



Submission by Narrowcast Australia Inc.

Re: Proposal to vary the Horsham license area plan

This submission is made by Narrowcast Australia Inc in response to the Australian Communications and Media Authority consultation on the proposed variation to the Horsham license area plan, which is open for comment until 12 June 2026.

Narrowcast Australia Inc acknowledges the ACMA's objective of improving listener outcomes through AM to FM conversion planning, including better audio quality, reduced interference and lower transmission costs for broadcasters. However, the current Horsham proposal highlights broader structural issues in regional broadcast planning that should also be addressed through this process.

Coverage and infill

The consultation paper states that the proposed 3WM Horsham FM transmitter, together with the Ararat, Nhill and Edenhope infill transmitters, would still produce a population coverage loss of approximately 23.04% to 37.48% compared with the existing AM service and existing infill arrangements, and for that reason ACMA considers the loss unacceptable. The paper also states that ACMA and Ace Radio have agreed that the 3WM AM transmitter should remain in operation after FM is introduced because Horsham is considered suitable for a town-based dual coverage FM upgrade rather than a full conversion.

Narrowcast Australia Inc submits that, where a proposal identifies coverage loss on this scale, the planning response should not stop at maintaining the legacy AM service. Additional infill opportunities should be actively examined to restore the lost service footprint over time, particularly in regional and sparsely populated areas where local radio remains essential. ACMA's October 2025 AM to FM conversion update states that broadcasters are expected to address coverage loss for full conversions and to present

plans to maintain service under dual-coverage upgrades. That principle should be applied more strongly here through a wider infill strategy.

Spectrum planning

The Horsham proposal focuses on the needs of incumbent commercial and community broadcasters, but it does not sufficiently consider future spectrum access for genuinely local HPON, LPON and MF-NAS services. ACMA's planning framework emphasises efficient use of spectrum and the maintenance of services for listeners. In Narrowcast Australia Inc's view, that objective would be better served by making additional low-power spectrum opportunities available within and around the license area, especially where low-power services can be tightly planned with limited interference risk.

Narrowcast Australia Inc submits that more HPON opportunities should be created in regional areas and that channel spacing for low-power services should be reviewed where technical evidence supports closer reuse. Because HPON and LPON services operate at low power and with limited coverage footprints, they can often be placed in ways that improve local diversity without materially affecting broader license area planning outcomes. This is especially relevant where local communities are underserved by highly networked commercial or syndicated community services.

License allocation

Narrowcast Australia Inc proposes that HPON, LPON and MF-NAS licenses be allocated under a framework that gives greater weight to local ownership, local service delivery and local relevance rather than relying primarily on price-based outcomes. This would better support the development of services that are responsive to the needs and identity of the local area, especially in regional markets where local operators are often best placed to provide genuinely place-based content.

Greater weighting should be given to locally based applicants over national networks or large commercial broadcasters when allocating low-power and narrowcast-style services. At the same time, commercial broadcasters seeking expansion should continue to have an appropriate pathway through the commercial licensing system rather than relying on narrowcast-style authorisations to deliver broadly based services. This would preserve narrowcasting for its intended purpose while maintaining a pathway for legitimate commercial growth.

Christian services

Narrowcast Australia Inc submits that Christian services operating under narrowcast licenses should be considered for a pathway to community broadcasting licenses where their appeal, service profile and

audience reach are broader than the narrowcast category was designed to accommodate. Where a service has a broad community role and serves a wide section of the public, the present regulatory classification may no longer reflect the reality of how that service operates.

According to the 2021 Australian Census, about **11.1 million Australians** identified as Christian, which was **43.9%** of the population.

A more suitable pathway would allow those services to transition into the community broadcasting framework where appropriate, while freeing narrowcast capacity for truly niche or locally specific programming. This would be better to align license categories with actual audience appeal and community function.

Commercial pathways

Narrowcast Australia Inc also submits that commercial broadcasters or commercially operated services using HPON, LPON or MF-NAS Such as TAB and S.E.N. (both commercial Entities retransmitting on HPON and LPON) platforms should be offered a clearer opportunity to obtain commercial licenses within the relevant area where their service model is, in substance, broad appeal commercial broadcasting. ACMA's planning principles recognise that individual proposals must be assessed under Part 3 of the Broadcasting Services Act and regarding efficient and appropriate service planning. A clearer migration path would reduce regulatory distortion and create a fairer division between true narrowcasting and commercial broadcasting.

