Southern Cross Austereo Submission

Draft Television Licence Area Plan variation for Brisbane Melbourne and Sydney

Introduction

Southern Cross Austereo (SCA) is a regional commercial television broadcaster with licences in all states and territories of Australia except WA.

SCA welcomes the opportunity to respond to the draft variations to the Television Licence Area Plans (TLAP) for Brisbane Melbourne and Sydney posted on the ACMA website on 28 August 2013. We note the significant variation to each of these TLAPs extending Community TV (CTV) broadcast licences until 31 December 2014 and possibly beyond.

SCA Comments on the Draft Variation to the TLAP

As television broadcasting migrates out of the Digital Dividend spectrum into the Restack Spectrum SCA is concerned that the potential for co-channel interference has increased significantly. This potential has been well documented through Free TV representations to the Digital Switchover Task Force and in other forums such as the TSWG.

The CTV services in the three metropolitan licence areas broadcast on UHF in Block B. These CTV channels are co-channel with Unassigned (UA) channels in the adjacent regional areas of Bendigo, Latrobe Valley, Darling Downs, Richmond Tweed, Port Stephens, Belmont North, Warners Bay and Ulladulla.

SCA is concerned that the use of Block B in metropolitan areas by CTV could severely limit the use of the UA channel in the adjacent regional areas.

The Block Plan has one UA channel per block which has been kept clear for a range of possible future applications including broadcasters’ migration to new television broadcast technologies. If CTV services continue to use the channels currently assigned under the draft TLAP variations post Restack, the ability to use the UA channel in the regional areas mentioned could be severely limited due to the possibility of co-channel interference.

SCA suggests it is more practical and appropriate to use CH27 for Community Television Broadcasting since it is outside of the Block Plan and currently not used by Commercial and National TV broadcasters.

SCA would have no objection to the ACMA proposal only if the metropolitan CTV ERP is limited such that the use of the Block B UA channels in adjacent regional areas (Bendigo, Latrobe Valley, Darling Downs, Richmond Tweed, Port Stephens, Belmont North, Warners Bay and Ulladulla) would not be compromised or extinguished if the CTV services operate beyond 31 December 2013.

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