

PROPOSAL TO REMAKE THE BROADCASTING SERVICES (TECHNICAL PLANNING) GUIDELINES 2017

CRA SUBMISSION

Commercial Radio & Audio Limited (**CRA**) welcomes the opportunity to provide feedback on the ACMA's proposed changes to the Technical Planning Guidelines (**TPGs**), as outlined in the ACMA Consultation Paper *Proposal to remake the Broadcasting Services (Technical Planning) Guidelines 2017* dated August 2026.

We agree with the ACMA that the TPGs currently operate effectively and efficiently but can be improved in some areas. CRA submits that any changes that improve efficiency and streamline interactions would be a positive outcome.

Please find below CRA's response to the Issues for Comment set out in the Consultation 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?

We agree that the Technical Planning Parameters (**TPPs**) are overdue to be reviewed, revised and updated (they are of pre-2003 vintage and contain material regarding analogue TV, in need of revision to account for modern receivers improved performance, the increase in manmade noise, modern planning software etc). Although the ACMA is of the view that they could not be reviewed in conjunction with this TPG review and are out of the scope, CRA would like to know the timeframe that the ACMA plans to update the TPPs.

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

It would seem logical to combine the LCD and the TPG into the one document as many of the conditions are similar and repetitive. If not possible then consistency between them or reference to one set of conditions (in one or the other document) would be an improvement.

Standby antenna systems with reduced ERP capability or located at a nearby mast/tower are sometimes licenced while others are not. Does the standby arrangement need to be licenced if it was to be within a defined ERP/Distance/height tolerance of the main service?

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

The minimum coverage criteria does need to be reviewed to allow for temporary changes such as:

- routine maintenance (where transmission powers are reduced or transferred to a backup antenna for the EME safety of climbers near the antenna),
- faults where the transmitter or antenna has a failure or partial failure
- emergency transmission and disaster recovery
- sound quality improvement and damage prevention for the AM services when lightning or storm fronts are predicted and service transferred to a shorter mast and/or power reduced.
- Switching breaks, mains power outages, link failures etc.

Consideration should be given to potential removal of the minimum coverage requirement.

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

We agree that all 5 of the scenarios listed by the ACMA are credible and the framework needs to be modified to allow for these minor changes that are either temporary or have only a minor effect on overspill or coverage.

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?

Suggested changes to the Part 1 – 6 Interpretation:

- *National signal reception area* – should have an additional qualification added “and is interference free” to cover the cases where the reception area is interference limited and not field strength limited.
- *Technical operating specifications* – add polarisation and maximum ERP per polarisation. Also ensure it is ERP (and not EIRP)
- *Urban centre* definition could be made clearer by adding that it is a population cluster of 1000+ people

Part 2 – Start Up Procedures – we agree with the ACMA’s approach. Practically a stepped increase in power 3dB per week for a number of weeks until the full power has been used in the past. We request provision to allow for this methodology or flexibility for other approaches to be included.

Part 3 and Part 5 – Census Population – we agree with making it consistent for both parts.

Part 3 – 16 – Interference to other broadcasters – we agree with the ACMA in consolidating the interference-related issues.

Part 3 – 17 Interference to other services – radiocommunications - we agree with the alignment however the radiocommunications service needs to take reasonable steps to prevent the broadcast service causing interference (such as adding an overload filter or bandpass filter in the radiocommunications receiver/transmitter system).

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?

See 3 above. We suggest removal of the minimum coverage requirement should be considered.

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?

We agree with the ACMA that any changes need to allow for flexibility (rather than a single pass/fail criteria) and take into account existing interference levels. However, we don't support relaxing the rules to an extent that allow parties may extend their coverage without a clear, objective assessment criteria. Full consultation directly with the existing affected broadcaster is necessary.

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

Yes, see above.

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

Yes, see above.

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?

Yes, we see the simplification being a benefit.

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

Yes, we agree that flexibility in maximum height and ERP in the radio LAPs is desirable.

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

We agree that using actual antenna patterns is preferred as it may allow adjacent or distant services to be planned more tightly. Using a practical antenna pattern as opposed to a theoretical mask is a more elegant engineering methodology which results in a more accurate simulation.

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

We welcome the removal of the minimum coverage criteria in principle.

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

No comment.

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

The interference management requirements should be consistent for all radiocommunications users.

Other comments:

- 1) There have been cases where the EIRP has been used instead of the ERP (just over 2dB different) either by accident or on purpose. We think new services should submit a transmission equation to the ACMA that clearly shows antenna gain, feeder system losses, combiner losses and transmitter power to show how the ERP maximum is planned to be achieved. This would prevent EIRP being mistakenly used instead of ERP.
- 2) To ensure efficient use of spectrum, we submit the AM to FM conversion program would benefit from a clearer and more time-efficient process (with appropriate safeguards) for resolving cases where following negotiation, low power services do not agree to move to a frequency with an equivalent coverage.
- 3) Can datacasting options be dropped to improve clarity.

Thank you for the opportunity to participate in this consultation.

Commercial Radio & Audio
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