

**The Manager**

Broadcasting Carriage Policy Section  
Australian Communication and Media Authority  
PO Box 78  
Belconnen ACT 2616

Tuesday 7 October, 2025

**RE: Proposal to vary the Perth and Remote Western Australia Radio Licence Area Plans**

I am writing as a Perth listener and long-time supporter of public broadcasting to express my concerns regarding the proposed AM-to-FM conversions for ABC services in the Perth licence area.

While I strongly support the conversion of AM services suffering from reception issues, I believe the current proposal provides disproportionate benefit to multiple ABC services at the expense of spectrum fairness and listener choice across the broader Western Australian Community.

**1. Support for AM to FM conversion (where justified)**

The proposal correctly identifies that AM services in Perth suffer from significant reception issues, particularly from impulse noise caused by electric railway infrastructure and powerlines, as well as poor ground conductivity and topography.

These factors have long affected both public and commercial AM broadcasters – most notably ABC Radio Perth (6WF 720AM) and 6PR (882AM). I fully support converting such services to FM to improve reception quality and ensure reliable access for listeners.

**2. Spectrum fairness and overrepresentation of ABC networks**

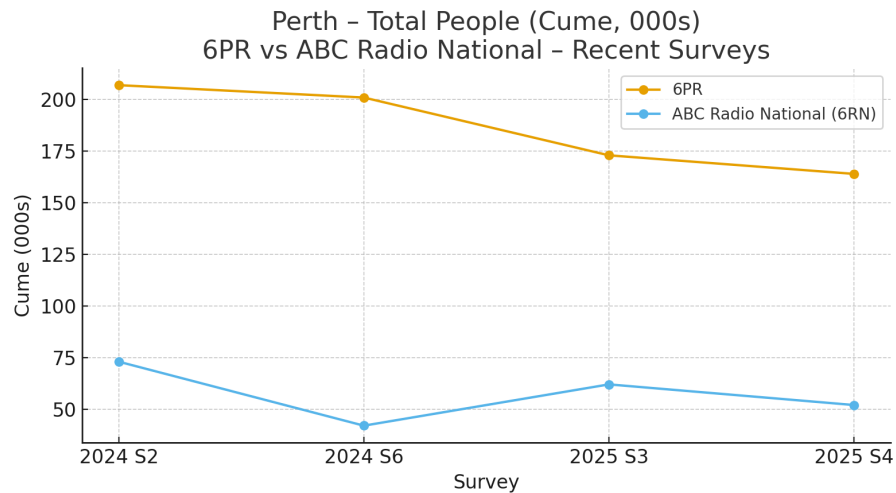
However, under the current proposal, three additional ABC stations – Radio National (6RN), NewsRadio (6PB), and ABC Perth (720AM 6WF) – would all be allocated FM frequencies. Combined with ABC Classic and Triple J, this would result in five ABC stations operating on the FM band in the Perth market. Plus, due to provisions in the broadcasting act, NewsRadio (6PB) would need to continue simulcasting on AM.

This level of representation risks overcrowding out other voices and reducing diversity on the FM spectrum, particularly given that the FM band is already congested and no comparable opportunity appears to have been extended to commercial or community broadcasters affected by similar reception problems.

**3. Audience impact and ratings evidence**

The GfK Radio Ratings (Survey 4, 2025) demonstrated that 6PR Perth consistently serves a larger local audience than either ABC NewsRadio or Radio National:

Station	Share (10+)	Cumulative Audience ('000)
6PR Perth	5.5%	164,000
ABC NewsRadio (6PB)	2.0%	82,000
ABC Radio National (6RN)	1.1%	52,000



6PR also provides substantially more local content than ABC NewsRadio and ABC Radio National, making it a more significant contributor to local information, news and emergency communication. Given this, it is difficult to justify prioritising two lower-rating ABC national services for FM conversion ahead of a higher-rating, locally focused commercial broadcaster facing the same transmission impairments.

#### **4. Legislative obligations under the PPBA**

The Parliamentary Proceedings Broadcasting Act 1946 requires that parliamentary proceedings be broadcast from a medium-wave national broadcasting station in each capital city.

The ACMA proposal itself acknowledges this, stating;

“It is proposed to make 104.1 MHz frequency available to allow the 6PB service to broadcast on FM while also continuing on AM (585 kHz) in order for the ABC to comply with the PPBA.”

Given that 6PB (NewsRadio) must remain on AM to satisfy this statutory requirement, granting it an additional FM licence provides no legislative necessity and occupies valuable FM spectrum that could instead improve reception for a station such as 6PR (the DAB+ service lacks comparable reach).

#### **5. Public interest and listener choice**

FM frequencies are a scarce public resource. Their allocation should balance technical need, audience impact and market diversity.

By granting multiple FM frequencies to national broadcasters that already enjoy digital and online distribution, the current proposal risks narrowing listener choice rather than expanding it. If ACMA's rationale is based on addressing AM interference, then 6PR's technical and audience case is equally, if not more, compelling than that of the ABC NewsRadio or Radio National.

## **6. Safeguarding content in an increasingly networked industry**

In an era where most commercial radio networks are centralising programming and replacing locally produced programs with syndicated content from Sydney or Melbourne (96fm tries to dupe listeners to thinking their afternoon presenter is in Perth – in reality he pre-records his show in Adelaide), 6PR remains one of the few stations still maintaining a significant level of live and local programming for Western Australian audiences. The current ACMA proposal does nothing to address this broader trend – in fact, by allocating multiple new FM frequencies to national broadcasters that already rely on networked content, it risks accelerating the decline of locally produced radio.

The preservation of strong local voices, like 6PR, is not merely a matter of market competition; it is essential to the resilience of Western Australia's media ecosystem. FM conversion for 6PR would ensure the last remaining local talk and news station in Perth can remain technically competitive and continue serving its community with relevant responsive programming. Without technical parity, the commercial incentive for maintaining local production will inevitably diminish – leading to the same homogenisation of content that has already eroded local radio diversity across much of regional Australia.

## **7. Recommendations**

I respectfully urge ACMA to;

- Prioritise the conversion of ABC Perth (6WF) to FM due to its critical public-service role and clear reception deficiencies.
- Retain 6PB (NewsRadio) on AM to maintain compliance with the Parliamentary Proceedings Broadcasting Act, and consider a limited FM simulcast only after other affected services are addressed.
- Invite submission from 6PR and other AM broadcasters within the Perth licence area to ensure equitable access to available FM spectrum.
- Assess spectrum allocation on the basis of combined audience reach, local content contribution and community impact – not just network ownership.

## **Conclusion**

The proposed conversions would give the ABC five FM frequencies in the Perth market, while higher-rating local broadcasters continue to suffer from identical AM interference problems. This outcome does not appear to represent the best interest of Western Australian audiences or the broader broadcasting landscape.

I strongly encourage ACMA to reconsider the allocation of FM spectrum under the proposal to ensure that technical upgrades are implemented equitably and that listener diversity, competition, and fairness remain central to future planning.

Yours sincerely,

Steve Marshall  
Perth, Western Australia