

# **Proposal to remake the Broadcasting Services (Technical Planning) Guidelines 2017**

## Consultation paper

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# Executive summary

## ***Purpose of the consultation***

Under Part 4 of Chapter 3 of the *Legislation Act 2003*, most legislative instruments ‘sunset’. That is, they are repealed automatically on 1 April or 1 October that first occurs 10 years after they were registered on the Federal Register of Legislation. This is an automatic process applying to most legislative instruments regardless of their content.

The [Broadcasting Services \(Technical Planning\) Guidelines 2017](#) (TPGs) are due to sunset on 1 October 2027.

We have formed the preliminary view that the TPGs are operating effectively and efficiently and, as such, continue to form a necessary and useful part of the broadcasting services technical regulatory framework (Framework). However, we have identified areas for improvement in the TPGs and the wider Framework. We propose to remake the TPGs in a new instrument before the sunset date, with changes to the TPGs and other parts of the Framework, as outlined in this paper, so that the TPGs’ ongoing effect is preserved.

The aim of our review of the Framework is to propose changes that support maintaining access to radio services for audiences, while supporting the industry as it transitions in response to technology evolution and changing audience preferences. It also aims to increase flexibility in assessing proposals from licensees, to reduce administrative burden and to increase alignment of some requirements across broadcasting service types.

This paper seeks comment on the ACMA’s preliminary view. Once views on this consultation are received and considered, we will then proceed to draft instruments for a future consultation.

## ***Scope of the consultation***

The Framework includes the [Broadcasting Services Act 1992](#) (BSA), the [Radiocommunications Act 1992](#) (RA), the [Radiocommunications Licence Conditions \(Broadcasting Licence\) Determination 2025](#) (LCD), licence area plans (LAPs), and digital radio channel plans (DRCPs).

Only changes to the TPGs, the LCD and LAPs for radio broadcasting services (radio LAPs) are within the scope of this consultation. We will continue to propose areas for improvement to the BSA and RA to the [Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts](#) (the Department), where appropriate, to address issues which can only be resolved through changes to primary legislation.

As the review of some clauses of the BSA and RA also align with the aims of this consultation, we will continue to propose ideas for improvement to the primary legislation to the Department.

### ***Issues with the current legislative framework***

The aim of the remake is to:

- Reduce the number of LAP variations for small changes in operating specifications, which may require increasing the flexibility in the application of the TPGs including minimum coverage and overspill criteria.
- Reduce the need for regulatory forbearance.
- To increase alignment between the TPGs and LCD and across broadcasting service types where relevant.
- To increase clarity.

We have identified several areas in the legislative framework that improvements to the Framework could largely address:

- The large administrative burden created by the high number of LAP variations for minor technical changes and the long periods of regulatory forbearance required to accommodate those changes.
- The lack of provisions for standby or disaster recovery transmissions that do not meet the Framework requirements that must be accommodated through regulatory forbearance.
- The disparity between largely similar areas of the TPGs and LCD with different obligations for different broadcasting service types.
- The prescriptive nature of the minimum coverage criteria for relevant services that contributes to the high frequency of LAP variations and need for regulatory forbearance.
- The prescriptive nature of the overspill criteria for relevant services that contributes to the high frequency of LAP variations and need for regulatory forbearance.
- The lack clarity of intent and application in some parts of the TPGs.

We consider that these issues can be substantially resolved by changes to the TPGs, the LCD and future amendments to radio LAPs, as proposed in this paper. Some proposals may have perceived impacts upon broadcast service planning, so we also discuss those possible implications.

### ***Next steps***

This is the first stage of consultation, and we welcome views on the identified issues and any other issues that submitters see as important to improve the way the Framework operates. We will review submissions and prepare revised TPGs, and any other necessary instruments, which will be subject to a second stage of consultation.

The steps in the process are described below.

**Table 1: Steps in the process**

| Step                                                                                    | Date              | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation closes                                                                     | 23 September 2026 | We propose a 6-week consultation period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Publication of public submissions                                                       | Q3 2026           | We intend to publish public submissions as soon as is practicable after the end of the consultation period.                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Development period for draft legislative instruments                                    | Q3–Q4 2026        | After views on this consultation are received, we will prepare instruments for a second stage of consultation.                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Consultation on proposed changes to the TPGs and other relevant legislative instruments | Q1 2027           | We propose a 6-week consultation period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Publication of public submissions                                                       | Q1 2027           | We intend to publish public submissions as soon as is practicable after the end of the consultation period.                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Remaking of instruments                                                                 | Q2 2027           | <p>If we remake the TPGs and make changes to any other relevant legislative instruments, these new instruments will be published on the Federal Register of Legislation along with their accompanying explanatory statements.</p> <p>An outcome statement will also be released on the ACMA website, or depending on submissions received to the second stage of consultation, a short Outcomes paper may be published. Submissions to the consultation on proposed changes to the TPGs will also be published on the ACMA website.</p> |

# Issues for comment

We welcome comments – general or specific – from interested stakeholders on any of the issues and ideas discussed in this paper.

1. Do you consider the identified scope of consideration for changes to the Framework appropriate? If not, should it be expanded, and in what ways?
2. What are your views on the observed issues with the Framework and do you consider other issues should be addressed?
3. Do you believe there is benefit in reviewing the minimum coverage criteria? If so, what are those benefits?
4. What other relatively frequent scenarios have issues that should be addressed? Give specific examples.
5. Do you think the TPGs or any other part of the Framework would benefit from further clarity? Which areas would benefit from further clarity? What have you found unclear and how has this affected you?
6. What are your views on use cases for exemptions to minimum coverage criteria to support emergency and standby transmissions? Should any other cases be considered? What are your views on the proposals to change the minimum coverage criteria and the potential other ways to change its application canvassed by the ACMA? Do you have any other views on the application of, and the need for, the minimum coverage criteria?
7. Do you think proposed changes to the overspill criteria, including the introduction of a possible new criterion (relating to assessing overspill at nominal sites), would be beneficial and would you agree with the introduction of such a new criterion? Under what use cases would you see the possible new criterion, aimed at increasing flexibility, being used?
8. Do you see benefit in the alignment of start up procedures between the TPGs and the LCD?
9. Do you see benefit in the alignment of interference management procedures between the TPGs and the LCD?
10. Would you see benefit in any parts of the TPGs being moved to the LCD as proposed? What parts and what benefits would this bring? If these parts were moved, do you think these conditions should apply to a broader set of broadcasting service classes than they do now, or even be standardised across broadcasting services?
11. What are your views on introducing flexibility to maximum antenna height and maximum ERP in radio LAPs?
12. What are your views on the risks of increasing flexibility to the TPGs and radio LAPs?
13. What are your views on the risks of changes to the minimum coverage criteria?
14. What are your views on the risks of possible differential minimum coverage criteria between TCBLs and long-term community broadcasting licences?
15. What are your views on the risks of changing the interference management requirements for broadcasting services, narrowcasting services and 're-transmission services'?

We welcome any other comments on in-scope items of this review.

The ACMA will consider all submissions received on this paper before preparing a draft instrument to remake the TPGs, and possibly draft instruments making changes to the other instruments as discussed in this paper. Any draft instruments resulting from this consultation will be subject of further consultation.



