Your ref: ACMA 2011/1310

To the Digital Television Licensing Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

By email: dtls@acma.gov.au

24 October 2011

Dear Sir/Madam

RE: Draft Television Licence Area Plans for regional South Australia and Broken Hill

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to comment on the Australian Communications and Media Authority’s (ACMA) Draft Television Licence Area Plans (TLAP) for regional South Australia and Broken Hill – Discussion Paper (September 2011), and the accompanying draft TLAPS for regional South Australia and Broken Hill, Engineering Report and Planning Data documents.

The ABC has the following comments specifically on the above documents:

- The ABC notes that 83% of ABC’s existing digital television services in this licence area need to be restacked, potentially affecting more than 200,000 viewers.

- In the Television Licence Area Plan for Riverland, it is noted that the Waikerie service is only planned to provide the target population with suburban level signals. As the current Waikerie service does not have this restriction, the proposal may potentially reduce the existing ABC coverage affecting some 700 viewers as a result.

- In general, the ABC notes that the channel block identified by the ACMA and the subsequent channel allotment within the block are in line with the planning principles.

- The ABC notes that ACMA’s interference predictions indicate that Block C is available for use in Burra. However, the ABC is concerned that a significant number of households may need to replace their receive antennas.

- The ABC is of the view that the restack time frame needs to be flexible and realistic. This is particularly important for sites where cascaded restacking is necessary. For example, ABC Port Lincoln cannot restack from channel 59 to channel 49 until ABC clears channel 49 in
Tumby Bay. However, ABC Tumby Bay cannot restack from channel 49 to channel 30 until Community TV Adelaide clears from channel 30. Any issue of completing restacking in time is also likely to be compounded by the uncertainties introduced by the current rollout of additional commercial television services.

- The TLAP allows the ACMA the flexibility in agreeing to make minor adjustment by up to 5 dB in effective radiated power (ERP) in the conditions on individual licences. The ABC would assume that any approved ERP increase will equitably apply to all broadcasters to ensure comparable coverage. Any cost associated with the subsequent ERP increase for the ABC service will also need to be met by the Government.

- The ABC notes some services have missing antenna horizontal radiation pattern information in the following sectors:

  - Quorn: sector 245° - 260°
  - Tumby Bay: sector 160° - 175°
  - Clare: sector 330° - 345°
  - Coffin Bay: sector 200° - 215°
  - Cowell: sector 285° - 300°
  - Kingston SE/Robe: sector 185° - 205°
  - Pinnaroo: sector 275° - 290°
  - Waikerie: sector 250° - 265°

Please do not hesitate to contact me if you would like to discuss any of the ABC’s comments in more detail.

Yours sincerely,

Adrian Potter  
Director Communications Networks