65% of Australian residents are “sport engagers” — meaning they engage with sports they regularly follow across traditional and digital media. Australian Government data shows that sport engagement is widespread in Australia, with ABS and Australian Sports Commission figures indicating millions of Australians participate in sport and physical recreation each year.

This would also help return low-power and narrowcast licensing to its original role: supporting niche, local and special interest services that are not well served by mainstream operators. Where larger operators have the financial capacity to compete in the broader commercial market, there is a strong policy case for directing them into that framework instead of allowing sustained reliance on narrowcast-style arrangements.

Power limits

Narrowcast Australia Inc submits that 1-watt LPON and MF-NAS limits in regional areas are no longer adequate for practical local service delivery in many country towns and districts. Regional conditions

differ greatly from dense metropolitan environments, and a modest increase in permitted power can materially improve usefulness without creating the same interference concerns that may arise in larger urban markets.

Accordingly, consideration should be given to increasing the maximum power for LPON services in regional areas from 1 watt to 10 watts, subject to appropriate engineering controls. MF-NAS power increased from 400 watts to 1 kW, enhancing small local services and enabling more effective delivery of regional content.

Local content

The consultation paper presents the existing commercial and community services as continuing to meet listener needs, but many regional listeners increasingly receive highly networked programming with only limited local material under 70 minutes per week. Narrowcast Australia Inc submits that the broader planning framework should place much greater emphasis on actual local content outcomes, not merely technical service availability.

At a minimum, commercial and community broadcasters serving regional license areas should be expected to provide a measurable amount of locally produced content within the license area. Narrowcast Australia Inc supports a minimum threshold of 15 to 30 hours per week of local content produced within the relevant LAP area and considers that stronger expectations should also be explored where services present as local but rely heavily on networking or syndication.

Legislative review

ACMA's AM to FM conversion policy reflects an effort to modernise regional radio planning within the current statutory framework. However, the Broadcasting Services Act 1992 was developed before streaming, platform convergence and the current degree of broadcast centralisation, and it does not adequately reflect the way many audiences now access audio services or the extent to which local terrestrial radio has been hollowed out in most markets.

Narrowcast Australia Inc submits that, if localism and service diversity cannot be restored through planning practice alone, then a serious review of the Broadcasting Services Act 1992 is required. LPON and HPON operators are often better equipped to provide truly local services than larger networked operators, and the legislation should evolve to recognise that reality more clearly.

Requested outcomes

Narrowcast Australia Inc asks ACMA to consider the following outcomes as part of this process and in future regional planning work:

- Examine whether additional infill transmitters can reduce the substantial residual coverage loss identified in the Horsham proposal.
- Create more opportunities for HPON services in regional areas and review technical spacing arrangements for low-power services where feasible.
- Increase LPON power limits in regional Australia from 1 watt to 10 watts, subject to technical safeguards.
- The higher-power approach should not apply in inner-city areas. (except for MF-NAS)
- MF-NAS should be increased to 1 kW where coverage has been inadequate due to accumulated noise and degraded reception over the last 30 years.
- Adopt a local-first allocation approach for HPON, LPON and MF-NAS licenses, with more weight given to local entities than to national or major commercial applicants.
- Provide a pathway for Christian narrowcast operators with broad community appeal to move into the community broadcasting framework.
- Provide a pathway for commercially operated narrowcast-style services to obtain commercial license in the relevant area where their services are broad in nature.
- Strengthen local content expectations for commercial and community broadcasters, including a minimum of 15 hours per week of local content within the license area.
- Consider broader legislative reform if existing planning mechanisms cannot restore local relevance and service diversity.

Closing

Narrowcast Australia Inc supports improved listener outcomes in Horsham and acknowledges ACMA's stated objective of using spectrum efficiently while maintaining services for listeners.[page:1][page:2] However, the Horsham proposal should also be used as an opportunity to address the deeper policy issue of whether current planning settings are still delivering genuinely local, diverse and properly classified radio services in regional Australia.