1. Introduction

1.1 The Community Broadcasting Association of Australia (CBAA) welcomes the opportunity to provide comments on the consultation draft of the ACMA Five-Year Spectrum Outlook 2026-31 with a specific focus on the work program for 2026-27.

1.2 The Community Broadcasting Association of Australia is the peak body for community broadcasting licensees in Australia, with both radio and television members.

1.3 Guiding principles underpin community broadcasting Codes of Practice and the contribution of community services to media diversity and social inclusion.

1.4 Community broadcasting licences are issued pursuant to and in promotion of the objects of the Broadcasting Services Act 1992 (BSA).

1.5 The legislative intent is that community radio services be considered part of the mix of primary services in each area and be available on a free-to-air basis, whether via analogue AM or FM, and/or DAB+ digital radio.

1.6 More than 450 not-for-profit community radio broadcasters deliver over 500 services via AM, FM and DAB+ digital radio across Australia.

1.7 Community radio broadcasters play a vital role in connecting and informing communities - providing services with significant public benefit, including a diverse mix of social and cultural interests, specialist talks and music, and high levels of local content and presentation. Community broadcasting is recognised for its role in emergency resilience, and as a platform for original Australian content and music.

1.8 Community interests addressed include Indigenous services, radio reading services for the print disability community, youth, seniors, LGBTQIA+, religious and faith-based services, ethnic language and multicultural radio, specialist music, educational and general geographic services.

1.9 In metropolitan areas there is a greater number of specific community interest services. In regional and rural communities, community radio stations more frequently provide diverse programming covering broad community interests under a general geographic licence, with a high number of Indigenous services in remote locations.

1.10 Community analogue radio stations operate overwhelmingly in the VHF-FM band, and in the majority of regional towns and cities across Australia, with approximately 75% located in regional and remote areas, and 25% across metropolitan locations.

1.11 Community DAB+ digital radio services operate under long-term licensing arrangements in Sydney, Melbourne, Brisbane, Adelaide, Perth.

1.12 As well as these metropolitan areas, Community DAB+ digital radio services operate in Canberra, Hobart, Darwin and the Gold Coast, with more stations and areas committed to implementation of DAB+ digital radio services.

1.13 A total of 54 licensees are currently providing over 67 free-to-air community digital radio services to listeners.

1.14 Trials of DAB+ digital radio services have been operating in Launceston, Northern Tasmania, alongside the intention to introduce permanent DAB+ digital radio services in the near term.

1.15 Trials of targeted coverage DAB+ digital radio services have been operating in Sydney. The trials have been exploring options for digital radio multiplex transmission arrangements, alongside the intention to address current wide-coverage capacity and service limitations, and pathways for community radio services not yet on-air using free-to-air DAB+ digital radio delivery.

1.16 Community television services operate in Melbourne and Adelaide, with access to broadcast band spectrum for delivery of free-to-air digital television services, previously subject to renewal under repeated consecutive short-term arrangements, now at the discretion of the ACMA, based on there being no alternative use identified for the relevant spectrum.

2. Broadcasting - radio planning priorities

2.1 At page 42, the draft FYSO document lists the current radio broadcasting priorities of the ACMA as being:

- converting commercial, national and community broadcasting services from AM to FM where FM spectrum is available
- Enhancing coverage of national, commercial and community broadcasting services where spectrum is readily available
- making digital radio channel plans for regional DAB+ if a commercial or national broadcaster has committed to a rollout
- supporting trials of new broadcasting technology.

3. Priority to make digital radio channel plans

3.1 While the CBAA supports all four priority points, the CBAA has a headline concern to amend the third point, which it has flagged previously, and which needs attention.

3.2 The CBAA remains resolute on this matter and requests that the third priority point be amended to read:

- *making digital radio channel plans for regional DAB+ if a commercial, community or national broadcaster has committed to a rollout.*

3.3 The CBAA considers the omission of community broadcasting from this priority setting on Page 42 to be an error that should be corrected.

3.4 It is not appropriate that the ACMA accord priority to commercial licensees or national broadcasters, yet not give that same priority to community broadcasters.

3.5 Community broadcasters are entitled to expect the ACMA to treat a commitment from the community broadcasting sector to roll out digital radio in an area with equal regard as it would a commitment from a commercial licensee or national broadcaster.

3.6 Where a community radio licensee, or a collective of community radio licensees, makes a commitment to rollout digital radio, there is no basis for the ACMA to pre-emptively determine that commitment is not possible to fulfill.

3.7 There are a number of regional locations where the community broadcasting licensees and sector have identified and negotiated cost-effective arrangements to bring about delivery of digital radio services.

3.8 The CBAA understands that in some cases the priorities and business situation of a commercial broadcasting licensee may mean it is not currently motivated or able to bring the benefits of digital radio to listeners in a given area. That is a decision for each commercial broadcasting licensee.

3.9 While it has been the pattern in metropolitan and regional areas to date for commercial broadcasters to participate in the rollout of digital radio, a decision by a commercial broadcasting licensee is not and should not be determine whether community broadcasters in an area can rollout and implement digital radio services.

3.10 The priorities and business decisions of community radio broadcasters are often quite different to commercial broadcasters, especially in regional areas.

3.11 Digital radio implementation represents a highly cost-effective option to deliver free-to-air radio broadcast services with much improved audio and reception quality, and a way to unblock often tightly-wound block program schedules so as to deliver an increased diversity of services to listeners.

3.12 The ACMA should facilitate and not delay improvements that benefit listeners, nor frustrate a legitimate commitment made by the community broadcaster/s to rollout digital radio services.

3.13 Another factor is the national broadcasters, where there can be significant cost and other synergies and efficiencies when digital radio transmission facilities are shared.

3.14 Whether or not a commercial radio licensee participates in the initial implementation, these synergies and efficiencies can bring benefit for the national broadcasters and the community broadcasters, and listeners.

4. Priority on AM to FM conversions

4.1 The ACMA has a radio planning priority to convert commercial, national and community broadcasting services from AM to FM where FM spectrum is available.

4.2 The ACMA 2025-26 work program proposed to finalise variations to the Perth and Remote Western Australia Radio Licence Area Plans (LAPs) within 2025-26. The Remote Western Australia variation is now listed for consultation during 2026-27, with consultation commencing in Q2, presumably Q2 2026.

4.3 Perth LAP variations were finalised sufficient to facilitate recent closure of several analogue AM radio services of the ABC, which gave rise to a set of impacts, several being highly consequential to Perth community broadcasters. The CBAA is aware the ACMA has taken a constructive and proactive role to facilitate changes affecting those licensees.

4.4 The ACMA 2026-27 work program proposes to consult on possible variations in a number of regional radio licence areas to facilitate AM to FM conversions, and this has now been expanded to include both solus and competitive commercial radio licence areas.

- Solus licence areas may include:
  Gunnedah, Hamilton, Horsham, Inverell, Lismore, Lithgow, Moree, Parkes and Young.
- Competitive licence areas may include:
  Albury, Atherton, Bunbury, Canberra, Coffs Harbour, Dubbo, Kempsey, Maryborough (Bendigo), Maryborough (Qld), Murwillumbah, Muswellbrook, Newcastle, Orange, Sale, Toowoomba, Wagga Wagga and Warragul.

4.5 The ACMA notes that proceeding with developing and consulting on each Radio LAP variation depends upon the relevant licensees making timely strategic business decisions on available implementation options.

4.6 The draft 2026-31 FYSO and 2026-27 work program lists a set of activities indicating a strong focus of broadcasting policy and engineering resources on conversion of commercial AM broadcasters to FM, and the ACMA has established a Broadcasting Technical Liaison Group to discuss AM to FM conversion in regional licence areas.

4.7 The majority of community broadcasters in regional areas already broadcast on VHF-FM. Decisions were made by the community broadcasting sector, dating from

the 1970s, to operate using FM, rather than AM. The community broadcasting sector led in this, well ahead of commercial or national broadcasters, recognising the listener benefits, along with significant real estate, capital and operational cost and energy efficiencies. Similar arguments now present for adoption of DAB+ digital radio.

4.8 Whilst the CBAA does not question the right of any regional commercial AM broadcaster to decide it might now wish to convert to FM broadcasting, the CBAA is concerned that ACMA priorities and broadcast policy and engineering resources ought not focus on this process to the detriment of other forward-facing radio broadcast outcomes for listeners, or for any long-term licensed community broadcaster, already operating on FM, to be compelled to make way for a commercial broadcaster, unless there is mutual agreement.

4.9 The ACMA gives effect to AM to FM conversions through variations in Radio Licence Area Plans (LAPs). Radio LAP variations are made in accordance with the process and criteria set out in the Broadcasting Services Act 1992.

4.10 The legislated Planning Criteria at Section 23 are relevant, as are, in turn, the Objectives of the Act, as set out in Section 3. Community broadcasting licenses are issued and provide for broadcasting service outcomes pursuant to the objects of the Act.

