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To:

The Manager, Broadcast Spectrum Planning Section
Australian Communications and Media Authority, Belconnen ACT 2616 ACMA Broadcast

23 September 2026

Re: Proposal to remake the Broadcasting Services (Technical Planning) Guidelines 2017,
Consultation paper, August 2026

Dear ACMA team

Thank you for the opportunity to contribute to the consultation on the remaking of the Broadcasting Services (Technical Planning) Guidelines 2017 (the TPG) and the Radiocommunications Licence Conditions (Broadcasting Licence) Determination 2025 (LCD).

The consultation document provided useful background on possible adjustments that the ACMA are considering for the remaking of the TPG and LCD in 2027. We agree that the TPG remake process should be used to adjust the overall technical and licensing framework to support the future viability of the radio broadcasting industry for all stakeholders, including public, commercial and community broadcasters, service providers and to ensure maximum public benefit. This can include increased flexibility in assessing proposals from licensees, to reduce administrative burden and to increase alignment of requirements across broadcasting service types.

We provide input on the initial set of questions in the "Issues for comment" section and some additional focus on the overall strategic areas of the proposed and suggested options explored in the Consultation paper.

We will be very happy to discuss further as needed.

Yours Sincerely

Dr. Les Sabel

Principal Consultant and Managing Director



Issues for comment

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?
 - a. While adjustment to the TPG and LCD will help streamline existing processes and requirements there needs to be a more concerted focus on the planning requirements and process for DAB+. DAB+ rollout is currently blocked by the major commercial broadcasters due to their stated opinion that the new digital broadcasting medium will not help increase revenue. Consequently, regional Australian audiences have been denied access to new broadcast services for over a decade. Regional commercial networks have access to spectrum but are not using it resulting in a fallow resource and NOT efficient use of spectrum as the ACMA is mandated to aspire to. Additionally, the current planning arrangements were designed for the metropolitan markets and significantly favour commercial operators over community, new entrants and in some ways public service broadcasters. This has led to stagnation and misuse of the DAB+ broadcast medium. See “Additional Comments” below for additional discussion on this issue.
2. What are your views on the observed issues with the Framework and do you consider other issues should be addressed?
 - a. The TPGs generally provide a good framework but are often a bit too prescriptive and do not allow for small variations, e.g. in Horizontal Radiation Patterns (HRPs) which are caused by lack of options in the antenna systems. This can lead to both poorer area coverage within licence areas due to minor overspill limits and/or higher costs. This can also lead to extended studies and multiple reviews within the ACMA.
 - b. Within some of the suggestions you propose to have some degree of freedom for discretionary allowances, this could be good if used well but also runs the risk of inequitable results which could cause issues. This can be the case where adjacent Licence Areas (LAs) have different overspill populations due to “historic decisions” and which have no course for balancing under the current TPGs, e.g. guideline 13.
3. Do you believe there is benefit in reviewing the minimum coverage criteria? If so, what are those benefits?
 - a. Currently there is no TPG guideline that defines Overspill criterion at the nominal transmitter location, each transmission is considered by the ACMA and judged whether it would deliver excessive overspill against “internal norms”. Once the transmission is specified and licenced then the TPGs have various guidelines that are used if the nominal site is varied or the transmission power changed from nominal.
 - i. In essence guidelines 11 and 12 are primarily needed to ensure that Transmitter Licence (TL) holders actually deliver the service they are licenced for and in most case the broadcaster will want to ensure maximum coverage at all times.
 - ii. Guideline 13 ensures that overspill is limited in the case where the nominal transmitter location is varied
 - b. An alternative would be to use the LA boundary as the limiting case where overspill and/or interference should be limited to a specific number of people outside the nominal LA, e.g. 5% of the adjacent LA. The transmitter would then have a licensed power and pattern to achieve that coverage along with a minimum power of -5dB except for nominated maintenance and disaster situations. This could then allow for



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more variation within the HRP/VRP for below maximum ERP arcs and make the design of the HRP easier and more cost effective.

