



23 September 2026

Australian Communications and Media Authority

Via ACMA Website Submission

ABC submission to the ACMA consultation regarding:

Remaking the Broadcasting Services (Technical Planning) Guidelines 2017

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to provide this submission to the ACMA's preliminary consultation *Remaking the Broadcasting Services (Technical Planning) Guidelines 2017*, which was released by the Australian Communications and Media Authority (ACMA) in August 2026.

Any proposed changes to existing technical framework that results in increased flexibility and reduced administrative burden, while maintaining access to services for audiences in an environment of evolving technology is, in principle, welcomed. For example, explicitly listing the relevant broadcasting services that the *Broadcasting Services (Technical planning) Guidelines 2017* (TPGs) apply to and clarification of the intent and scope of the various framework documents, as proposed, would be very helpful. Likewise, improving flexibility in terms of managing small variations in technical characteristics such as antenna height and ERP, including flexibility in compliance with maximum antenna height and ERP would also be very helpful.

However, from the ABC's perspective, there are changes proposed which would result in increased complexity, administrative burden and cost, particularly for national broadcasters.

Firstly, in relation to Start up procedures, national broadcasters are currently subject to clause 8 of the *Radiocommunications Licence Conditions (Broadcasting Licence) Determination 2025* (the LCD). The TPGs also contain Start up procedures, but these are different to those in the LCD in that they require a 7-day test transmission, as well as other minor differences. The ABC understands the proposal is to effectively consolidate the TPG's Start up procedure requirements into the LCD and make them applicable to all broadcasting licence categories. The ABC submits that the proposed procedure should either retain the current LCD conditions for the national broadcasters or preferably, make the current LCD conditions apply to all broadcasters, including for television services.

The consultation is considering alignment of interference management procedures across the different broadcaster licence categories. This could result in an additional burden for the national broadcasters in the requirement to adjust, or fit devices to transmitters, and receivers if necessary, a requirement which does not currently apply. We believe a sensible approach would be to adopt the harmful

interference conditions in the current LCD, which are applicable to the national broadcasters and apply these to all broadcasters.

Overall, the ABC is in favour of increased flexibility in the application of guidelines and conditions, however we are mindful of the potential risk this may introduce to the operation of incumbent, compliant services. We believe that such risk should be borne by the licensee of the services making use of the more flexible conditions.

Following this preliminary phase of consultation, we look forward to further submissions on the detail of the proposed changes to ensure the appropriate balance between increased flexibility and stable regulation is achieved.

Yours sincerely



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