10th February, 2017

The Manager
Broadcasting Carriage Policy Section
Spectrum Management Policy Branch
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

IFC 38/2016

Re: Proposed variation to the Radiocommunications (Digital Radio Channels Queensland) Plan 2007

Dear Sir

Comments in this submission relate to the specifications in the proposal to allot frequency block 9D for use by the licensee of the Gold Coast RA1 foundation DRMT category 1 licence.

Whilst being a supporter of the expansion of DAB+ radio services to regional Australia, particularly given that the metropolitan areas are relatively settled, I am extremely surprised that a service of the nature of the Gold Coast DAB+ has been proposed.

I appreciate some of the motivation to releasing something quickly may have been the upcoming Commonwealth Games. No doubt an abundance of “new streams” of digital radio services would add to the information channels for participants and visitors alike during the games. However, regardless of the motivation little thought seems to have been given to the impact the service that has been proposed on neighbouring regional markets – in particular the Murwillumbah RA1 commercial radio market.

Murwillumbah is a licence area that has, according to the current Section 30 Schedule, a population of 503,992 people.

Importantly there is a 66.12% (219,376 people) population overlap of the Murwillumbah RA1 commercial radio licence area into the Gold Coast RA1 commercial licence area.

At the same time it must be noted that there is a 27.33% population overlap of the Gold Coast RA1 commercial radio licence area into the Murwillumbah RA1 commercial licence area.

Whilst there is some acknowledgement in the proposal that there are “issues to be addressed over time” there is little evidence in the proposal that gives me any comfort in the short to medium term that the issues that I will outline later are considerations.
Issues:

Apart from a potential coverage map very little is provided in terms of technical detail.

In the consultation paper that forms part of the proposal it is stated that:

"The key issue that the ACMA has had regard to when developing the technical specifications for the Gold Coast RA1 DRMT licences, has been how to manage the potential for overspill into the following adjacent licence areas: Brisbane RA1, the Remote Commercial Radio Service North East Zone RA1 and Murwillumbah RA1 (in that part of the licence area that does not overlap with the Gold Coast RA1 licence area).

The ACMA has undertaken modelling of coverage, assuming a directional antenna (two faces of panels) located at the Mt Tamborine transmitter site, along with proposed co-channel transmitters at Brisbane South East (Darlington Range), Currumbin and Springbrook transmitter sites. Coverage modelling indicates that this arrangement will balance the interests of incumbent Gold Coast licensees with those of licensees in adjacent licence areas. The proposed arrangement is likely to provide adequate coverage for most of the Gold Coast RA1 licence area, without unreasonable overspill to adjacent licence areas. Additional co-channel transmitters may be required to target certain areas at a later date."

This is the extent of the technical information provided – which is somewhat puzzling in a paper that is proposing a new service in a market where no lower power or testing has taken place.

I accept a coverage map has been made available but few conclusions can be drawn from that map.

It is the contention of the Broadcast Operations group that if the Gold Coast DAB+ service were to operate from the Mount Tambourine site, at the specification proposed, there would be substantial overspill of the digital signal into the Murwillumbah commercial licence area.

This cannot be supported.

A digital service of the nature proposed sets a very dangerous precedent for regional area planning going forward and goes, I suppose, to accentuating issues in planning moving forward in regional areas littered with existing analogue overspill and licence area overlap issues.

In passing, I note that different power levels and protection ratios have been applied to those in metropolitan markets (i.e 5 kW in regionals), but in many cases – even the Gold Coast market in this instance, additional capex and opex costs will be needed to be expended to add co-channel transmitters to adequately cover the licence area. As a general rule, given we have now seen what happens in one market, why (as a general rule) in there a 5 kW limit?
In terms of DAB+ overspill, the associated impact on the commercial viability of neighbouring markets that do not have a complementary digital service is not an issue that the ACMA seems to ever consider. In the Gold Coast/Murwillumbah situation there are already three additional commercial services impacting on the Murwillumbah licence area, to increase the number of services by any number of additional digital services makes competition and viability in the marketplace almost impossible to compete against. An option must be placed on the table at the same time for the neighbouring market – particularly when there are overlaps of the nature that exist here.

The 219,376 Murwillumbah licence area people (that are notionally part of the Gold Coast area) form a significant impact on the sustainability and viability of the commercial licence - to have Gold Coast commercial licensees having digital services promoted, advertising and goods and services sold via that medium places the Murwillumbah commercial licence at a distinct commercial disadvantage.

I stress digital radio will no doubt be promoted widely throughout the Gold Coast if the Gold Coast DAB+ proposal proceeds. Whilst this promotion will occur both commercially and via the ABC the impact on a neighbouring market where the overlaps are as drastic as the ones mentioned earlier will, in my view, have a detrimental impact on Murwillumbah RA1.

How can this situation be remedied?

It is the view of Broadcast Operations that in situations where there is such an overlap as the Gold Coast/Murwillumbah situation planning for the areas should be conducted and released concurrently. To this end steps must be taken to immediately have a DAB+ option planned and able to be implemented for Murwillumbah RA1 to enable a level playing field.

In the absence of that complementary option or opportunity Broadcast Operations have no option but to object to the Gold Coast proposal as expressed in the draft digital channel plan.

Regards

BILL CARALIS
MANAGING DIRECTOR