Your ref: ACMA 2012/539

22 October 2012

Draft Metropolitan Television Licence Area Plans
Digital Television Licensing Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

By email:
dtls@acma.gov.au

Dear Sir/Madam,

Draft Metropolitan Television Licence Area Plans

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to comment on the following documents released for comment by the Australian Communications and Media Authority (ACMA):

2. Draft Television Licence Area Plan (Adelaide) 2012
3. Planning Data Adelaide TV1 – September 2012
5. Draft Television Licence Area Plan (Brisbane) 2012
6. Planning Data Brisbane TV1 – September 2012
8. Draft Television Licence Area Plan (Melbourne) 2012
9. Planning Data Melbourne TV1 – September 2012
11. Draft Television Licence Area Plan (Perth) 2012
14. Draft Television Licence Area Plan (Sydney) 2012
15. Planning Data Sydney TV1 – September 2012
The ABC has the following comments as feedback for further revisions of the documents above:

Adelaide

- Only the ABC and SBS are currently operating at Elizabeth South and the ABC is not in favour of this service being in an SFN with other services. The ABC has undertaken desktop analysis and conducted field tests of the digital television coverage in the area served by Elizabeth South, and has concluded that there are no areas where the Elizabeth South service provides better coverage than the Adelaide service or the Craigmore/Hillbank service.

- The ABC supports Broadcast Australia’s (BA) recommendation for a revised horizontal radiation pattern (HRP) for Adelaide Foothills.

Brisbane

- The ABC notes the proposed HRP envelope for Esk is not consistent with the current antenna pattern. The proposed HRP envelope has been shifted clockwise by approximately 55° from the existing HRP. The ABC would like to seek ACMA’s clarification on the discrepancy as the proposed HRP envelope will adversely affect our existing coverage.

- The ABC does not agree with the rationale provided by the ACMA for the allotment of Block C channels for the commercial broadcasters in Currumbin, and Block E for the national broadcasters. The proposed channel allotment for Currumbin is not consistent with Planning Principle 6. The ABC is of the view that the rationale for deviation from Planning Principle 6 is not sound: there is no reason for the incumbent broadcaster on channel 36 (SBS) to be moved and the ABC should be allotted the channel next to SBS (channel 37). This would put ABC and SBS channels on Block C rather than on Block E.

- The ABC notes ACMA’s proposal of ABC and SBS operating additional services on the Sunshine Coast Metropolitan antenna pattern is to improve reception options between Brisbane and Wide Bay. The ABC supports this proposal, subject to government funding.

Melbourne

- The ABC supports BA’s recommendation for a revised HRP for Ferntree Gully, Safety Beach, Selby, South Yarra and Warburton.

- The ABC has concerns about the ACMA’s proposal for the ABC to operate in a large SFN in this market with two self-helps. This large SFN of the ABC services of Rosebud, Safety Beach, South Yarra, Ferntree Gully and the two self-helps in Ocean Grove and Melbourne Inner Suburbs would be difficult to manage. The ABC’s view is that the Ocean Grove and Geelong self-helps should be placed in a separate SFN.

- The ABC notes that Warburton and Marysville are currently operating in SFN. The ABC would like to seek ACMA’s clarification on why these two services can co-channel after the restack without interference.
Perth

- The ABC has implemented a digital-only service at Mandurah/Waroona in August to improve coverage for viewers who have reception issues from either Perth or Bunbury. The ABC is concerned the proposed Mandurah/Singleton services do not include the National services and that viewers tuning to this site will not be able to obtain adequate reception of ABC digital television services. The ABC looks forward to reviewing commercial broadcasters’ analysis on the rationale for National services not being included at this site.

- The ABC supports BA’s recommendation for a revised HRP and ERP for Toodyay.

Sydney

- The ABC supports BA’s recommendation for a revised HRP for Boodi and Manly/Mosman.

- The ABC supports BA’s recommendation for a revised ERP for Sydney.

- The ABC supports the proposed ERP increase for Gosford, subject to government funding.

- The ABC notes that Sydney North West self-helps are proposed to SFN with Kings Cross and Manly/Mosman and Sydney South West self-helps may need to SFN with Boodi and Wyong. The ABC reiterates its concerns on SFN operation of self-helps with existing ABC services as this would have potential to impact on the existing ABC coverage and impede on the flexibility to operate our services independently.

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 L Potter
Director, Communications Networks