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The Manager
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Australian Communications and Media Authority
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Submissions by email  BCP@acma.gov.au


The Commercial Radio industry broadly welcomes the changes to the Exposure Draft of the Broadcasting Services Technical Planning Guidelines (draft TPG 2017) as the proposed Guidelines are in line with the industry’s request that government reduce red tape and simplify the process of starting up and operating broadcast radio services in Australia.

The proposed changes will both simplify and reduce the cost of compliance which is particularly important for AM to FM conversion and DAB+ rollout.

Whilst we understand that it is the ACMA’s aim to simplify the documentation and processes, we seek reassurance that the draft TPGs propose no significant changes to the operating parameters that are currently in place. There are a few issues that CRA has been asked to clarify in an industry response to the ACMA.

We understand that the associated TPPM document (Technical planning parameters and methods for terrestrial broadcasting 2004) is to be updated in 2017/18 and look forward to participating in the consultation process.

Specific items for clarification on the draft TPG 2017.

Guideline 6 - planned minimum field strength definition

While CRA agrees with the stated planned minimum field strength values e.g. 64dBuV/m for DAB+ and we understand that the details will be provided in the TPPM document; we suggest that it is made clear in the TPG 2017 that these field strengths are for reception at 10m not 1.5m and that this value is used for overspill assessment.

Further, CRA suggests that the minimum field strength values that are used for interference analysis (e.g. 60dBuV/m at 10m for DAB+) is also clearly stated in the forthcoming TPPM document update.
Guideline 11(4) (c & d)

It appears that the 2017 TPG specifies in this clause that the percentage of each arc specified has been increased from 60% to 70%. CRA’s engineers have request that ACMA clarify the reason for this change as it appears to be a retrospective tightening and could impact multiple existing transmissions. CRA requests that the percentage of each arc should remain at 60%.

13 Overspill criterion – transmitter not located at the nominal location

Guideline 13(2) appears to say that any transmitter which is not at the location specified in the DRCP or LAP, should not provide coverage at or above the planned minimum field strength outside the licence area which is greater than if it were located at the nominal site.

We suggest, rewording that clause to read:

(1) This guideline applies to a transmitter, other than a transmitter operated to provide a datacasting service, that is not located at the nominal location specified in the LAP or DRCP (relevant transmitter licence).

(2) The licensee of the relevant transmitter licence must ensure that the estimated population able to receive the transmitted broadcasting service outside the corresponding licence area, designated BSA radio area or narrowcasting service area does not exceed the estimated population that would be able to receive the service outside the licence area if the transmitter were located at the nominal location.

(3) No change

Guideline 14 - Overspill criterion – SFN transmitters

CRA understands that this Guideline ensures that any repeater operated in an SFN must not provide coverage outside of the licence area (or DRCP area) which exceeds the greater of the

(a) transmitter(s) specified in the DRCP, or

(b) planned minimum field strength level

If this understanding is accurate, we have no objections to this Guideline.

Guideline 21 – Maximum field strength within the licence area

CRA understands that this Guideline relates to receiver overload and is set at the same level as specified in the TPG 2007.

CRA notes that DAB+ repeaters may be located on high rise buildings and that any nearby interference or receiver overload above the levels specified in the TPG 2017 would be dealt with in response to complaints, on a case by case basis.

List of legislative instruments subject to consequential amendment

CRA understands that the consequential amendments are simple updates to cross references to supporting documents contained within the listed LAPs.
CRA requests that the ACMA confirm our understanding and provides assurance that no existing transmission will inadvertently be required to be changed as a consequence of the updating of the TPGs or the listed LAP documents.

We appreciate the opportunity to provide feedback on the revised TPG 2017 and look forward to reviewing the TPPM document when the opportunity is provided.

Yours sincerely

Joan Warner
Chief Executive Officer