4.11 Importantly, at a regulatory and policy level, the CBAA underlines Principle 3 of the ACMA *Principles for planning AM to FM conversions in regional licence areas*[1] which makes plain there will be no re-planning of existing services unless agreed between affected broadcasters.

4.12 The CBAA is aware that brokering agreement with community broadcasters may be a relevant factor and, in some cases identified as a necessary prerequisite for planning outcomes for commercial or converting broadcasters in a number of radio licence areas.

4.13 The CBAA is concerned that where an impact is identified by a converting broadcaster on another broadcaster, particularly to a community broadcaster, and where agreement of that affected broadcaster cannot be reached, that the ACMA undertake an independent policy and engineering analysis to test for other solutions, rather than relying only upon the policy and engineering assessments of a converting broadcaster.

4.14 Other solutions should include identifying alternative options for the converting broadcaster, and assessing each alternative in terms of cost, coverage, broadcast service and policy objectives, and spectrum efficiency. This would assist in obtaining best outcomes for listeners and encourage a stable radio broadcasting environment.

4.15 Other solutions may include use of free-to-air DAB+ digital radio as part of the solution set, noting that DAB+ provides genuine listener benefits in terms of audio and reception quality, and genuine service diversity through the opportunity to add many extra and multiple services for all broadcasters, not just a singular FM service with content that replicates and/or replaces the existing converting or commercial AM service.

5. Priority on enhancing coverage

5.1 The ACMA has a radio planning priority to enhance coverage of national, commercial and community broadcasting services where spectrum is readily available.

5.2 The CBAA fully supports this priority, and is pleased that the priority is relevant to national, commercial and community broadcasters, and not limited to any particular type of location. In other words, the priority does not have a focus limited to

[1] September 2022, Principles for planning AM to FM conversions in regional licence areas, ACMA, Principle 3.

specifically metropolitan, regional or remote area coverage enhancement. National, commercial or community services in any of type of location align with this priority to enhance coverage.

5.3 The CBAA also supports that this priority is not limited to any particular type of technology. In other words, the priority is not limited to AM, or FM or DAB+ digital radio. National, commercial or community services proposing any of these types of free-to-air radio broadcast technology align with this priority to enhance coverage.

5.4 In terms of spectrum being readily available, it is well documented that while FM channels may be available, in many areas they may not be readily available. Metropolitan and some adjacent regional areas being a case in point. In those locations the work and resources required by the ACMA to plan for coverage enhancement using FM may be significant.

5.5 By contrast, DAB+ digital radio channels are well known to be readily available. A national allocation plan for DAB+ has already been undertaken and completed, with the significant investment of resources over several years by ACMA and industry, including the CBAA.

5.6 The work of that ACMA and industry group developed proto-digital radio channel plans, published by the ACMA on its website, and now, moving forward, the efficient start point for the making of each formal digital radio channel plan.

5.7 Therefore, while it is understood that the ACMA may have limited resources, there is very little further work required by the ACMA to assess proposals for coverage enhancement where use of DAB+ is proposed, and, similarly, very little further work required by the ACMA to make digital radio channel plans for areas where a commitment is made to implementation by a national, commercial or community broadcaster.

6. Priority on trials

6.1 The ACMA has a radio planning priority to support trials of new broadcast technology.

6.2 The CBAA fully supports this priority.

6.3 As noted, trials of DAB+ digital radio services have been operating in Launceston, Northern Tasmania, alongside the intention to introduce permanent DAB+ digital radio services in the near term. As well as multiplex technology innovations, these trials have explored use of targeted coverage technology solutions. Alternative sites are being scoped and the CBAA looks forward to support from the ACMA in this during 2026-27.

6.4 Trials of targeted coverage DAB+ digital radio services have also been operating in Sydney. The trials have been exploring options for digital radio multiplex transmission arrangements, alongside the intention to address current wide-coverage capacity and service limitations, and pathways for community radio services not yet on-air using free-to-air DAB+ digital radio delivery. Alternative sites are also being scoped and the CBAA looks forward to support from the ACMA in this during 2026-27.

7. Activities planned for 2026-27

7.1 At Page 43 of the draft 2026-27 work program, the CBAA is pleased to note the ACMA plans to engage on requests for trials of digital radio and potentially issuing further scientific licenses for trials.

7.2 The CBAA is also pleased to note the ACMA plans to engage following requests for making or varying digital radio channel plans and potentially consulting on these proposals. The CBAA reiterates its headline concern that positive engagement be triggered if there is a commitment to DAB+ digital radio rollout expressed by a community broadcaster, irrespective of whether a commitment on the same timeline is also expressed by a commercial or national broadcaster.

7.3 The CBAA supports the planned consultation on remaking of the Broadcasting Services (Technical Planning) Guidelines, noting the existing Guidelines are due to sunset in 2027.

7.4 The CBAA supports the other activities planned for 2026-27, and, consistent with previous correspondence and submissions in relation to AM to FM conversion and radio planning principles in regional areas, the CBAA requests that the ACMA adopt a policy that:

- where the ACMA proceeds to develop and consult on a Radio LAP variation, and, in particular where that is to effect regional AM to FM conversion, that, if not already published, the ACMA also consult and publish the relevant Digital Radio Channel Plan (DRCP), with a view to declaring a Foundation Licence.

8. Closing the Gap

8.1 Page 14 of the 2026-27 draft notes the ACMA has been asked to consider how First Nations services may be prioritised in large population centres where there is currently no First Nations radio presence.

8.2 The CBAA encourages ACMA in this matter and notes the significant utility of free-to-air DAB+ digital radio in achieving this positive outcome.

8.3 First Nations Indigenous radio services are already on-air using DAB+ digital radio in Sydney, Melbourne, Brisbane, Perth, as well as Darwin.

8.4 The CBAA encourages and would be pleased to see licensing outcomes for First Nations Indigenous community radio services to access DAB+ digital radio in other locations already on-air with DAB+ digital radio, including Adelaide, Canberra, Hobart and the Gold Coast.

9. Specific DRCP consultation locations

9.1 The CBAA has previously advised the ACMA of demand for free-to-air DAB+ digital radio services in a number of locations, with demand driven by community broadcasters.

9.2 The CBAA has arrangements to facilitate and support the implementation, delivery and operation of digital radio services provided by community radio licensees.

9.3 To address this demand, the CBAA requests that the ACMA anticipate the following as specific locations and priorities for action, including for DRCP consultation, with timelines across 2026-27.

- First priority areas may include:
  - Northern Tasmania, Launceston.
  - Sydney and adjacent, Gosford, Newcastle, Wollongong, Katoomba, Campbelltown.
  - Adelaide.
  - Perth and adjacent, including Mandurah, and areas further south.
  - Brisbane and Gold Coast adjacent, including Lismore/Murwillumbah, Nambour.
- Other areas may include:
  - Cairns, Coffs Harbour, Melbourne and adjacent, Geelong.

9.4 The CBAA notes that proceeding with developing and consulting on each DRCP may be prioritised only after the ACMA receives a commitment to rollout DAB+ digital radio from a community broadcaster, or a commercial or national broadcaster.

10. Deeming for community broadcasting licence areas

10.1 The CBAA reiterates its request the ACMA prioritise deeming of community radio licence areas with demand driven by community broadcasters, and especially where digital radio services are already on-air in trials, or may be anticipated.

10.2 In the case of Launceston, for example, it would be procedural for the ACMA to quickly make a determination using its powers under the Broadcasting Services Act Section 8AD(3) to deem the relevant community radio licence areas to be the same as the commercial radio licence area for the purposes of digital radio.

10.3 The population overlap of two community radio licence areas - Launceston RA2 and Hobart RA4 - with the commercial radio licence area - Launceston RA1 - is all but total, at over 96%.

10.4 Given the near total population overlap, this particular determination can and should be considered procedural. If any further consultation was required, it should be expedited.

11. About the CBAA

The Community Broadcasting Association of Australia (CBAA) is the national peak body for community broadcasting licensees. We are proud to be awarded Association of the Year 2025. The CBAA is a cultural organisation established for the promotion of community broadcasting including both radio and television. Over 90 per cent of all community broadcasting licensees are CBAA members. They play an important role in providing a voice for communities that aren't adequately serviced by other broadcasting sectors, including:

- First Nations communities
- Culturally and linguistically diverse communities
- Educational services
- Faith-based communities
- People with a print disability
- Music, arts and cultural services and communities
- Youth and seniors' communities
- LGBTQIA+ communities

The CBAA is a company limited by guarantee and is also a large registered not-for-profit entity under the ACNC.

12. Further Information

Please contact [redacted], Head of Advocacy and Communications Community Broadcasting Association of Australia for further information ([redacted]; [redacted]).