



LOFTY COMMUNITY MEDIA

LOFTY 88.9 FM  
ADELAIDE HILLS COMMUNITY RADIO

FOLLOW-UP SUBMISSION TO THE ACMA

23 JUNE 2020

## TABLE OF CONTENTS

<b>APPLICABLE REFERENCES</b>	<b>3</b>
<b>LOFTY - VOLUNTEER BASE</b>	<b>4</b>
<b>LOFTY PROGRAMMING SCHEDULE</b>	<b>5</b>
<b>PROGRAMMING TABLE (TRANSCRIPTION ERROR)</b>	<b>6</b>
<b>LOFTY COMMUNITY ENGAGEMENT</b>	<b>7</b>
Lofty’s Specialised Community Programs	7
Lofty’s community engagement themes	7
Lofty’s community engagement services	7
Community engagement model	8
Engaging focus groups	9
Lofty directly engages with the community	9
Successful community engagement partnering	10
Long-term community partnering with Lofty - examples	10
Lofty’s High Schools community Engagement	10
Lofty’s Youth Led Radio community engagement	11
We’ve got news for you!	11
The Cheese factory Studio and Gallery Meadows	11
Hills Football League (HFL)	12
Adelaide Hills Kiwanis (Service Club)	12
Lofty’s remote (outside) community engagement broadcasting services	12
Mount Lofty Districts Historical Society (MLDHS)	13
Adelaide Hills bushfire emergency 2019	14
COVID-19 Pandemic	14
Adelaide Hills major event – ‘In the Raw’ Festival	14
Cultural engagement	14
<b>FUNDING</b>	<b>15</b>
Low-cost operating model.	15
Current costs and funding	15
Lofty - interim funding	16
<b>FUNDING SOURCES PLEDGED TO LOFTY (CONFIDENTIAL)</b>	<b>17</b>
Lofty potential sponsors	17
Pledged sponsors	17
Potential funding - summary	17
<b>LOFTY TRANSMITTER SITE DETAILS</b>	<b>18</b>
Transmitter sites considerations	18
Summary	18

## **Applicable References**

- A. Lofty Business Plan
- B. Lofty Plan on a Page 2020-22
- C. Lofty Constitution (2017)
- D. Lofty Prospectus (2020)
- E. ACMA Community Broadcasting Licence Application (2019)

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## Lofty - Volunteer Base

**ACMA Q.** “Please confirm the current total number of members, volunteers and presenters at Lofty”.

### **LOFTY RESPONSE:**

Lofty Membership and Presenters as at 15 June 2020:

*(Note: All members of Lofty are currently volunteers – future intention is to fund 2-4 paid part time positions when funding permits)*

- Number of Members: 36 (not including 11 Pending) (i.e. total of 47) as follows:
- Board: 7 (Burgess, Goldfinch, Lyons, Thorne, Cleggett, B. Campbell, Vrabec)
- Op Exec: 2 (L. Campbell, Sander)
- Office Members: 3
- Working Members: 23
- New members in processing: 11 (including 4 x new presenters)
- Social media subscribers: over 700 (increasing at approximately 30-50/month)

\* Trained presenters available: 24

\* New presenters (under training): 5

[REDACTED]

## Lofty Programming Schedule

**ACMA Q:** “Please review Lofty’s responses to questions 9 and 10 in the application and confirm that the numbers provided are correct or provide the correct numbers if they are incorrect”.

### **LOFTY RESPONSE/QUESTION 9:**

- From the proposed (Appendix 9) sample program schedule and detailed program intentions (Appendix 10), the following (corrected) information for that sample week is as follows:

	HOURS	
	SPOKEN WORD	MUSIC
PRE-RECORDED LOCALLY PRODUCED (within the licence area)	0	4
LIVE-TO-AIR LOCALLY PRODUCED (within the licence area)	46.5	31
AUSTRALIAN PRODUCED (produced in Australia, outside the licence area)	8.5	6
OVERSEAS PRODUCED (anywhere overseas)	9	6
Sub-Total	64	47
SUB-TOTAL	<b>111</b>	
ADD PLAYOUT MUSIC (INCLUDES 36HRS OVERNIGHT)	57	
TOTAL HOURS	168	

- Number of presenters proposed to be on air in a typical week:
  - NUMBER OF LIVE PRESENTING SESSIONS IN THE SAMPLE WEEK: 42
  - NUMBER OF DIFFERENT PRESENTERS REQUIRED FOR THE SAMPLE WEEK: 34

### **LOFTY RESPONSE/QUESTION 10:**

- From the proposed program schedule, provide the following information for that sample week:

MATERIAL OF LOCAL SIGNIFICANCE (MLS)	NUMBER OF HOURS
MLS HOSTED AND PRODUCED IN THE LICENCE AREA	81.5
MLS HOSTED BUT NOT PRODUCED IN THE LICENCE AREA	14.5
MLS PRODUCED BUT NOT HOSTED IN THE LICENCE AREA	0
MLS AUSTRALIAN PRODUCED MATERIAL THAT RELATES TO THE LICENCE AREA*	8.5
MLS OVERSEAS PRODUCED MATERIAL THAT RELATES TO THE LICENCE AREA*	9.0

\* Material could relate to the licence area if, for example, it relates to a person, community organisation or event in the licence area, or if it relates to a social, economic, political or cultural issue as it affects the licence area (either in the sense of the geographic area or a community within the licence area).

