Re: Proposed variation to the Radio communications (Digital Radio Channels Queensland) Plan 2007 - Brisbane

Dear Sir,

Comments in this submission relate to the proposal to vary the technical specifications for the three Brisbane digital radio multiplex transmitter (DRMT) licences to vary the output radiation pattern to allow greater ERP levels and improve coverage within the Brisbane RA1 licence area.

Introduction

The Hot Tomato Broadcasting Co Pty Ltd (Hot Tomato) holds one of the three commercial radio licences in the Gold Coast RA1 licence area which adjoins the Brisbane commercial radio licence area.

Whilst there is no overlap between the Brisbane and Gold Coast markets signal overspill has been a continual issue of concern and one which has been raised with the Australian Communications and Media Authority (the ACMA) previously.

As the overspill of signal is a longstanding issue in the analogue environment any proposal that accentuates that problem in a DAB+ scenario will, for this group, require remediation.

Background

Hot Tomato is one of the three commercial radio licensees in the Gold Coast radio RA1 licence area and is directly affected by any change to the current configuration of the antenna patterns for the Brisbane DAB+ services.

In previous correspondence with the ACMA Hot Tomato, through its membership of Commercial Radio Australia (CRA), have consistently, for some many months now, objected to the removal of the “notch” or increase the power at Mt Mee and have not been able to reach any form of compromise with the Brisbane licensees on the matter.

As stated in that earlier correspondence because of the proximity of the Brisbane and Gold Coast commercial licence areas there would always potentially be overspill issues – this, as mentioned previously, is a historical and unfortunate fact. That overspill situation applies to analogue radio and also with the existing DAB+ services operating from Brisbane under the specifications proposed. This matter will be addressed in more detail under “issues” below.
Whilst there are no DAB+ services at this point in time on the Gold Coast due to the status of DAB regional planning – I note with some interest the DRMT that is proposed for the licence area under a separate proposal.

Issues

There are a number of issues that, in our view, need to be addressed before we can support the proposal to vary the technical specifications for the three Brisbane DRMT licences. The two immediate issues are:

**Overspill into Gold Coast RA1 licence area**

From the Engineering Report – Digital Radio Channel Plan (DRCP): Queensland document dated January 2017 a detailed analysis of overspill issues is presented and documented with the following stated in relation to the Gold Coast RA1 licence area:

“Of the 14 (measurement) locations (outside the Brisbane RA1 licence area and) solely within the Gold Coast RA1 licence area, none are classified as having overspill with the current or proposed antenna using the current thresholds. With the revised thresholds, four locations would be reclassified as currently having overspill with one location at Pimpama (no 18) being classified as having added overspill with the change from the current to the proposed antenna.”

It is critical to recognise that the Pimpama and surrounding area (as identified above) is a potentially major growth area for the Gold Coast market into the medium to long term future. Overspill of the nature proposed in the DRCP cannot be supported when one considers the Gold Coast market moving forward. The area is significant to the future growth of the Gold Coast market and when the estimates of population growth in those areas are considered against the figures provided in the DRCP the broader impact of overspill is considerable. As a consequence the “relatively small” overspill statement is in our view inaccurate if we are to consider DAB+ as a new growth technology in regional markets.

We have argued continually that the closeness of the Brisbane and Gold Coast markets presents unique issues in terms of radio listenership – allowing an overspill of the nature proposed only exacerbates an existing imbalance in the analog and digital environment.

Steps must be taken to revisit the overspill issue and reduce power to the areas mentioned in the preceding paragraphs.

**Amount of mobile overspill**

Whilst the significance of mobile overspill into the Gold Coast RA1 licence area is not seemingly a major factor from an ACMA planning perspective it was a major discussion point in the work undertaken in considering solutions or proposal prior to the release of the proposal and is a major consideration from a commercial perspective and is a major issue for Hot Tomato Broadcasting as a Gold Coast licensee.
Why is mobile overspill an issue and is it any different to fixed overspill?

