Dear Sir/Madam,

Draft Northern NSW Television Licence Area Plan

The ABC welcomes the opportunity to provide comment on the Draft Northern NSW Television Licence Area Plan. We have reviewed the following documents:

- Television Licence Area Plan (Northern New South Wales) 2012
- Planning Data: Northern NSW TV1
- Draft television licence area plan for Northern New South Wales and draft variations to the digital channel plans for Northern New South Wales and Brisbane – Discussion paper
- Engineering report – Restack channel planning – Northern New South Wales.

Upper Namoi

The ABC’s has received evidence of interference on the fringes of Darling Downs coverage on the ABC service operating on channel 37. This is due to ducting from the NBN Upper Namoi service that is also operating on channel 37. After restack, the ACMA has proposed for the ABC to be assigned channel 29 at both Darling Downs and Upper Namoi. The ABC is concerned that the interference will continue under this scenario, and requests the ACMA allots Upper Namoi on a different Block.

The ABC’s current digital television service for the Upper Namoi operates at 55kW ERP on channel 8. The ABC does not agree with the ACMA’s proposal to limit the restack ERP to 150kW, as this would have an adverse impact on reception for the ABC’s audience when the service restacks to channel 29 (or to another channel in the UHF Band). The ABC requires the Upper Namoi service to operate on at least 220kW ERP to maintain the same level of coverage if the service restacks to Block B, or higher if it restacks to Blocks C, D or E.

Walcha

The ABC notes that the ACMA has allotted channel 45 to the ABC rather than channel 41 in accordance with Planning Principle 6. While the ABC notes that this is ostensibly from a desire to avoid the timing constraint that would apply to restacking Walcha as a result of the current NRN41 service at Armidale, the ABC is of the view that allotting channel 41 to the ABC is preferable, and a timing constraint on the Walcha restack should not prevent ABC being allotted channel 41.
Ashford

The ABC is currently operating its service at Ashford at 75W ERP. The ABC does not support the ACMA’s proposal to reduce the ERP of the Ashford service to 50W.

Upper Hunter

The ABC is currently occupying channel 7 in the Upper Hunter, together with NBN on channel 9. The ABC is not in favour of a restack to Block E for the Upper Hunter, and would prefer Block A be used for this site. The ABC notes that there is no engineering rationale provided by the ACMA that would preclude the use of Block A in the Upper Hunter.

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
Australian Broadcasting Corporation