The Australian Communication and Media Authority

RF: Submission to the draft metropolitan TLAPs

22 October 2012

To whom it may concern

West TV Ltd, channel 44 Perth would like to clarify our position and our recommended pathway to continue our service after the analogue transmission turn off and subsequent channel re-stacking.

After reading the proposed allocation documents, we see as a result of the ACMA allocation of the interim frequency channel 32 (557.5 Mhz), WTV Perth can continue transmission as is, with no immediate action required by West TV and our transmission providers IX Australia.

We understand that a viable solution must be put in place for us to maintain our CTV service by the end of the digital re-stacking timeframe and/or the allocation of the unallocated frequency channel 10, the only remaining frequency post-stack.

West TV Ltd believes the best approach to continue transmission services is by distributing the WTV service via the 4th allocated channel on the SBS transmission systems. Amongst other things this will:

- achieve the outcome of fair and equal transmission coverage of WTV compared to other free to air TV network providers;
- ensure a much more sustainable future for the Community TV sector in the heavy reduction of transmission expenses;
- allow West TV Ltd the technical access for statewide transmission access if the full MUX of channels on the SBS distribution systems is delivered to each transmitter location;

In proposing this, we understand that in making this agreement or before approaching SBS to begin feasibility work, West TV would need to clarify several technical specifications and possibly engineer solutions that would fit in to the SBS distribution network. We understand that the bandwidth allocation to the SBS network would increase after the restack to frequency channel 7. It is most important that the West TV service is allocated sufficient bandwidth to allow for an equal, if not better picture quality.
Several other factors that need to be taken into consideration:

- whether or not the service is provided as MPEG2 or the newer MPEG4/H.264.
- if the service is provided as MPEG4/H.264 standard, whether we are permitted to feed a high definition signal to the encoding hardware and subsequently to the public (as MPEG4/H.264 decoding needs a newer HD decoder).
- location of the WTV feed head-end hop off point that will allow for SBS network wide distribution to all Western Australia transmission locations.
- SDI signal encoding at the WTV Studies or fed to SBS’s main distribution site.
- Possible alteration in West TV’s Telstra DVN, location A to location B feed:
  - change location B hop off point to suit the SBS network distribution injection point, or,
  - modify the A to B link to terminate onto the Telstra DVN Swish network.

With Perth being the most isolated and remote City in Australia, West TV Ltd welcomes the possibility and responsibility of expanding our service coverage to not only the greater Perth area, but access the remote regions of Western Australia.

Another considering factor to add to the timely planning of WTV’s future, is that several head end distribution systems will most likely only be tuned once and once only. If West TV’s final solution is not settled with our long term frequency allocated, whether it be on the unallocated frequency channel 10 or via the SBS network distribution solution, West TV will be left marooned on frequency 32 leaving an alarming amount of the public without access to the WTV service.

We hope the ACMA and the Digital Transition Division will take our comments and preferred proposed solution into account. We are happy to proceed to the consultation, feasibility and development stage as soon as possible.

Yours sincerely,

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