Mobile overspill is a significant factor because of the increasing number of motor vehicles fitted with DAB+ tuners, coupled with the increased amount of vehicular traffic between the Gold Coast and Brisbane and return on a daily basis. The M1 Pacific Motorway which runs from the Southern section of the Gold Coast RA1 LAP and Brisbane is a major urban traffic corridor and forms part of National Highway 1.

Department of Transport and Main Roads figures reveal that in excess of 144,000 motor vehicles use the motorway between Brisbane and the Gold Coast daily.

The tables below show the impacts and why we are expressing concern and why the mobile impact cannot be ignored in considerations.

<table>
<thead>
<tr>
<th>Population above threshold within Gold Coast RA1 Licence Area</th>
<th>Mobile Current</th>
<th>Mobile Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Pattern</td>
<td>22,962</td>
<td>39,313</td>
</tr>
<tr>
<td>Proposed Pattern</td>
<td>43,953</td>
<td>74,679</td>
</tr>
<tr>
<td>Increase</td>
<td>20,991</td>
<td>35,366</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Population above threshold within Gold Coast RA1 Licence Area (km²)</th>
<th>Mobile Current (60 dBµV/m)</th>
<th>Mobile Proposed Suburban Current (70 dBµV/m)</th>
<th>Suburban Proposed (64 dBµV/m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Pattern</td>
<td>249</td>
<td>55</td>
<td>222</td>
</tr>
<tr>
<td>Proposed Pattern</td>
<td>337</td>
<td>120</td>
<td>308</td>
</tr>
<tr>
<td>Increase</td>
<td>88</td>
<td>65</td>
<td>87</td>
</tr>
</tbody>
</table>

As mentioned in previous correspondence there were 47 DAB+ radio services operating in Brisbane offering many different genres of services and more importantly offering products and services to an audience in the Gold Coast that that licence area cannot compete with. While we have mentioned the signal overspill issues previously when mobile is taken into account the figures as per the above tables speak for themselves. These are planned “overspills” and not what might be termed “unreasonable overspills”. They purposely make the overspill situation worse when steps could and should have been taken to reduce, or eliminate the problem by addressing signal strength levels in the direction of the Gold Coast. How can the ACMA stand by and facilitate making this situation worse by endorsing the proposed technical changes?
The Gold Coast DRMT that has been proposed

I note with interest that a Gold Coast DRMT has been proposed and recognise some of my comments may seem at odds with that proposal as it will, over time, address some of the issues that have been raised. I stress “over time” because it will take an estimated two years to establish the service and the Gold Coast market cannot continue to cope with the pressure put on it by Brisbane licensees into the immediate future without some recognition of a need for interim assistance. The interim assistance may be able to be addressed by timing the implementation/s (see below) but only if coupled with the steps proposed regarding reducing the overspill issues mentioned earlier.

Timing of any implementation

Again, our earlier correspondence made reference to the timing or implementation of any proposed Brisbane DAB+ services, quote:

"Whilst a preferred option of Hot Tomato is to reject the application and leave the Brisbane DAB+ specifications as they are for some time some technical compromise may still be possible with a limited increase in power that enables the Brisbane licensees to achieve some improved coverage within the licence area and not impact on the neighbouring markets.

Alternatively, the application should be placed on hold until such time as the Gold Coast licensees (in particular Hot Tomato) are able to provide our own DAB+ services in a highly competitive market – competing against up to 60 radio services is in any reasonable persons view totally unacceptable."

Despite the release of the Gold Coast DRMT I stand by those comments and am of the firm view the two areas should implement their respective services concurrently but not Brisbane before the Gold Coast and not without the changes suggested herein.

Conclusion

Should you have any questions in relation to the issues raised in this correspondence please contact Mr Graham Miles, the Group’s General Manager on 07 55192201 in the first instance.

Yours Sincerely

Hans Torv
Executive Chairman

30/11/17