4. What other relatively frequent scenarios have issues that should be addressed? Give specific examples.
 - a. No comment
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?
 - a. Yes, there are several examples within this submission.
 - b. A specific area which has caused issues for a long time is the use of propagation planning tools and models. Our understanding is that the ACMA use the tools provided by LS Telcom such as CHIRplus, those tools are expensive and not readily accessible to many stakeholders, similarly ATDI HTZ and some other tools. The primary concern however is the use of propagation models. Both CHIRplus and ATDI include proprietary models as well as standard ITU-R models. We have experienced issues when comparing coverage and interference predictions where the different systems present different results primarily due to the use of different propagation models which are unavailable to both parties, ACMA and the consultant. The usual back-up for this situation is the use of ITU-R P.1546 model which is an empirical model from last century and while common it does not provide the level of accuracy that modern deterministic models provide.
 - c. We propose that the TPGs should include an Annex which defines the propagation models that will be used for each modelling scenario based on public ITU-R models such as ITU-R P.1812. Further we propose that while historically radio planning is done at a receiver height of 10m mainly due to TV rooftop antenna heights, radio planning is now commonly done for a receiver height of 1.5m. During the DAB+ Allotment planning done by industry stakeholders in the Digital Radio Planning Committee (2016-2018) and computed by the ACMA we agreed that the field strength difference for in VHF Band III between 10m and 1.5m reception would be 10 dB. More details can be found in the EBU Tech 3391 document which includes direct references to the field work done to resolve that value. These details should be included in the TPGs or perhaps a remake of the outdated Technical Planning Parameters (TPP) document – see more under additional comments below.
 - d. To summarize we propose that the propagation planning annex should include details of the following for each type of radio planning AM, FM, DAB+, DTV:
 - i. Propagation model
 1. Where appropriate sub-settings such as Diffraction model and Sub-path attenuation are defined
 - ii. Receiver height loss allowance between 10m and 1.5m
 - iii. Clutter classes and heights – here a common set of DTM clutter models would be useful with heights for each clutter class defined, and ideally provided by the ACMA in a generalised form that could be used by multiple toolsets
 - e. The provision of such data would allow the ACMA to work much more efficiently as individual input organisations (broadcasters, consultants etc) could be “verified” as “trusted” providers of coverage and interference prediction and not require the current multi-iteration of predictions and adjustments. Such “verification” could be done by simply producing results to a small set of coverage and interference scenarios. Of course the ACMA would be free to verify all inputs as they thought necessary.



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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?
 - a. Emergency transmissions are special cases in situations which can often include threats to lives during events such as floods, cyclones and bush fires. As such when an alternative site is needed to service a disaster area there should be significant allowance for immediate start-up without lengthy procedures to ensure that broadcast communications are available at the soonest possible time.
 - b. Given that flexibility the broadcaster / transmission provider should also provide best endeavours not to deliver excessive overspill or interference into non-disaster areas and to repatriate to the nominal site as soon as is practical.
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?
 - a. See 3b above
8. Do you see benefit in the alignment of start up procedures between the TPGs and the LCD?
 - a. Yes, they should be in one place only and referred to by the other documents, this would avoid any misalignment
9. Do you see benefit in the alignment of interference management procedures between the TPGs and the LCD?
 - a. The TPGs should define the interference limits, the LCD should provide the management aspects. As with the start up procedures discussed in 8. above the limits and the management should be in one place only and referred to by the other documents.
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?
 - a. As discussed in 8. and 9. above to avoid different interpretations, or have misalignment, relevant aspects should be defined in either the TPG or LCD only and then refer to in the other document. This may also apply more broadly.
 - b. In general, aspects which are used in planning should be included in the TPG while operational aspects such as start-up and management procedures should be included in the LCD.
 - i. Here we note that design includes functionality such as wanted/planned coverage areas and field strengths, interference field strength limits, coverage overspill limits, maximum, spurious and out of band emissions including what is grouped as EMC, indeed the EMC aspects should be separately stated within the TPGs.
 - ii. The Operational aspects are the requirements of the licence in terms of start-up and operating procedures and requirements.
 - iii. If used, this approach should cover all broadcasting services
 - c. Such an approach should be clearly stated in the beginning of both documents as in many scenarios both documents will be needed to understand and resolve situations, hence clear and accurate cross referencing will be essential.
 - d. Also, note that the definitions of planned minimum field strengths in the LCD in section 5 Interpretation does not include the DRMT licence. Using the above



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approach all field strengths will ONLY be defined in the TPG and cross referenced in the LCD (even if they are actually restated in the LCD for convenience – this will likely also apply to other definitions).