# Legislative and policy environment and scope of possible changes

## Summary of the Framework elements

The TPGs form part of the wider broadcasting services Framework, which also includes (but is not limited to):

1. **Ministerial designation of the broadcasting services bands:** this instrument is made under subsection 31(1) of the RA and designates a part of the spectrum as being primarily for broadcasting and to be planned under Part 3 of the BSA. A copy of this designation can be found on the webpage for this consultation.
2. **BSA:** Relevant parts of the BSA include broad requirements for planning the broadcasting services bands, including the preparation of LAPs by the ACMA and mechanisms that allow for the alternative use of the broadcasting services bands. The broadcasting service categories defined by the BSA are: national broadcasting services (such as those provided by the ABC and SBS); commercial broadcasting services; community broadcasting services; subscription broadcasting services; subscription narrowcasting services; open narrowcasting services; and international broadcasting services.
3. **RA:** A transmitter licence (TL) is a kind of apparatus licence (the other kind being a receiver licence) which the ACMA may issue under the RA. Relevant parts of the RA provide that if a person is allocated a broadcasting services bands licence under the BSA, the ACMA must issue the person a TL so that the person can transmit the broadcasting service. TLs are also issued to national broadcasters, and for the provision of open narrowcasting services. The RA also includes core licence conditions, including those which apply to TLs for certain broadcasting services.
4. **LAPs:** The ACMA makes LAPs under section 26 of the BSA, to determine the number and characteristics, including technical specifications, of broadcasting services that are to be available in particular areas of Australia (licence areas) with the use of the broadcasting services bands. Radio LAPs prescribe detailed technical specifications for radio broadcasting services planned for a licence area. For television broadcasting services, a television LAP (TLAP) is less prescriptive than a radio LAP.
5. **TPGs:** The ACMA has made the TPGs under section 33 of the BSA, for the technical planning of individual services that use the broadcasting services bands as a means of delivery. The TPGs set out technical requirements for planning and operating new or existing transmission facilities used to provide broadcasting services in the broadcasting services bands. Compliance with the TPGs is a licence condition under the RA for some TLs. The TPGs are further described in the next section of this paper.
6. **LCD:** The ACMA has made the LCD under subsection 110A(2) of the RA. The LCD determines that TLs that are used to provide broadcasting services are subject to particular licence conditions. These are further described in the next section of this paper.
7. **Transmitter LCD ([Radiocommunications Licence Conditions \(Transmitter Licence\) Determination 2025](#)):** The ACMA has made the Transmitter LCD under subsection 110A(2) of the RA. The Transmitter LCD determines that TLs are subject to conditions relating to the emission of electromagnetic energy (EME). It is not necessary to discuss this instrument further in this consultation process.

8. **TL:** The ACMA issues TLs under section 100 or 102 of the RA. The TL authorises the licensee to operate a radiocommunications transmitter, subject to conditions specified in the RA, in the TL, and in any applicable instrument made under section 110A of the RA (including the LCD). Section 109 of the RA imposes the following conditions on TLs issued to commercial broadcasting licensees and long-term community broadcasting licensees under section 102 of the RA:
- the licensee must not operate a radiocommunications transmitter otherwise than in accordance with any relevant technical specifications determined in a LAP
  - the licensee must comply with the TPGs.

Attachment A is a Framework map that describes in plain English some of the interrelationships between elements 2–6 and 8 of the above summary, and includes short form descriptions of the obligations under those elements. It cannot and should not be considered legal advice or a comprehensive summary of the entire regulatory regime relevant to broadcasting services.

To support the Framework, there are also guidance documents that describe the detailed technical planning of broadcasting services:

- The [Technical Planning Parameters and Methods for Terrestrial Broadcasting \(TPPs\)](#) detail the planning and measurement methods, parameter values and planning assumptions we use for planning analogue broadcasting services.
- [Technical planning handbook](#) sets out the general and technical assumptions for planning digital television services.
- [Broadcast planning instructions](#) which clarify some certain aspects of broadcast planning.

## Scope of potential changes to the Framework

### In scope of consideration for changes

- The TPGs.
- The LCD.
- (Radio) LAP structure and standard content to be included in future LAP variations.

### Out of scope of consideration for changes

- The BSA.
- The RA.
- TLAPs and DRCPs.
- The [Technical Planning Parameters](#) (TPPs) and the other guidance documents.
- The Transmitter LCD.

While a review of some sections in the primary legislation could assist in solving some of the issues raised later in this paper, we cannot review them as part of this consultation. The Department is responsible for managing changes to primary legislation. We will continue to propose areas for practicable amendments, where appropriate. Ultimately, any changes to the primary legislation needs to be passed by Parliament.

Most broadcast planning [priorities](#) are related to analog radio broadcasting services, which are subject to prescriptive technical specifications included in LAPs. While DRCPs are also very prescriptive, we expect less work in the medium term on them than analog radio services. TLAPs are currently less prescriptive than radio LAPs. Consequently, we do not propose to examine changes to the structure of TLAPs or DRCPs.

While we acknowledge that the TPPs no longer fully reflect how we plan analog broadcasting services and that a review could also result in future improved spectrum utility, and that completing a review in parallel with a review of the TPGs would be ideal, we are of the view that it could not be conducted in time to meet the sunseting deadline for the TPGs.

#### Question 1

Do you consider the identified scope of consideration for changes to the Framework appropriate? If not, should it be expanded, and in what ways?

## Brief description of the role of in-scope legislative instruments

### Broadcasting Services (Technical Planning) Guidelines 2017

The TPGs set out technical requirements for planning and operating new or existing transmission facilities used to provide services in the broadcasting services bands.

The TPGs were made under section 33 of the BSA. Section 33 of the BSA provides that the ACMA is to develop written guidelines for the technical planning of individual services that use the broadcasting services bands as a means of delivery.

The RA makes compliance with guidelines developed under section 33 of the BSA a condition for the following TLs issued under the RA:

- TLs issued under section 102 of the RA to commercial or community broadcasting licensees (paragraph 109(1)(e)).
- TLs issued under section 101A of the RA to temporary community broadcasting licensees (paragraph 108A(1)(d)).
- Digital radio multiplex transmitter licences (paragraph 109B(1)(n)).

There is no similar requirement under the BSA or RA for TLs that authorise the operation of transmitters for the provision of national broadcasting services or narrowcasting services. However, subsection 110A(2) of the RA empowers the ACMA to determine by legislative instrument that each apparatus licence included in a specified class of apparatus licences is taken to include one or more specified conditions. The ACMA has made the LCD under subsection 110A(2) of the RA, which imposes conditions on national broadcasting services and narrowcasting services requiring compliance with certain guidelines in the TPGs.

The TPGs prescribe guidelines and are structured as follows:

- Part 1 – Definitions including planned minimum field strengths.
- Part 2 – Start up procedures.
- Part 3 – Coverage and interference guidelines including minimum coverage and overspill criteria.
- Part 4 – Change of transmitter site and technical operating procedures.
- Part 5 – Requirements for broadcasting and datacasting services including maximum field strength and emission requirements.

The [explanatory statement](#) to the TPGs provides further context, but the intent of certain guidelines is worth expansion:

- Guidelines 11 and 12 are minimum coverage criterion, which aim to ensure that a relevant broadcasting service provides sufficient coverage with its licence area.
- Guidelines 13, 14 and 15 are overspill criterion, which aim to ensure that signal levels from a broadcasting service do not provide an effective service in an adjacent licence area which may have services operated by another licensee.
- The TPGs, when read in conjunction with a LAP, TLAP or DRCP relevant for a specific service, provide a defined 'technical envelope' within which relevant licensees must comply with when they plan, make changes to, and operate, their transmission facilities.

## Radiocommunications Licence Conditions (Broadcasting Licence) Determination 2025

The LCD prescribes conditions for specific TLs, namely, those which authorise the operation of a transmitter for the provision of the following services:

- Narrowband area service.
- Narrowcasting service.
- National broadcast service.
- ‘Re-transmission service’ (provided in accordance with section 212 of the BSA).
- Community broadcasting service provided under a TCBL.

The LCD was made under subsection 110A(2) of the RA that provides the ACMA with an ability to determine common conditions for specified classes of apparatus licences. The LCD prescribes conditions relevant to TLs authorised to operate in the broadcasting services bands, and is relevantly<sup>1</sup> structured as follows:

- Part 1 – Definitions including licence classes covered by the LCD and planned minimum field strengths.
- Part 2 – Conditions for TLs for national broadcasting services, including conditions about start up advertising, operating requirements, interference management, and emission requirements by reference to the TPGs.
- Part 3 – Conditions for TLs for narrowcasting services, including conditions about start up advertising, operating requirements, interference management, and emission requirements by reference to the TPGs.
- Part 5 – Conditions for TLs issued to holders of TCBLs, including conditions about interference management.
- Part 6 – Conditions for TLs issued to persons relying on section 212 of the BSA, including conditions about start up advertising, re-transmit limitations, interference management and emission requirements by reference to the TPGs.

The [explanatory statement](#) to the LCD provides further context.

The LCD, when read in conjunction with any relevant LAP, TLAP or DRCP that applies to a specific service, the RA, the Transmitter LCD and any conditions include on a TL, provide the complete licence conditions for that TL.

### Radio licence area plans

The ACMA is given the power to prepare LAPs under section 26 of the BSA. A radio LAP prescribes the areas relevant broadcasting services are licensed to serve, and the technical specifications that apply to the provision of those services. National, commercial and long-term community radio broadcasting services, and most HPON services, are planned in radio LAPs. LPON services, community broadcasting services provided under TCBLs, and services provided in reliance on section 212 of the BSA are not typically planned in radio LAPs.

