

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

Comments on the ACMA Addendum Consultation paper

October 2025

1. Introduction

- 1.1 The Community Broadcasting Association of Australia (CBAA) welcomes the opportunity to respond to the ACMA consultation entitled, 'Addendum - Proposal to vary the Perth and Remote Western Australia radio licence area plans', October 2025.
- 1.2 The CBAA is the peak body for community broadcasting licensees in Australia.
- 1.3 The Addendum consultation paper picks up on comments made by the licensee of the 6SEN community broadcasting service in Perth and the CBAA, in response to the previous consultation paper issued by the ACMA, August 2025.
- 1.4 These consultations to vary the Perth radio licence area plan (LAP) follow 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
- 1.5 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.
- 1.6 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.
- 1.7 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. This remains an important point.
- 1.8 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.
- 1.9 These matters continue to progress well. 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.
- 1.10 The finalisation of these matters is expected by or before 31 December 2025, at which point both licensees will update the ACMA. It had been expected this would align with timelines for consideration and finalisation of the changes to the Perth Radio LAP.
- 1.11 The CBAA understands the licensee of 6SEN maintains the view that it would not be appropriate for the ACMA to finalise changes to the Perth Radio LAP until after 6SEN is able to advise the ACMA that negotiations regarding revised transmission infrastructure and transitional arrangements are finalised to the satisfaction of 6SEN.

2. Revised radiation pattern proposed by ACMA for 6SEN

- 2.1 Taking into account comments made by the licensee of 6SEN and the CBAA, the ACMA Addendum consultation paper, October 2025, proposes a revised horizontal radio pattern specification, now similar to the horizontal radiation pattern of the other community radio services operating from the transmitter sites at Bickley.
- 2.2 The revised proposed technical specification has a horizontal radio pattern limiting maximum ERP in various arcs, summarised as follows:

0°T to 50°T	16 kW
50°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

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>

3. Support for revised radiation pattern for 6SEN

- 3.1 Both 6SEN and the CBAA support the alignment and flexibility that adopting the revised specification proposed by the ACMA in the Perth Radio LAP would provide for 6SEN, with some caveats.
- 3.2 An assessment of the transmission site infrastructure options that are practical for implementation indicate the revised specification is able to be met in terms of maximum ERP limits, and a special licence condition would be necessary to relax the need to comply with the Technical Planning Guidelines (TPG) requirements in respect of minimum coverage, in the arc 50° through to 200°.
- 3.3 Therefore, the CBAA supports the revised specification for 6SEN as proposed by the ACMA being used in the Perth Radio LAP, subject to ACMA agreement to add a special condition on the associated revised license documentation to be issued to 6SEN, if and when sought by 6SEN, that has the effect of relaxing the need to comply with the TPG requirements in respect of minimum coverage in the arc 50° to 200°.
- 3.4 The expected outcome is to improve coverage of 6SEN to the wider Perth area in most populated listener locations, while acknowledging there are practical considerations as a result of the deliberate limitations to ERP imposed, to the South and South East.
- 3.5 In relation to transition, the CBAA understands that, should a revised specification be adopted in the Perth Radio LAP for 6SEN, the current licensing documentation for 6SEN continues to apply, including in terms of its current transmit site location, unless and until the licensee of 6SEN requests and is granted revised license documentation. If necessary, to give comfort, the ACMA may wish to confirm and make that explicit in correspondence with the licensee of 6SEN.