11. What are your views on introducing flexibility to maximum antenna height and maximum ERP in radio LAPs?
 - a. As discussed under point 2 above, allowing flexibility around the maximum values is a “double edged sword”. Flexibility can be useful in cases where minor ERP infringements in the maximum or other HRP arcs occur to allow realistic antenna patterns which will not significantly impact overspill population or interference situations however such variation will need to be balanced. Indeed such flexibility may allow some historic out of balance overspill situations to be rectified
12. What are your views on the risks of increasing flexibility to the TPGs and radio LAPs?
 - a. See 2. and 11. above
 - b. Most important is ensuring a viable future of radio in Australia. The constant pressure from global streaming giants is eroding the consumption of Australian radio of all types and in all listening scenarios. This is particularly the case for radio in the car where we increasingly see streaming Apps for those giants, e.g. Apple and Google being implemented and promoted with broadcast and even hybrid digital radio being forced from the front page of the in-car screen. This is also the case in some smart speakers where listener voice requests can result in international streams rather than a wanted Australian stream.
 - c. The establishment of the European Union (EU) Digital Communications Act (DCA) is likely to include mandates for all vehicles to include DAB+ and FM on the front page of car screens to ensure that broadcast radio is available in times of emergency. While this is out of scope for the current TPG/LCD updates it is worth noting for future planning and national requirements updates especially for a disaster prone country like Australia.
13. What are your views on the risks of changes to the minimum coverage criteria?
 - a. Given the wide availability of mobile communications, including the AusAlert system based on Cell-broadcast technology there needs to be some relaxation of previous stringent equivalent coverage requirements when alternative technologies are proposed. This includes AM to FM conversion and the introduction of DAB+ in regional Australia.
14. What are your views on the risks of possible differential minimum coverage criteria between TCBLs and long-term community broadcasting licences?
 - a. The “T” in TCBL says it all “Temporary”. Such transmissions should have an agreed lifetime for specific purposes before either ceasing transmission or becoming permanent services.
 - b. If the permanent CBL is for a different transmission location than the TCBL then the same planning guidelines regarding overspill and interference should be maintained.
15. What are your views on the risks of changing the interference management requirements for broadcasting services, narrowcasting services and ‘re-transmission services’?
 - a. All should be treated equally, each has its place in the radio ecosystem.



Additional comments

Proposal to review the DAB+ planning requirements and process

Given the scope defined in the consultation document we understand that the broadcasting licensing process is out of scope, however, we take this opportunity to flag some on-going issues which we believe should be addressed.

Specifically, we are concerned that the regional DAB+ rollout has basically stopped apart from some efforts in Launceston, Tasmania. We understand that there are several parties interested in pursuing DRMT licenses around Australia but are having difficulty in moving them forward even though the legislation does not seem to limit such applications.

We suggest that the current licensing process should undergo a review to ensure that unused spectrum is available to parties wishing to establish new DRMT services. This will be of great benefit to regional listeners providing improved range of services and in many cases improved reception quality.

The use of DAB+ in regional areas will also provide significant emergency warning services through the DAB+ Automatic Safety Alert (ASA) system which is now being actively deployed in Germany and is being trialled in many countries in Europe and around the world.

Technical Planning Parameters

We also find the Technical Planning Parameters document (2004) is out of date in a number of areas and does not even include a section of DAB+ planning. We suggest that this document should also be the subject of a review and remake. It would be useful to undertake that remake in parallel with the TPG / LCD remake to ensure that technical information and requirements are consistent between the various documents.

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