A radio LAP typically has the following structure:

- A ‘determination’ of the number and type of broadcasting services to be available in each licence area described in the LAP.

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<sup>1</sup> Note that Part 4 of the LCD concerns narrowband area services, which are only authorised to operate outside the broadcasting services bands.

- For each licence area in the LAP, a schedule which sets out the broad details of services to be available for the licence area by reference to the transmitters to be used for the provision of each such service.
- For each licence area in the LAP, an attachment that defines the geographic extent of the licence area, generally using areas defined by the Australian Bureau of Statistics in past Censuses, such as Local Government Areas, Collection Districts, and Statistical Local Areas.
- For each transmitter mentioned in a schedule and attachment that prescribes the technical specifications for the transmitter.

The following technical specifications are determined for each transmitter for a service planned in a radio LAP:

- a) the category of the relevant service (national, commercial, community, or open narrowcasting)
- b) the general area served by the transmitter
- c) the service licence number (for commercial and community broadcasting services only) and the specification number for the transmitter
- d) a description, and geographic coordinates, of the location (***nominal location***) from where the radiocommunications transmitter must be operated
- e) the frequency on which the transmitter must be operated
- f) the frequency band containing that frequency, and the mode of transmission the transmitter must use
- g) the required polarisation of the transmission made by the transmitter (for FM services);
- h) the maximum antenna height for the transmitter
- i) the maximum ERP or CMF, in each specified direction, of transmissions made by the transmitter
- j) any special conditions that apply to the operation of the transmitter
- k) any circumstances that must exist for the transmitter to be able to be operated, or that prohibit the transmitter from being operated.

It can be useful to contrast a radio LAP with a TLAP. A TLAP:

- does not specify a site location
- does not specify maximum antenna height
- specifies a maximum ERP but not for each specific direction
- indicates an associated technical specification number for information only
- has a mechanism for when an ERP can exceed the specified maximum ERP.

While radio markets may justify more complex technical specifications in LAPs to manage overspill into other markets, and that television markets and planning of services for digital television are somewhat different, there is, nonetheless, a higher degree of flexibility given to the planning of television services.

# Observed issues with the Framework

## Observed issues

### General observations

The ACMA considers that the TPGs are operating effectively and efficiently, but that they could benefit from some updating. This is largely because the TPGs, and the wider Framework, contain several obligations that, in our view, may unduly constrain licensees and the ACMA in planning broadcasting services expeditiously. They may also unnecessarily place administrative burdens on both the ACMA and licensees to plan or make changes to services to fully comply with the existing Framework.

Further, there are guidelines in the TPGs covering similar issues as those addressed in sections of the LCD, which are also applicable to certain broadcasting services. There is then scope to consider either alignment of those similar provisions across both instruments or consolidating those similar provisions to be instead contained wholly within the LCD, with as common as possible clauses applying to all relevant broadcast service types.

These issues are described below.

### Frequency of LAP variations for minor changes and long regulatory forbearance

Many requests to change technical characteristics of radio services, despite assessment indicating no significant effect on spectrum utility, effective coverage, interference to other services or increased overspill into other markets, require variation to LAPs and (subject to ACMA agreement) potentially long periods of regulatory forbearance ahead of the LAP variation work commencing and coming into effect. This creates a significant administrative burden on both licensees and the ACMA. Modifying the Framework to reduce the number of scenarios that necessitate LAP variations and/or regulatory forbearance would reduce this burden and allow the ACMA to complete more broadcast planning tasks. This could be achieved in several ways but is likely to require changes to existing radio LAPs, as well as the TPGs.

The range of proposed changes to technical characteristics of the kind described includes actual or relocated antennas to a height greater than the maximum antenna height specified in the LAP, antenna changes that result in the maximum ERP not meeting the relevant TPG minimum coverage criterion, and site changes that result in small exceedances of the LAP maximum ERP or small increases in overspill that would fail the current relevant TPG overspill criterion.

### No specific provision for alternative or disaster recovery transmissions

There are occasions where broadcasters have to cease transmission, or change the operation of their transmitters, because of circumstances outside their control. For example, a transmitter or antenna might be damaged, or access to the transmitter might be difficult because of a natural disaster. A broadcaster in such a case may have to cease their normal transmission, and then make provision for alternative arrangements through planned redundant standby infrastructure, or through a temporary transmitter at a different location.

The current Framework has no provision to deal with 'standby' or 'disaster recovery' transmissions that do not comply with the Framework. Again, regulatory forbearance is generally required to facilitate these transmissions. Introducing provisions into the

Framework to better enable these kinds of transmissions may remove the need for forbearance and provide better guidance to licensees.

The parts of the TPGs that do not readily accommodate these types of transmissions include:

- Part 2 – Start up procedures.
- Guidelines 11 and 12, Part 3 – Coverage and interference (the minimum coverage criteria).
- Part 4 – Change of transmitter site and technical operating specifications procedure.

### **Disparity between similar areas in the TPGs and LCD**

There are guidelines in the TPGs and sections in the LCD that deal with similar issues. However, not all broadcasting services are subject to the TPGs and not all TLs are subject to the LCD. Alignment of these provisions, or consolidating them into the LCD, would increase clarity and potentially make it easier for licensees to know the obligations to which they are subject.

There are also guidelines in the TPGs that may warrant application to a broader class of broadcasting services, such as those guidelines relating to change of transmitter site.

Specifically, we are of the view that there may be benefit in moving the following areas of the TPGs to the LCD and to expand the scope of the LCD as follows:

1. Part 2 of the TPGs (dealing with start up procedures) could be consolidated with section 8 (and similar sections for other service types) of the LCD (a condition applying before commencement of a service).
2. Guideline 16 of the TPGs (dealing with interference to broadcasting services and datacasting services) and Guideline 17 (dealing with Interference to other radiocommunications) could be consolidated with section 10 (and similar sections for other service types) of the LCD (a condition about harmful interference).
3. Part 4 of the TPGs (about change of transmitter site and technical operating specifications procedures) could be placed in the LCD to expand its scope.
4. Part 5 of the TPGs (about requirements for broadcasting and datacasting services) could be placed in the LCD and expanded in its application.
5. The LCD could be amended to include sections on commercial and community broadcasting services, as the legislative framework now supports the ability for an LCD to apply to RA section 102 licences, which it did not before 2021.

### **Application of the minimum coverage criteria**

The TPGs include provisions that specify 'minimum coverage criteria' to be met by relevant broadcasting services. Broadly speaking, this criteria requires either the power at which a transmitter is operated to be sufficiently close to that specified for the transmitter in the LAP, or where the transmitter is not located at the site specified in the LAP, to provide suitable coverage to the same urban centres that it would if it did operate at the site specified in the LAP.

Each criterion is a hard limit. The minimum coverage criteria were derived from 'Minimum level of service requirements' in the earlier [Broadcasting Services \(Technical Planning\) Guidelines 2007](#), which did have notes indicating discretion in relation to the minimum power of a service.



While parts of the Framework treat long-term community broadcasting licences differently than TCBLs, they must both comply with the TPGs. There would be benefit in considering whether long-term community broadcasting licences and TCBLs should be obliged to comply with the minimum coverage criterion as it would provide more flexibility for those services that are community funded and operated.

Similarly, it may be appropriate to review whether the minimum coverage criteria are still useful for high power open narrowcasting (HPON) services under the LCD and, perhaps, commercial radio broadcasting services. While the allocation of these services in a licence area is limited and there is a natural public interest in ensuring that these services cover as much of the licence area as possible, these are services subject to commercial decision making and would likely want the flexibility in that decision making. National services, also with a high public interest in wide coverage, have no such equivalent obligation.

Specifically, the following provisions in the TPGs may benefit from a review:

1. Guideline 11 – Minimum coverage criterion – transmitter located at the nominal location.
2. Guideline 12 – Minimum coverage criterion – transmitter not located at the nominal location.

## **Application of the overspill criteria**

The TPGs include provisions that specify 'overspill criteria' to be met by relevant broadcasting services. Broadly speaking, these criteria require, when a transmitter is not at the nominal location specified in the LAP or where no nominal location has been specified in the LAP, a quantitative pass/fail assessment of whether a service's overspill into another licence area is acceptable or not.

Introducing an aspect of qualitative assessment into the criteria, or a means of considering exemptions, would give some flexibility when making assessments and reduce the need for regulatory forbearance and LAP variations in cases where ACMA staff would otherwise find overspill acceptable from an engineering planning perspective, but would not have met the existing overspill criteria.

Specifically, the following provisions in the TPGs may benefit from a review:

1. Guideline 13 – Overspill criterion – transmitter not located at the nominal location.
2. Guideline 14 – Overspill criterion – transmitter with no nominal location specified.

Also, to be able to introduce some flexibility in maximum antenna height and maximum ERP in radio LAPs, discussed later, would likely require the introduction of a new guideline – Overspill criterion – transmitter located at the nominal location, to provide a guideline to be able to consider cases where the maximum antenna height or maximum ERP is exceeded when the transmitter is at the nominal LAP site.

## **General improvement of clarity**

We have also identified various guidelines in the TPGs which would benefit from clarification. These improvements include:

1. Improved overall guidance to describe what the intent of each Part is.
2. Section 5 – Application. Explicitly listing the relevant broadcasting services the TPGs apply to.
3. Section 6 – Interpretation. Improvements to some definitions.
4. Subguideline 11(2). To better explain the application of the minimum coverage criteria.
5. Guideline 19. To better explain what calculations are expected when there is to be a change in transmitter location or technical operating specifications.

Specific examples are discussed later in this paper, but include updating some definitions, deleting irrelevant parts of definitions, adding explanatory detail, being clearer about intent, using plain English where possible, and aligning language better with definitions in other instruments.

### **Question 2**

What are your views on the observed issues with the Framework, and do you consider other issues should be addressed?

### **Question 3**

Do you believe there is benefit in reviewing the minimum coverage criteria? If so, what are those benefits?

## **Specific scenarios not well accommodated by the Framework**

To better illustrate the above issues, some specific scenarios are discussed.

### **Scenario 1: Enforced site relocation**

A community radio broadcasting licensee is forced to change site due to lease issues but is comfortable with the coverage the new site will provide to its target audience. ACMA assessment indicates that the site change will not cause interference to other services, will not cause significant overspill, and will provide a service to the community the licensee is licensed to serve. The licensee cannot operate a transmitter at the new site unless the new site provides the same coverage level as the old site did to the same urban centres served by the old site (in accordance with guidelines 12 and 13 of the TPGs). If it does not, the ACMA will first need to vary the LAP, which takes considerable time and resources.

### **Scenario 2: Disaster recovery transmissions**

A commercial radio broadcasting licensee wants to establish a temporary low power transmission at a different location due to catastrophic failure of the normal transmitter following a recent, but no longer ongoing, natural disaster. However, the licensee must comply with the full start up provisions and minimum coverage criteria in the TPGs (Parts 2 and 3). Both may not be practicable to comply with for a temporary transmission that is also desired to be established quickly.

### **Scenario 3: Standby infrastructure transmissions**

A commercial radio broadcasting licensee wants to deploy a standby antenna and/or transmitter to provide redundancy when the main antenna fails, but at a lower ERP than the main antenna and/or transmitter. However, the licensee must comply with start up provisions the first time the standby antenna or transmitter is used, and the transmission must comply with the minimum coverage criteria in the TPGs (Parts 2 and 3). Given that the purpose of secondary transmitter is to operate at lower power on an occasional standby basis, these requirements are not likely to be met.

### **Scenario 4: Antenna height change**

A commercial radio broadcasting licensee may identify a long-standing discrepancy where the height of the installed antenna is a couple of metres above the maximum antenna height specified in the LAP. The ACMA agrees that this does not affect spectrum utility or create unacceptably increased overspill. Nonetheless, the licensee is not complying with the technical specification in the LAP or, if the site is not at the nominal LAP site, potentially the overspill criterion. Notwithstanding the absence of any effect on spectrum utility, to regularise the situation, either the antenna must be lowered or the LAP varied. A LAP variation often takes considerable time to be assessed and implemented, even where the change does not have significant consequences for spectrum management.

### **Scenario 5: Small maximum ERP exceedance**

A community radio broadcasting licensee is trying to design an antenna system to meet the ERP mask specified in the relevant LAP, and cannot find a design to do so, at most exceeding parts of the mask by 1 dB. The ACMA considers that this does not significantly affect spectrum utility or create unacceptably increased overspill. However, unless the LAP is varied, the licensee cannot use the mask without contravening the technical specifications or if the site is not at the nominal site, potentially the relevant overspill criterion. Notwithstanding the inconsequential effect on spectrum utility, a LAP variation often takes considerable time to be assessed and implemented.

#### **Question 4**

What other relatively frequent scenarios have issues that should be addressed? Give specific examples.

### **Expected limitations to reform**

We have reviewed the Framework and have initial proposals on what might be possible for each guideline in the TPGs and other parts of the Framework. However, it may be the case that some proposals cannot be implemented within the Framework.

# Desired in-principle changes to the legislative instrument/s

This section examines the TPGs, LCD and a radio LAP to indicate preliminary views and proposes possible changes to the framework for initial discussion. After feedback from this consultation, different solutions to solve the identified issues may be found when drafting potential new instruments.

## In the TPGs

### TPGs ready-reckoner

The following ready-reckoner in Table 1 for the TPGs will assist with understanding Table 2.

**Table 1: TPGs ready-reckoner**

| TPG part                           | Relevant TPG guidelines                                                                                                                                                                                                                    |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Part 1 – Preliminary               | 5 Application<br>6 Interpretation including definitions<br>8 Site tolerance                                                                                                                                                                |
| Part 2 – Start up procedures       | 9 Application of Part 2<br>10 Start up procedures                                                                                                                                                                                          |
| Part 3 – Coverage and interference | 11 Minimum coverage criterion – transmitter located at the nominal location<br>12 Minimum coverage criterion – transmitter not located at the nominal location<br>13 Overspill criterion – transmitter not located at the nominal location |

| TPG part                                                                             | Relevant TPG guidelines                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                      | <p>14 Overspill criterion – transmitter with no nominal location specified</p> <p>15 Overspill criterion – datacasting services</p> <p>16 Interference to other services – broadcasting services and datacasting services</p> <p>17 Interference to other services – radiocommunications</p> |
| Part 4 – Change of transmitter site and technical operating specifications procedure | <p>18 Application of Part 4</p> <p>19 Change of transmitter site and technical operating specifications procedure</p>                                                                                                                                                                        |
| Part 5 – Requirements for broadcasting and datacasting services                      | <p>20 Application of Part 5</p> <p>21 Maximum field strength within the licence area</p> <p>22 Radiated signal characteristics</p>                                                                                                                                                           |

Table 2 proposes and discusses possible changes to specific guidelines of the TPGs.

**Table 2: Possible changes to the TPGs**

| Relevant TPG guideline    | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Beginning of each Part    | We propose to improve the clarity of the intent and scope of the TPGs, by introducing new elements to the structure of the TPGs to include improved descriptions of each Part in a similar way to the <a href="#">Radiocommunications Equipment (General) Rules 2021</a> . That instrument has <i>Simplified outline of this Part</i> sections to provide guidance and clarity of intent for each Part.                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Part 1 – 5 Application    | We propose to expand the note to clearly identify what services the RA paragraphs refer to: <ul style="list-style-type: none"> <li>• 108A(1)(d) – (that paragraph refers to) TCBLs.</li> <li>• 109(1)(e) – commercial and community broadcasting licensees.</li> <li>• 109A(1)(f) – no longer applicable as removed from the RA, so this reference can be removed from the TPGs.</li> <li>• 109B(1)(n) – digital radio multiplex transmitter licensees.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                            |
| Part 1 – 6 Interpretation | <p>We propose a general review for improvements in clarity and alignment with other possible changes in other instruments, as is normal when remaking instruments. Guideline 6 is otherwise considered fit for purpose. We may revise the definition of urban centre (An Australian Bureau of Statistics (ABS) geographic data product) and the Census (year) to be used, dependent upon other proposed changes.</p> <p>In conjunction with a review of guideline 19 we propose to consider revising the term ‘EMC Calculations’ to either ‘Intermodulation calculations’ or ‘site compatibility calculations’. This is because the term <a href="#">EMC</a> (electromagnetic compatibility) is generally understood to be related to a different type of device compatibility, which broadcasting transmitters also have to comply with.</p> |
| Part 1 – 8 Site tolerance | Recent radio LAPs contain wording that allows a transmitter to operate from a site other than the nominal site in the LAP if the TPGs are otherwise met. Many existing LAPs don’t have this clause, as it is being introduced as an update as and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Relevant TPG guideline       | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | <p>when LAPs are varied with other proposed changes. We propose to provide a clarifying note to indicate this to avoid confusion.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Part 2 – Start up procedures | <p>We propose simplifying the start up procedures and making them more outcomes focussed. Currently, Part 2 focuses on test transmissions and how they are communicated, administered and conducted, and the duration of transmissions, rather than their impact.</p> <p>We also propose, for clarity, to align these requirements with similar clauses for other service types covered by the LCD, including potentially moving these guidelines from the TPGs to the LCD.</p> <p>In the TPGs, there are requirements relating to test transmissions, whereas the LCD focuses on promotion of the new service and notification to the audience. We would propose making the procedures common across services, considering the different needs of different types of technologies and audiences.</p> <p>The simplifications could also better accommodate different requirements for emergency/disaster recovery transmissions where lengthy start up periods may not be beneficial.</p> <p>Our preliminary views are that:</p> <ul style="list-style-type: none"> <li>• Requirements of section 8 of the LCD (Condition – person to advertise before commencing service, for National broadcasting services) are sufficient if applied to relevant services under the TPGs.</li> <li>• Emergency/disaster recovery transmissions need no test transmission period but should be appropriately advertised.</li> </ul> <p>If we do decide to retain start up procedures in the TPGs, rather than move to the LCD, we would consider further changes to guideline 10 of the TPGs. For instance:</p> <ul style="list-style-type: none"> <li>• Paragraph 10(f) related to maintaining operating specifications during the test period – whether to retain this in its current form or provide more flexibility during the period to depart from the operating specifications.</li> <li>• Paragraphs 10(g), (h) and (i) related to interference resolution – whether to retain these in their current form or to combine (g) and (h) while maintaining the intent of both, and to consider revising (i) so that reports are only required to</li> </ul> |



| Relevant TPG guideline                                                   | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                          | <p>be prepared when the ACMA requests them. Currently, they must always be prepared, but only provided to the ACMA upon request.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>In Part 3 and Part 5 –<br/>Guideline 13 (2),<br/>Guideline 21 (4)</p> | <p>We propose to revise Census/Population related definitions. Sections of the operation of Part 3 and Part 5 rely on population figures being specified or determined. While subguideline 21(4) in Part 5 provides guidance in determining population figures for that guideline, there is no similar guidance in Part 3.</p> <p>We propose improving the guidance for population determination in subguideline 21(4) and introducing new population guidance for Part 3. This would specify the appropriate Census to be used for each guideline. For some guidelines, using the latest Census for population figures will be appropriate, e.g. for new or varied services, so we would propose to keep the TPGs up to date via amendment when new Census populations are available.</p>                                                                                                                                                                                                                                                                                                                                                                         |
| <p>Part 3 – Guideline 11 and 12:<br/>Minimum coverage criteria</p>       | <p>Guidelines 11 and 12 in Part 3 concern minimum coverage criteria. These guidelines may not be practicably met by lower power transmissions which are often used by disaster recovery or standby facilities, either at the nominal location specified in the LAP or at another site. We propose that there should be a mechanism to authorise such transmissions without the need for regulatory forbearance.</p> <p>Possible use cases include:</p> <ul style="list-style-type: none"> <li>a) Supporting disaster recovery transmissions from existing sites or other sites that would not meet the relevant minimum coverage criterion.</li> <li>b) Supporting standby transmission equipment, used when the primary systems develop a fault, that would not meet the relevant minimum coverage criterion.</li> </ul> <p>There is already potential for a certain degree of flexibility in such cases. It may be possible to extend the mechanism in subguideline 11(2) to all the criterion. The intent of subguideline 11(2) is that if the ACMA agrees to a technical specification in a relevant TL, then we have agreed to depart from the criterion.</p> |

| Relevant TPG guideline                                                           | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                  | <p>Another possible alternative solution could be to draft formal exemption clauses in the LCD, but this would likely require moving the relevant guidelines to the LCD.</p> <p>If the minimum coverage criterion were no longer a requirement of the TPGs, then this issue would cease.</p> <p>It is also likely that aspects of Part 2 are not practicable for these use cases, such as length of advertisement, would need to be changed to support these use cases, and this is discussed earlier in row 5 of this table.</p>                                                                                                                                                                                                                                                                                                                         |
| Part 3 – 11 Minimum coverage criterion at nominal location                       | <p>We propose to clarify subguideline 11(2) to ensure that licences can depart from the minimum coverage criterion when we so agree. That is the intent of the reference to ‘in the transmitter licence’. i.e. if we issue a TL where the technical specification would not meet the minimum coverage criterion, it is to be taken that we have agreed to depart from the criterion in that particular case.</p> <p>As discussed earlier in the section about the review of minimum coverage criteria, there may also be general use cases where the minimum coverage criteria should not necessarily apply. We have the view that we should be more flexible, especially for TCBLs, and potentially all services currently subject to this guideline.</p> <p>This guideline would be removed if we propose to remove the minimum coverage criterion.</p> |
| Part 3 – 12 Minimum coverage criterion – transmitter not at the nominal location | <p>We propose to include a mechanism where licences can depart from the minimum coverage criterion when we issue a TL that does not comply with the criterion. If possible, this could be done in a similar manner to that proposed for subguideline 11(2).</p> <p>There may be use cases where the minimum coverage criterion should not necessarily apply, as discussed previously in the section about the review of the minimum coverage criteria.</p> <p>There is also an issue with the application of guideline 12, which currently relies on the use of ABS Urban Centres (one type of ABS geographies that can be used to represent urban areas) for assessment, which can be very large. For</p>                                                                                                                                                |

| Relevant TPG guideline              | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | <p>example, the whole of greater Sydney is one urban centre. For licence areas smaller than the relevant urban centre, it makes assessment largely impracticable.</p> <p>We would propose to consider using a different ABS Structure (specific geographies that the ABS releases population statistics for) under the <a href="#">Australian Statistical Geography Standard</a>. The size of the Structure should be matched to make the assessment practicable, perhaps to suburbs or postal areas. Local Government Areas (LGAs) may be too large in rural and remote areas. It may be preferable to use an ABS rather than non-ABS structure, so an ABS Structure such as Mesh Blocks (MBs) or Statistical Areas Level 1 (SA1s) may be appropriate to assess whether a transmitter not at the nominal site still covers the population areas it would if it were at the nominal site. We welcome views on appropriate Structures to use but noting that this guideline would be removed if we propose to remove all minimum coverage criterion.</p>                                    |
| Part 3 – 13, 14 Overspill criterion | <p>Guidelines 13 and 14 rely in part on assessing whether signal levels exceed a service's planned minimum field strength (the minimum median field strength planned for a service for which protection against interference may be afforded). This may be the nominal value specified in Part 1- 6 of the TPGs but may also be specified to be a higher figure in an interference limited environment.</p> <p>Sometimes, however, the higher value may have been inadvertently not indicated in the TL that authorises the operation of the transmitter. In these cases, with evidence, it may be reasonable to allow an exemption to the overspill criterion, then place an advisory note on the TL that indicates the minimum planned field strength used for planning of the service.</p> <p>This could likely be achieved in a similar manner as discussed in row 9, include a mechanism where licences can depart from the relevant overspill criterion when we issue a TL that does not comply with the criterion, in a similar manner to that proposed for subguideline 11(2).</p> |

| Relevant TPG guideline                                                                      | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Part 3 – 13, 14. Overspill criterion                                                        | <p>We propose to consider revising this overspill criterion to introduce some qualitative flexibility, or introducing a means to consider exemptions, together with the introduction of a new criterion for when the site is at the nominal LAP location. These proposals may usefully reduce the frequency of the use of regulatory forbearance and the number of LAP variations.</p> <p>As discussed later in the section on possible LAP changes, to fully consider the possible introduction of some flexibility in maximum antenna height and maximum ERP, we would likely need to introduce a new guideline related to assessing overspill when a transmitter is located at the nominal site, so consideration of maximum antenna height and maximum ERP exceedances in all cases can be assessed.</p> <p>Our view is that any changes to overspill guidelines should, if possible, use a qualitative assessment, as having a single pass/fail quantitative figure for overspill is likely to be too constrained for the range of cases that may need to be considered. While the ACMA performs compliance checks against the TPGs, the TPGs are for licensees to comply with. Consequently, it may prove difficult to develop successful qualitative guidelines, but we do want to seek views.</p> <p>Alternatively, introducing an ability for the ACMA to, as discussed in row 7, to extend the mechanism in subguideline 11(2) to the overspill criteria as well. As per that discussion, the intent of subguideline 11(2) is that if the ACMA agrees to a technical specification in a relevant TL, then we have agreed to depart from the criterion.</p> |
| 11.Part 3 – 14. Overspill criterion – transmitter with no nominal location specified        | Guideline 14 also relies in part on an assessment related to Urban Centres. Consequently, similar changes to those discussed in row 9 in relation to guideline 12 would likely be appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Part 3 – 16 Interference to other services – broadcasting services and datacasting services | <p>We are considering the benefits of aligning guideline 16 with similar sections in the LCD, such as subsection 10(1) (for national broadcasting services, conditions – harmful interference, operation in the broadcasting services bands). We could potentially expand the scope of the LCD and remove this guideline from the TPGs.</p> <p>Subsection 10(1) of the LCD has less explicit obligations upon a licensee compared to guideline 16 as it does not mention fitting devices to resolve interference at the licensee's expense. Our view is that such an explicit requirement is useful for</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Relevant TPG guideline                                           | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                  | <p>broadcasting services given the typical interference situations that occur and that would be normal practice for broadcasters when resolving interference. Note that paragraph 110(b) of the RA allows the ACMA to impose a similar condition that applies to all potentially affected radiocommunications.</p> <p>Other licences subject to the LCD have similar conditions to subsection 10(1).</p> <p>Any consolidation of interference-related clauses will need to retain clarity on the relevant geographic area type definitions to be protected from interference for each broadcasting service type. Different broadcasting service types have different area definitions for which they are to be protected from interference.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Part 3 – 17 Interference to other services – radiocommunications | <p>We are considering the benefits of aligning guideline 17 with similar sections in the LCD, such as subsection 10(2) (for National broadcasting services, conditions – harmful interference, operation outside the broadcasting services bands). We could potentially expand the scope of the LCD and remove this guideline from the TPGs.</p> <p>Subsection 10(2) of the LCD has different obligations compared to guideline 17. Subsection 10(2) of the LCD only requires interference avoidance to already established radiocommunications transmitters, where guideline 17 effectively applies to established and future radiocommunications.</p> <p>Our view is that broadcasters should only be obligated to prevent harmful interference to an existing radiocommunications service in a similar manner to subsection 10(2) of the LCD, assuming broadcasting transmitters are operating to all relevant standards and specifications. Due to the often high-power nature of broadcasting transmitters, it is unreasonable to avoid interference entirely to new radiocommunications services that may be established after the broadcasting service has begun transmitting. We propose extending such a condition to as many broadcasting services as practicable.</p> <p>Subsection 10(2) of the LCD, and other relevant sections where similar for other TLs, may warrant a review as it may be impractical and not reasonable to prevent interference to existing transmitters operating under a class licence.</p> <p>Other service types subject to the LCD have similar conditions to subsection 10(2) of the LCD.</p> |

| Relevant TPG guideline                                                               | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Part 4 - Change of transmitter site and technical operating specifications procedure | <p>Apart from proposing a new term for EMC calculations as discussed in row 3 of this table, we propose providing more guidance on what forms of calculations should be conducted, either in this part or in the definition of EMC calculations in the Part 1 – Preliminary definitions.</p> <p>The explanatory statement to the TPGs states, in part:</p> <p><i>The calculations must take into account possible interference occurrences due to intermodulation, harmonic products, local oscillator radiation and co-channel and adjacent channel services.</i></p> <p>Consequently, we propose providing a similar clarification within the body of the TPGs. We note the following:</p> <ul style="list-style-type: none"> <li>• Assessing potential local oscillator interference would be a component of assessing spurious emissions overall.</li> <li>• There should not be any co-channel relationships between broadcasting and radiocommunications services.</li> <li>• There should not be any adjacent 'channel' relationships between broadcasting and radiocommunications services, but out-of-band emissions assessment would be appropriate.</li> <li>• Co-site assessments for overload, out-of-band and spurious mechanisms are appropriate.</li> </ul> <p>An option for improvement could be relocating procedures relating to EMC calculations to the LCD, and then applying such procedures to a wider range of broadcasting licence classes.</p> |
| Part 5 – 21 Maximum field strength                                                   | <p>Maximum field strength is a condition for those TLs in the LCD that reference guideline 21 of the TPGs as a condition. We propose moving these requirements to the LCD and amending the LCD as appropriate.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

**Question 5**

Do you think the TPGs or any other part of the Framework would benefit from further clarity? Which areas would benefit from further clarity? What have you found unclear and how has this affected you?

**Question 6**

What are your views on use cases for exemptions to minimum coverage criteria to support emergency and standby transmissions? Should any other cases be considered? What are your views on the proposals to change the minimum coverage criteria and the potential other ways to change its application canvassed by the ACMA? Do you have any other views on the application of, and the need for, the minimum coverage criteria?

**Question 7**

Do you think proposed changes to the overspill criteria, including the introduction of a possible new criterion (relating to assessing overspill at nominal sites), would be beneficial and would you agree with the introduction of such a new criterion? Under what use cases would you see the possible new criterion, aimed at increasing flexibility, being used?

**Question 8**

Do you see benefit in the alignment of start up procedures between the TPGs and the LCD?

**Question 9**

Do you see benefit in the alignment of interference management procedures between the TPGs and the LCD?

## In the LCD

### LCD ready-reckoner

The following ready-reckoner in table 3 for the LCD will assist with understanding table 4.

**Table 3: LCD ready-reckoner**

| LCD part                                                                    | Relevant LCD sections                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Part 2 Conditions –<br>broadcasting licence (national<br>broadcast service) | 8 Condition – person to advertise before commencing service<br>10 Conditions – harmful interference<br>11 Condition – emission requirements                                                                                                                                                                                                                                                                                                                                                                                                           |
| Part 3 Conditions –<br>broadcasting licence<br>(narrowcasting service)      | 13 Condition – person to advertise before commencing service<br>14 Conditions – operating requirements for narrowcasting service station<br>15 Conditions – additional operating requirements for narrowcasting service station in the AM radio band<br>16 Condition – additional operating requirements for narrowcasting service station in the FM radio band<br>17 Condition – additional operating requirements for narrowcasting service station in the TV bands<br>21 Conditions – harmful interference<br>22 Condition – emission requirements |
| Part 4 Conditions –<br>broadcasting licence<br>(narrowband area service)    | 24 Condition – person to advertise before commencing service<br>27 Conditions – harmful interference                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Part 5 Condition –<br>broadcasting licence                                  | 29 Condition – harmful interference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |



| LCD part                                                                 | Relevant LCD sections                                                                                                                       |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| (temporary community broadcasting service)                               |                                                                                                                                             |
| Part 6 Conditions –<br>broadcasting licence<br>(re-transmission service) | 31 Condition – person to advertise before commencing service<br>33 Condition – harmful interference<br>34 Condition – emission requirements |

Table 4 proposes and discusses possible changes to specific clauses of the LCD.

**Table 4: Possible changes to the LCD**

| Relevant LCD clauses                                                                                                                               | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Part 2 – sections 8, 10, 11<br>Part 3 – sections 13, 14, 21, 22<br>Part 4 – sections 24, 27<br>Part 5 – section 29<br>Part 6 – sections 31, 33, 34 | <p>We propose to consider expanding the LCD to include sections on commercial and community broadcasting services, and to make as many conditions in the LCD as common to as many service types as practicable. Consequently, it may then be practicable to move most of the guidelines from the TPGs to the LCD.</p> <p>The intent would be to have common licence conditions in the LCD applying to as many service types as practicable, and then only guidelines related to service planning remaining in the TPGs.</p> <p>This would include, potentially:</p> <ul style="list-style-type: none"> <li>• Removing Part 2, guidelines 16 and 17 of Part 3, Part 4 and Part 5 from the TPGs</li> <li>• Expanding the scope of the LCD to include commercial and community broadcasting services</li> <li>• Potentially expanding the scope of Parts 2, 3, 4 and 5 of the LCD to have common conditions across service types.</li> </ul> |

| Relevant LCD clauses | Indicative proposal and discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <p>Under this proposal, the TPGs would then only retain Part 3 – Coverage and interference, guidelines 11 – 15. If it was proposed to remove all minimum coverage criterion, then only guidelines 13–15 would remain in the TPGs.</p> <p>The scope of LCD Parts 2, 3, 4, 5 and 6 would be expanded and, depending on views received, some sections revised where there was previous overlap with the TPGs, for example:</p> <ul style="list-style-type: none"> <li>• Sections 8, 13, Use of 'start up procedures' in section 14, section 24, section 31 to accommodate Part 2 of the TPGs</li> <li>• Sections 10, 21, 27, 29, and 33, to accommodate guidelines 16 and 17 of the TPGs.</li> <li>• Sections 11, 22 and 29, to accommodate Part 5 of the TPGs.</li> </ul> <p>If we chose to align conditions for services as much as practicable, then:</p> <ul style="list-style-type: none"> <li>• A new subsection could be added to LCD part 4 to introduce conditions for emission requirements</li> <li>• New subsections could be added to LCD part 5 to introduce conditions for startup and emission requirements.</li> </ul> <p>A new section related to Change of transmitter site and technical operating specifications procedure, could be introduced to the LCD to accommodate Part 4 of the TPGs.</p> |

**Question 10**

Would you see benefit in any parts of the TPGs being moved to the LCD as proposed? What parts and what benefits would this bring? If these parts were moved, do you think these conditions should apply to a broader set of broadcasting service classes than they do now, or even be standardised across broadcasting services?

## In radio LAPs

For radio LAPs<sup>2</sup>, we would like to introduce mechanisms to improve flexibility and allow broadcast TL to depart from LAP technical specifications when we assess they still meet the objects of the BSA, RA and are assessed as not significantly affecting the interference environment. In particular, the suggested approach below is intended to address the issues identified around antenna height and small ERP mask exceedances.

As noted previously, TLAPs are less constrained than radio LAPs and, while we note TLAPs are subject to different statutory requirements under subsection 26(1B) of the BSA, than radio LAPs under subsection 26(1), and therefore we may not be able to fully align the approach the ACMA takes with TLAPs to radio LAPs, we see benefit in introducing further flexibility, where possible, to reduce LAP variations.

We see that introducing flexibility to maximum antenna height and ERP could be achieved by taking a similar approach as we have done in recently amended radio LAPs to nominal location. That is, for nominal location, typical example clauses in recently amended radio LAPs have been:

- (9) Each Attachment, other than an attachment that describes an area within which broadcasting services are to be available, determines the following technical specifications for a radiocommunications transmitter specified in a Schedule:
  - (a) subject to clause (10), a description, and geographic coordinates, of the location (***nominal location***) from where the radiocommunications transmitter must be operated;
  - (b) the frequency on which the transmitter must be operated;
  - (c) the frequency band containing that frequency, and the mode of transmission the transmitter must use;
  - (d) the required polarisation of the transmission made by the transmitter;
  - (e) the maximum antenna height for the transmitter;
  - (f) the maximum effective radiated power (***ERP***) or cymomotive force (***CMF***), in each specified direction, of transmissions made by the transmitter;
  - (g) any special conditions that apply to the operation of the transmitter;
  - (h) any circumstances that must exist for the transmitter to be able to be operated, or that prohibit the transmitter from being operated.
- (10) A radiocommunications transmitter may be operated from a site other than a nominal location (***alternative site***) if the operation from the alternative site complies with any requirements set out for the transmitter and for the operation of the transmitter in guidelines made under section 33 of the Act in relation to operation from an alternative site.

Note: Guidelines under section 33 of the *Broadcasting Services Act 1992* are available, free of charge, from the Federal Register of Legislation at [www.legislation.gov.au](http://www.legislation.gov.au). At the time this clause commenced, the *Broadcasting Services (Technical Planning) Guidelines 2017* were the guidelines in force under section 33.

New clauses could be introduced, like clause 10 above, that clarify the use of maximum antenna height and maximum ERP/CMF and provide direction that where these are exceeded relevant TPGs must still be complied with. Other consequential changes to clause 9 above and relevant attachments may be required to support such an approach.

These potential changes in radio LAPs would be required in order to introduce some flexibility, due to the requirement of paragraph 109(1)(d) of the RA which (effectively)

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<sup>2</sup> A recent example radio LAP is the [Perth radio LAP](#)

requires commercial, community and temporary community services to not operate other than in accordance with the LAP technical specification for the service.

We note that the [Explanatory Memorandum](#) for the Broadcasting Services Bill 1992 refers to the technical specifications being 'nominal'.<sup>3</sup> In the context of broadcast planning, the term 'nominal' suggests the specifications may have been intended to function as planning parameters rather than fixed operating specifications. This may indicate that Parliament originally contemplated some degree of flexibility in applying the specifications contained in a LAP, including specifications such as maximum antenna height and maximum ERP.

To fully consider this, we may need to introduce a new guideline in the TPGs related to *overspill at the nominal site*, so proposed antenna height and ERP exceedances in all cases can have a specified method of assessment. Also, revision of the existing guidelines for overspill criteria would likely be required to support introducing some flexibility to maximum antenna height and maximum ERP in radio LAPs.

**Question 11**

What are your views on introducing flexibility to maximum antenna height and maximum ERP in radio LAPs?

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<sup>3</sup> The notes on what became section 26 of the BSA say: 'The licence area plan will contain the precise details of all licence areas including ... the nominal carrier frequencies ... nominal transmitter sites ... nominal technical conditions for each service, including operating power and radiation pattern ...'

# Implications of possible changes to the technical framework

This section discusses the implications of possible changes to the technical framework and potential ways to mitigate any identified risks.

## **Increasing flexibility of compliance with the TPGs and radio LAPs**

One of our stated aims is to increase the flexibility of the application of the TPGs and radio LAPs to reduce LAP variations for minor changes to technical specifications. There may be a perceived risk of weakened planning protections to existing and future services and/or an increased risk of interference.

When assessing proposals and conducting broadcast service planning and coordination, the ACMA generally:

- Uses actual or proposed antenna patterns for operating or planned services when available.
- Uses licensed (TL) operating ERP masks when actual antenna patterns are not known but the service is operating.
- Uses the radio LAP ERP mask when coordinating with planned, but not operating, services. This includes when temporary services, including TCBLs, are using a LAP frequency.

This approach is not proposed to change, nor are the protection ratios or other elements of the discussed supporting technical guidance. New or varied services will always be assessed and planned to avoid interference to other broadcasting services in line with the supporting guidance. The proposed increase in flexibility is intended only to reduce the administrative burden of unnecessarily having to perform LAP variations for small changes.

We recognise that the radio market environment is different to television, so that there is often a desire to tightly manage overspill between adjacent radio licence areas. There is no intent to significantly relax overspill management.

### **Question 12**

What are your views on the risks of increasing flexibility to the TPGs and radio LAPs?

## **Dissimilar and/or poor coverage due to weakening of minimum coverage criterion guidelines**

We have discussed considering changing or removing the requirement for minimum coverage criterion for one or more categories of broadcasting service. This may result in future reduced coverage of existing services or dissimilar coverage between similar radio or television services in a licence area. Given that:

- National broadcasting services have no such requirement, or any requirement to be co-located with commercial radio or television services.
- Community and commercial radio and television broadcasting services know the area they want to serve effectively based on their intended audience.
- In competitive markets, there are natural incentives to operating at similar power levels.

Our view is that changing minimum coverage criteria may sensibly leave general coverage decisions to the relevant licensee.

#### **Question 13**

What are your views on the risks of changes to the minimum coverage criteria?

#### **Difficulties in transitioning a temporary community broadcasting service to a community broadcasting service due to different minimum coverage criterion guidelines**

We have discussed considering changing or removing the requirement for minimum coverage criteria for one or more categories of broadcasting service. If a decision was made to give more flexibility to a TCBL that is using a LAP specification, but not a long-term community broadcasting licence, this may result in the infrastructure (e.g. antenna and transmitter) used for the TCBL not being able to meet the relevant criterion for any eventual long-term licence.

This could be solved by:

- TCBLs increasing coverage when granted the permanency of a CBL by choice.
- Ensuring there is an exemption mechanism in the TPGs to be able to relax the minimum coverage criterion for a long-term community broadcasting licence in such a case.
- Highlighting this issue in some way for TCBLs, to encourage licensees to comply with a future minimum coverage criterion. This could be via an advisory note on the TL for a TCBL or in communications during the licensing process for a TCBL.

This would not be an issue if the minimum coverage criterion were removed.

#### **Question 14**

What are your views on the risks of possible differential minimum coverage criteria between TCBLs and long-term community broadcasting licences?

#### **Issues created by aligning interference management clauses**

We have discussed considering aligning interference management clauses across the various broadcasting service types. This would likely require the following changes:

- Requiring licensees of all TLs for broadcasting services to fit devices to transmitters and receivers, if required, when resolving interference to other broadcasting services. This would then include national broadcasting services, narrowcasting services and 're-transmission services'.
- Changing interference management obligations for broadcasting services currently subject to the TPGs in relation to managing interference to radiocommunications services, to limit obligations to only those radiocommunications services established before the relevant broadcasting service.
- Removing obligations to avoid interference to class licensed transmitting devices.

#### **Question 15**

What are your views on the risks of changing the interference management requirements for broadcasting services, narrowcasting services and 're-transmission services'?

# Invitation to comment

## Making a submission

We invite comments on the issues set out in this consultation paper.

- [Online submissions](#) can be made by uploading a document. Submissions in PDF, Microsoft Word .DOCX format, or Rich Text Format are preferred.
- Submissions by post can be sent to:

The Manager  
Broadcast Spectrum Planning Section  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

The closing date for submissions is **COB, Wednesday 23 September 2026**.

Consultation enquiries can be emailed to [broadcastplanning@acma.gov.au](mailto:broadcastplanning@acma.gov.au).

## Publication of submissions

We publish submissions on our website, including personal information (such as names and contact details), except for information that you have claimed (and we have accepted) is confidential.

Confidential information will not be published or otherwise released unless required or authorised by law.

## Privacy

View information about our policy on the [publication of submissions](#), including collection of personal information during consultation and how we handle that information.

Information on the *Privacy Act 1988*, how to access or correct personal information, how to make a privacy complaint and how we will deal with any complaints, is available in our [privacy policy](#).

We may use an Artificial Intelligence (AI) tool to analyse and summarise your submissions for internal purposes to inform the development of further proposals for remaking the Broadcasting Services (Technical Planning) Guidelines 2017. This may include using AI to summarise submissions you provide that may contain personal information.



# Attachment A: Broadcasting technical regulation map

| BSA                                                                             | RA                                                                                                                                                                    | LAPs                                                                                                                                                                                                                                                                                                                                                                 | TPGs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | LCD                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | TLs                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Part 3: S.23 planning criteria: promote efficient use of spectrum etc.          | S.107 (1) (g) and S109 (1) (f), allows ACMA to apply TL conditions to TLs                                                                                             | <u>Radio LAP TSs currently specify:</u> <ul style="list-style-type: none"> <li>Nominal site, clauses allow site to vary if TPGs are otherwise met</li> <li>Maximum antenna height</li> <li>Frequency band, mode and frequency</li> <li>Polarisation</li> <li>Maximum CMF/ERP for each direction</li> </ul> May spec. a different minimum field strength than planned | Made under BSA S.33<br><u>Part 1 – Preliminary</u><br>Applies to broadcasting, DRMT licensees. Definitions etc.<br>Includes the-planned minimum field strengths<br>8: Site tolerance is redundant for newer LAPs which have the site tolerance clauses in the LAP.<br><u>Part 2 – Start up procedures</u><br>Applies for new or changed transmissions<br>Covers test transmissions, publicity, identifications, must operate in accordance with LAP, DRCP or TL, resolution of interference<br><u>Part 3 – Coverage and interference</u><br>11: Minimum coverage if at nominal LAP/DRCP site. Applies unless otherwise in LAP, DRCP or TL. Transmissions must be within 5dB below LAP/DRCP ERP (and for >=60% of each arc for a DA pattern).<br>12: Minimum coverage if not at nominal site. Must cover same urban centres had it been at nominal site.<br>13: Overspill limits if not a nominal site. Cannot exceed pop overspill had it been at nominal site.<br>14: Overspill limits if no nominal site in LAP/DRCP. Field strength (FS) in any urban centre outside licence/BSA radio area cannot exceed planned min FS or that with nominal transmitter parameters<br>16: Interference to broadcasting services. Must resolve at causer expense if within another's service area.<br>17: Interference to other radiocommunications. Must resolve in consultation.<br><u>Part 4 – Change of site or TS parameters</u><br>Must perform EMC calculations assuming the maximum ERP in a LAP TS for the transmitter.<br><u>Part 5 – Requirements</u><br>21: Maximum field strengths population limits<br>22: Radiated signal characteristics. Emission requirements/limits. | Made under RA S.110A(2)<br>Specifies minimum field strengths for services under the LCD.<br><u>Part 2 - National services</u><br>8: start up advertising requirements<br>9: Can use for test transmissions<br>10: Can't cause interference to the service area of other broadcasting or ON services<br>11: Emissions must meet guidelines 21 and 22 of the TPGs<br><u>Part 3 – Narrowcasting service</u><br>13: start up advertising requirements<br>14: can only use for ON<br>Must comply with part 2 start up procedures in the TPGs.<br>15-17: AM HPONs must limit CMF to LAP CMF if LAP TS exists and must limit skywaves<br>All must comply with guidelines 11, 12, 13 of TPGs<br>21: Can't cause interference to the service area of other broadcasting or ON services<br>22: Emissions must meet 21,22 of the TPGs<br><u>Part 5: TCBLs</u><br>29: Can't cause interference to the service area of other broadcasting or ON services<br><u>Part 6: Re-transmissions</u><br>31: start up advertising requirements<br>33: Can't cause interference to the service area of other broadcasting or ON services<br>34: Emissions must meet guidelines 21 and 22 of the TPGs | Operating licence TS for broadcast services are TL licence conditions to be complied with.<br><br>From s.102 of the RA, if a <u>bsb</u> licence is held, ACMA must issue TL (except DAB conditions)<br><br>TL TS specify: <ul style="list-style-type: none"> <li>Site location</li> <li>antenna height</li> <li>Frequency</li> <li>Polarisation</li> <li>Maximum CMF/ERP for each direction</li> <li>A different minimum planning field strength if applicable</li> </ul> |
| S.26 ACMA must prepare LAPs, non-DAB must include technical specifications (TS) | S.109 (1) (d), (da) BSL services (Commercial, Community) subject to BSA 26(1) (LAPs) must not operate other than in accordance with LAP TS                            | <u>TV LAPs (TLAP) currently specify:</u> <ul style="list-style-type: none"> <li>General area served</li> <li>Television channel</li> <li>Maximum overall ERP</li> <li>polarisation</li> </ul> Clauses allow ERP to exceed that in the TLAP, if ACMA authorise a licence and, it complies with TPGs, or ERP <=5dB above LAP ERP                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| S.33 ACMA to develop TPGs for services in the BSBs                              | S.109 (1) (e), all BSA Part 4 and 6 TLs in the BSBs must comply with TPGs (i.e. Commercial, Community)                                                                |                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Part 4 and Sch 2: Commercial TV and radio                                       | S.109B(1)(n), DRMT licences must comply with TPGs                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Part 6 and Sch 2: Community broadcasting                                        | s110A(2): Enables ACMA to create instruments for common conditions for apparatus licences classes, such as the broadcast transmitter LCD for certain broadcasting TLs |                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

## Glossary for the broadcasting technical regulation map

|              |                                                                                                  |
|--------------|--------------------------------------------------------------------------------------------------|
| <b>AM</b>    | amplitude modulation                                                                             |
| <b>BSA</b>   | <a href="#">Broadcasting Services Act 1992</a>                                                   |
| <b>BSBs</b>  | broadcasting services bands                                                                      |
| <b>BSL</b>   | broadcasting services licence                                                                    |
| <b>CMF</b>   | cymo-motive force                                                                                |
| <b>DA</b>    | directional antenna                                                                              |
| <b>DAB</b>   | digital audio broadcasting                                                                       |
| <b>DRCP</b>  | digital radio channel plan                                                                       |
| <b>DRMT</b>  | digital radio multiplex transmitter                                                              |
| <b>EMC</b>   | electromagnetic compatibility                                                                    |
| <b>ERP</b>   | effective radiated power                                                                         |
| <b>HPON</b>  | high power open narrowcasting                                                                    |
| <b>LAPs</b>  | licence area plans                                                                               |
| <b>LCD</b>   | <a href="#">Radiocommunications Licence Conditions (Broadcasting Licence) Determination 2025</a> |
| <b>ON</b>    | open narrowcasting                                                                               |
| <b>Sch</b>   | Schedule                                                                                         |
| <b>TCBLs</b> | temporary community broadcasting licences                                                        |
| <b>TL</b>    | transmitter licence                                                                              |
| <b>TPGs</b>  | <a href="#">Broadcasting Services (Technical Planning) Guidelines 2017</a>                       |
| <b>TV</b>    | television                                                                                       |