- Note: The total number of hours included in this weekly sample for third party programs from CRN and other sources are as follows:
  - CRN: 14.5 hours
  - Other: 15.0 hours

## PROGRAMMING TABLE (TRANSCRIPTION ERROR)

**ACMA Q:** *“If the numbers provided in Lofty’s answers to questions 9 and 10 in the application are correct, please clarify how 65 hours of programming on Lofty’s proposed schedule is classified as produced but not hosted in licence area”.*

**LOFTY RESPONSE:**

- The figures were transcribed incorrectly. Lofty does not produce programs that are classified as *“produced but not hosted in licence area”*.
- A full audit of the sample week program has been conducted, and the corrected numbers are as per the above response.
- Following the full audit of the sample week, including further due diligence on the application of the term *‘material of local significance’*, the figures were finalised as shown.
- We apologise for this error.

## LOFTY COMMUNITY ENGAGEMENT

**ACMA Q.** “Please provide further explanation about how Lofty intends to commission its own surveys, run focus groups, and adopt additional mechanisms to facilitate audience and community feedback in the future, particularly noting its current finances”.

### LOFTY RESPONSE:

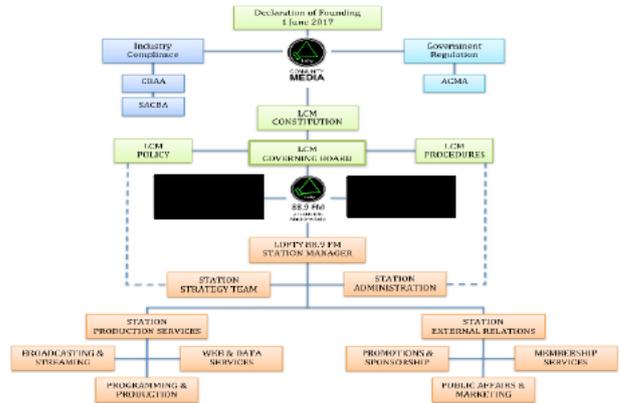
#### Lofty’s Specialised Community Programs

Key features of Lofty’s community engagement strategy are [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**Note:**

In regard to Lofty’s ability to financially facilitate and sustain our community engagement plan and activities, Lofty is not aware of any financial constraints, perceived or otherwise, to our ability to deliver our current or planned community engagement activities.

As will be seen in the following paragraphs, Lofty is actively and directly engaged in significant community-building engagement activities. The community engagement projects have depth, meaning and longevity across the community. Lofty’s community activities range from small groups [REDACTED] to very large associations with thousands of members (e.g. Hills Football League – [REDACTED]). They also range from schools to important community services [REDACTED] and service clubs (e.g. Kiwanis).

#### Lofty’s community engagement themes

Our community engagement themes involve:

- **supporting and building** local community services and cultural events across the Hills
- **building** community radio awareness with, and for, young people across the Adelaide Hills
- **connecting and promoting** creative people and communities across the Adelaide Hills
- **supporting and enhancing** music arts, venues and community-building activities in the Hills

#### Lofty’s community engagement services

The principal service offered by Lofty is of course our public community-based radio broadcasting service. **Lofty, however, is much more than ‘just a community radio station’** – we are a true not-for-profit, multi-channel, community media enterprise. In that respect, the services we offer to the local community organisations goes far and beyond ‘just the radio station’.

In that regard, the range of our professional expertise and experience within our leadership group is **no accident**.

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Lofty's in-house professional experience and expertise, other than directly for community radio, includes, but is not limited to:

- creating community cross-pollination and collaboration opportunities (due to the knowledge we gain from being a common point of contact for people, organisations and activities across the Hills communities)
- specialist event design, organisation and management support
- specialist event marketing and public promotion guidance and support
- community service organisation event and other collaborative activity planning assistance
- IT, audio and other technical assistance with public activities
- online social media access and assistance

**Note:**

*By directly partnering and sitting with the community organisations and activities in a wider and more meaningful way than just promoting events via radio, Lofty links directly into the community with an enhanced level of reach than trying to determine, independently, what the community wants from their community radio and, how they feel about the way we are delivering that product!*

*This approach is innovative to some, but the quality of the results and the long-term trust and relationships this approach generates is invaluable. Generally, our engagement support costs to Lofty are 'little to nothing' and, often, results in donations and in-kind support back to Lofty.*

*It is the 'win-win' outcome we aim for and, we are achieving that with some great results – and particularly so [REDACTED].*

**Community engagement model**

The Lofty leadership group's community engagement model is predicated on [REDACTED]

Engagement and establishment of partnering with the community is achieved by:

- (1) *direct contact with community groups through well established networking links and opportunities,*
- (2) *making Lofty as accessible as possible for people and organisations to engage with us,*
- (3) *knowing what community organisations and activities are active within our region and, understanding their aims and aspirations for the community through their activities,*
- (4) *gaining the trust and respect of these organisations through honest and collegiate engagement in determining the best way to assist their community aims and aspirations, and by*
- (5) *offering more than just access to our community radio broadcasting service, but also the wider access to Lofty's in-house expertise as a not-for-profit multi-channel community media organisation.*



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**Social Media.** We make very extensive use of Internet and social media portals for direct community interaction and feedback and to promote brand awareness by:

- promoting Lofty and Lofty’s services via online forums and websites (our reach on one very recent engagement has reached a staggering [REDACTED] people and logged over [REDACTED] engagements, over 800 comments and more than 1300 shares!),
- engaging with a wide range of local community groups via many online open and closed social media groups we subscribe to,
- engaging with the wider radio industry [REDACTED] [REDACTED] to maintain awareness of the wider industry.
- the use of SurveyMonkey (in the main) to conduct online surveys when required (for which we hold a paid subscription).



**Successful community engagement partnering**

As far as possible, Lofty always seeks to ‘value-add’ in collaborating with our local community.

[REDACTED]

Internally of Lofty, our two community engagement programs are overseen as follows:

- **Community collaboration program.** This program focuses on a wide range of general community needs. [REDACTED]
- **Music/Arts collaboration program.** The focus of this program is on the role of the creative and performing arts within the community. [REDACTED]
- **Note: Technical assistance,** including direct support to locally produced programs for broadcast, both live-to-air as well as pre-recorded shows and podcasts across both programs group is supported internally of Lofty by mostly, but not exclusively, Tony Sander, Geoff Cleggett, Al Thorne, [REDACTED] and Lindsay Campbell.

**Long-term community partnering with Lofty - examples**

Lofty has successfully established some significant collaborative partnering agreements with several high-profile community organisations. The following paragraphs provide an overview of the innovative and successful community engagement programs Lofty has implemented based on feedback from our community research.

**Lofty’s High Schools community Engagement**

Lofty has begun to develop on-going relationships with local high schools through a specially designed community radio training program for High School Students. [REDACTED]

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The radio shows now going to air as a result of this program are currently as follows:

- the 'Kym and Isaac Hour' each Friday at 4pm,
- 'Cool Beans' with Harry 4pm Tuesday,
- 'Music with Maddi', 1pm Wednesday, and
- 'Historical Chicken' [REDACTED]

### Lofty's Youth Led Radio community engagement

In conjunction with the Adelaide Hills Vocational College in Mt Barker, Bridie Campbell will be helping to lead and teach year 11 and 12 students in the art of planning, writing, producing and presenting a Youth Led Radio show for the subject Community Studies. This will be both on campus and within the studio. This subject will commence in Term 3, 2020 and will count towards the students SACE points.

### We've got news for you!

'We've got news for you!' is one of Lofty's flagship direct community radio engagement. Broadcast live every Monday at 10am with Tanya Lyons. The program provides opportunity for Community engagement through face-to-face interviews with interesting and relevant community members. For example, recent guests have included Angela Duigan from the Disability Advocacy Group; Toni Hanna from Strathalbyn Counselling regarding disability; Steve Weston - local Author; Andy Joyner local - author and book illustrator; Trevor Fletcher - School Principal EFS; A local Astrophysicist; A local seismologist; a local hills cabaret performer; a visiting Irish band - the Ocelots; a visiting American blues guitarist - Ivan Applerouth; Macclesfield local potters association; Adelaide Hills Art Collective – Annie; and, Macclesfield Young at Heart Club - Cathy; to name just a few examples of the community guests hosted live on Lofty.

### The Cheese factory Studio and Gallery Meadows

The Cheese factory Studio and Gallery at Meadows is a partnering arrangement with Lofty that we believe is **unique in regard to any radio station – community or commercial – anywhere in our region.**

Through this community engagement partnering arrangement, [REDACTED], Lofty directly supports local Adelaide Hills community music arts through the provision of a live music venue and recording opportunity for local artists to be interviewed and make recorded public performances for featuring on Lofty Community Radio. Additionally, through Lofty's wider community media services, the interviews and recorded gigs are widely shared via our established Internet streaming and social media channels.



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### Hills Football League (HFL)

The HFL, next to netball, is probably the largest community activity within the Adelaide Hills region. With 20 clubs, 60 senior teams, about 3000 players and well-over 7000 family and local football supporters, the HFL is grass-roots Australian community at its best – **and Lofty has already locked in this partnering agreement and secured the rights to broadcast the ‘match of the day’**

– see more here:

[http://www.hillsfooty.com/?page\\_id=68](http://www.hillsfooty.com/?page_id=68)

Lofty members Tony Sander, