021-04/fm-broadcasting-services-band-perth-ra1-licence-area-consultation-172021>

two stations in the Perth licence area which the ACMA was not proposing to convert to FM. SEN expressed the view (which it continues to hold), that Option 1 in the ACMA's Options Paper, which proposed that the three national ABC AM services and two commercial AM services should be converted to FM, was not the option that best promoted the objects of the *Broadcasting Services Act 1992 (BSA)* and that it would be put at a significant commercial disadvantage if it is the only, or one of only two, services in the Perth radio broadcast market for which there is no plan or pathway to FM.

The ACMA subsequently released an Outcome statement on 14 September 2022 stating that it intended to proceed with Option 1 in the Options Paper.<sup>3</sup> SEN continues to be extremely concerned that the outcome statement did not address concerns raised by SEN and others that there is a clear risk that if only one or two broadcasters are excluded from the plan for conversion to FM, it will deter listeners from tuning in to those stations, devaluing the licences of those broadcasters and reducing diversity in the market.

### **ACMA planning guidelines require promotion of a diverse range of services**

The ACMA's policy guidelines document, 'ACMA's approach to broadcast planning and varying licence area plans',<sup>4</sup> provides that the objects of the BSA should be considered in its broadcast planning. In particular, it notes that the object of promoting a diverse range of radio services and entertainment should be considered. It notes the importance of ensuring Australian's are not underserved due to inadequate reception.<sup>4</sup>

Narrowcasters including SENTrack provide an important contribution to the diversity of radio services in the Perth Market. In SEN's view, the planning guidelines require exploration of how the available FM spectrum can be utilised to maintain this diversity into the future. However, Option 1 as put forward by the ACMA will put existing services in the market, and the diversity of services that they contribute to, (those for which no plan to transition to FM has been made), at risk.

### **Importance of conversion of services to FM in Perth licence area**

As previously noted by SEN and other stakeholders, the ACMA's own report, 'The Future delivery of radio', found that AM technology has a number of shortcomings including high susceptibility to interference from electrical noise, high power consumption and high infrastructure costs, and that it is a technology that is in decline.<sup>5</sup> It not only identified the conversion of commercial, community and national services from AM to FM as a planning priority,<sup>6</sup> but 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'.<sup>7</sup>

While narrowcast licences are subject to different terms than 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. In SEN's submission, the ACMA's planning

<sup>3</sup> See <https://www.acma.gov.au/consultations/2021-04/fm-broadcasting-services-band-perth-ra1-licence-area-consultation-172021#outcome>

<sup>4</sup> ACMA's approach to broadcast planning and varying Licence Area Plans, 6-10, see <https://www.acma.gov.au/am-fm-conversions>

<sup>4</sup> Ibid.

<sup>5</sup> The future delivery of radio, Final report; see <https://www.acma.gov.au/publications/2020-03/report/future-delivery-radio>, 9.

<sup>6</sup> Ibid.

<sup>7</sup> Ibid, 33.

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should recognise this and give full consideration to options that would better promote these objects of the BSA by accommodating all licensees impacted by the geographic issues faced in Perth.

## Ensuring efficient use of spectrum responsive to audience needs

While 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'*,<sup>8</sup> SEN's preliminary engineering investigations suggest that the available FM spectrum, as identified by the ACMA, can be much more efficiently deployed so as to ensure all broadcasters (including SEN and Radio Tab) can be accommodated in a conversion exercise. In these circumstances, SEN's strong view is that alternative planning options that can better accommodate existing services in the market would be both more efficient as well as more responsive to audience needs.

This is particularly the case where the ACMA is seeking agreement between commercial broadcasting licensees as noted in the outcomes statement and where no such agreement is reached. In these circumstances, efficiency would be best achieved by making the spectrum available for alternative purposes.

## Summary and recommendations

In summary, SEN remains very concerned that it has 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 made available by the clearance of VHF Band II analog TV on channels 3 and 5 in Bunbury.

There is a significant risk that, if implemented, and only one or two broadcasters are excluded from the proposed plan for conversion to FM, it will deter listeners from tuning in to those stations, devaluing the licences of those broadcasters and ultimately leading to a reduction of diversity in the market.

We recommend that other options that are more responsive to audience needs in the licence area be explored, and that both SEN and Radio TAB be included in the ACMA's considerations moving forward.

We would welcome an opportunity to discuss this submission with you and to provide any further information that the ACMA requires.

Yours Sincerely

**SPORTS ENTERTAINMENT NETWORK PTY LTD**



**Jodie Simm**  
Chief Operating Officer

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<sup>8</sup> <https://www.acma.gov.au/am-fm-conversions>, 13.



21st June 2021

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## **Re: FM broadcasting services band in Perth RA1 licence area - Options Paper**

The following is a submission from the Sports Entertainment Network Pty Ltd (SEN) in relation to the options paper released by the Australian Communications and Media Authority (the ACMA) concerning FM broadcasting services band in the Perth RA1 licence area.

SEN operates commercial, open narrowcast and narrowband services across many areas (including both metropolitan and regional areas) of Australia and New Zealand – the latter as Sports Entertainment Network NZ Ltd.

We understand that the comments made in relation to this matter at this point in time will contribute to informing the ACMA on further actions for replanning the FM broadcasting services band in the Perth RA1 licence area and that subject to the outcomes of this consultation, the ACMA will consult again on the possible technical proposal for the Perth replanning as a basis for subsequent Licence Area Planning (LAP) variation.

### **General**

Whilst each of the "options" presented in the paper are discussed in some detail it is of immediate and serious concern that the press release specifically states that "the only AM stations left (if FM conversion were to proceed) would be SEN and TAB Radio". We worry that a public statement like this indicates this as a 'fait accompli' which would leave both SEN and TAB Radio at a significant disadvantage to the rest of the Perth radio broadcast market.

Regardless of initial views formed from this round of consultation and as a key stakeholder impacted by any changes, we would welcome the opportunity to discuss the ACMA's views prior to the next stages of any process including the release of any further options papers.

### **The Options Paper**

Returning to the Options Paper. We are supportive of the approach to convert AM to FM in markets – not only in Perth but also across the broader Australian radio marketplace.

AM services are, as has been reported in numerous reports and occasions in the past (including in the *The future delivery of radio: Final report*<sup>1</sup>), a technology that is much less attractive as both an owner and user-friendly medium. By "friendly" I mean there is a much greater emphasis by users to access the medium via streaming or DAB+ for convenience, quality and ease of listening. In addition, from a licensee perspective, the costs associated with operating AM services are much more expensive with AM equipment becoming less accessible, AM technical resources limited, less

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<sup>1</sup> Australian Communications and Media Authority, [The future delivery of radio \[webpage\]](#), ACMA website, March 2020, accessed 20 April 2021.

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supported in motor vehicles and less accessible in in-home devices because of the more heavily promoted DAB+/FM devices.

As a cumulative impact the opportunity to move to an FM environment from AM – as the Perth scenario now presents, must be fully explored and taken advantage of for all parties particularly given the acknowledgement of the Perth geography, the adverse environmental conditions for AM propagation and impulse noise from electric rail and powerlines as noted in the Options Paper.

This situation and opportunity in Perth present, for comment, an opportunity for one metropolitan market at least to provide an equal platform for all broadcasters if planning is undertaken with a broader perspective in mind – not one that is purely focussed on the named commercial operators and the ABC/SBS.

As a consequence, we cannot support any of the options in their current form. Rather we would offer an alternative and additional option.

To be clear, the options presented in the ACMA paper are:

- **Option 1:** Convert to FM both commercial services (6IX and 6PR) and the national ABC AM services (6PB, 6WF and 6RN).
- **Option 2:** Convert to FM the 3 national ABC AM services (6PB, 6WF and 6RN) only. Under this option, the commercial AM services would not convert to FM.
- **Option 3:** Convert to FM both commercial AM services (6IX and 6PR) and plan (and subsequently allocate licences for) 3 new high-power FM services in the Perth licence area for commercial radio broadcasting, national radio broadcasting and/or open narrowcasting services. Under this option, the ABC AM services would not convert to FM.
- **Option 4:** Convert to FM one of the 3 national ABC AM services (6PB, 6WF or 6RN). Under this option, the other 2 national ABC AM services and the commercial AM services (6IX and 6PR) would not convert to FM. This option would minimise changes to the existing services.
- **Option 5:** Plan (and subsequently allocate licences for) 3 new high power FM services in the Perth LAP for commercial radio broadcasting, national radio broadcasting, community broadcasting and/or open narrowcasting services. Under this option, the ABC and commercial AM services would not convert to FM.

## The SEN preferred option:

The option we present to the ACMA is an extension of the current option 1 (above) and includes both SEN and Radio TAB.

Preliminary engineering investigations suggest that the available FM spectrum, as identified by the ACMA, can be much more efficiently deployed so as to ensure all broadcasters (including SEN and Radio Tab) can be accommodated in a conversion exercise.

SEN are of the view this is a much more efficient use of the spectrum and one that provides an equitable and fair outcome for all broadcasters in the Perth RA1 market.

If a conversion to a “more palatable” solution for the majority of the market is proposed and free to only a nominated number of licensees (at the exclusion of two) the outcome is not fair and equitable.

As stated, preliminary engineering suggests there is capacity to accommodate the option proposed.



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## Summary

It is our strong view that a fair and equitable solution for FM in Perth RA1 can be achieved for all current licensees by effectively and efficiently utilising the advantages or opportunities presented through the utilisation of spectrum made available or presented by the clearance of VHF Band II analog TV on channels 3 and 5 in Bunbury.

It is essential that both SEN and Radio TAB be included in ACMA considerations moving forward.

We welcome the opportunity to answer any questions or provide any further information in support of our submission.

Yours Sincerely

**SPORTS ENTERTAINMENT NETWORK PTY LTD**



**Jodie Simm**  
Chief Operating Officer