

23 September 2026

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

BAI Communications Response to
**Proposal to Remake the Broadcasting Services (Technical Planning)
Guidelines 2017**
Consultation Paper

Dear Sir/Madam,

BAI Communications is pleased to have the opportunity to comment on the discussion paper. BAI supports the ACMA's overall aim of increasing flexibility and reducing administrative burden in the technical planning framework. As the owner and operator of shared broadcast transmission infrastructure used by both national and commercial broadcasting licensees, our comments focus on the practical, on-the-ground implications of the proposed changes.

BAI is, in general, agnostic as to which legislative instrument (the TPGs or the LCD) carries a given obligation, provided that this does not result in the same matter being subject to overlapping or duplicative regulation across the two instruments; our primary interest is in consistent, workable outcomes across the different licence types whose infrastructure we manage on common sites.

BAI's comments are presented below according to the relevant question in the discussion paper.

Question 1 – Scope of consideration for changes to the Framework

BAI supports the identified scope. If a review of the Technical Planning Parameters (TPPs) cannot be completed in time to be included in this round, BAI would encourage the ACMA to treat TPP alignment with international standards as a priority for the next available review cycle, given the flow-on benefit to more efficient spectrum use.

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Question 3 – Benefit of reviewing the minimum coverage criteria

Yes, there is benefit in reviewing the minimum coverage criteria to allow for minor coverage changes for site relocations or when operating from an alternate site such as temporary, standby or disaster recovery arrangements.

Question 4 – Other frequent scenarios not well accommodated

Two additional scenarios are common in BAI's experience as a tower and infrastructure owner:

- Ongoing antenna system maintenance – the same issues that arise for enforced site relocation or antenna height discrepancies also arise where significant maintenance work requires a temporary or permanent change to antenna configuration.
- Tower aperture management for new co-located users – minor relocation of a broadcast antenna (including relocation to a height above the LAP maximum) is sometimes the only practical solution when structural constraints on a shared tower require space to be made for new users. This is a frequent, practical driver of the antenna height issue, not just an occasional edge case.

BAI would also note a further scenario relevant to disaster recovery: we operate mobile transmission trailers for disaster recovery purposes. These are low power, typically operate from a different site to the failed service (on the same frequency), and provide only limited coverage by design. Under the current Framework, deploying these would require regulatory forbearance, as they are unlikely to meet minimum coverage criteria or full start-up requirements. This is a concrete, recurring example of the general disaster recovery issue raised elsewhere in this paper (see also BAI's response to Question 6).

Question 6 – Exemptions to minimum coverage for emergency and standby transmissions

BAI welcomes the proposal to exempt disaster recovery and standby transmissions from the minimum coverage criteria.

BAI's mobile transmission trailers, deployed for disaster recovery, are low power, typically operate from a different site to the failed service (on the same frequency), and provide only limited coverage by design. They are highly unlikely to meet the minimum coverage criterion in their own right, but that is inherent to their purpose – restoring some service quickly, not replicating the full licensed coverage. BAI would support an exemption mechanism that recognises this class of deployment specifically.

Question 7 – Proposed changes to the overspill criteria

BAI supports introducing a new overspill criterion for assessing exceedances at a nominal site to bring more flexibility to overspill criterion. In the scenarios of a site relocation, or a temporary, standby or disaster recover transmission there may be incidental overspill that exceeds the nominal planned site in the LAP.

Question 8 – Alignment of start up procedures between the TPGs and the LCD

BAI sees benefit in this alignment, start-up procedures should be as consistent and administrative as possible across service types, particularly for disaster recovery and standby scenarios where speed matters more than a lengthy test period.

Question 9 – Alignment of interference management procedures between the TPGs and the LCD

BAI supports aligning interference management procedures. Consistency between the different licence types would make interference management considerably easier to administer, given BAI manages infrastructure hosting a mix of national and commercial operators. BAI would also support narrowing the obligation so that broadcasters only need to protect already-operating radiocommunications services, rather than an open-ended obligation extending to future radiocommunications services

Question 10 – Moving parts of the TPGs to the LCD

BAI would support moving the identified parts to the LCD, and more broadly supports standardising conditions across broadcasting service classes where practicable. As an infrastructure owner, BAI is largely agnostic as to which legislative instrument (TPGs or LCD) carries a given obligation – our interest is in the practical outcome. Consistency across licence types is valuable to BAI specifically because our customer base includes both national and commercial operators sharing common infrastructure; having materially different obligations for functionally similar situations. BAI would add that views on standardising conditions that fall more directly on licence holders (rather than infrastructure arrangements) are probably better sought from those licensees directly.

Question 11 – Flexibility to maximum antenna height and maximum ERP in radio LAPs

BAI strongly supports introducing this flexibility. As an infrastructure manager, this is one of the most practically significant proposals in this paper for how BAI manages tower aperture and shared infrastructure. Specific benefits BAI would highlight:

- It allows BAI to manage changes in antenna height required for issue management – for example, relocating antennas to mitigate interference to other services, accommodating changes to non-broadcasting-band services, or adjusting location to manage EME exposure limits around other co-located infrastructure.
- It supports minor antenna height changes needed to accommodate additional site users on a shared tower, which is a frequent, practical driver rather than an occasional edge case.
- There are genuine cases where a different technical configuration gives a better outcome than the nominal specification – for example, recent examples of operating at a higher antenna height with an omni pattern at a lower ERP, which achieved better coverage than the originally planned directional pattern, with minimal overspill implications.

A framework that can assess and approve these kinds of trade-offs (rather than requiring a full LAP variation) would be genuinely valuable.

Question 13 – Risks of changes to the minimum coverage criteria

This is probably a question for broadcasters to answer in detail, as they carry the primary coverage obligation. From an infrastructure perspective, BAI would note there is a balance to be struck between minimum population coverage and the commercial viability of operating multiple sites to meet that obligation

Question 15 – Risks of changing interference management requirements

BAI considers it would make sense to standardise interference management obligations across the different broadcast service types. The management requirements should be prescriptive to the extent that it is clear whose obligation it is to resolve the issue

Yours faithfully,



Matt Betts

Transmission Solutions Manager

BAI Communications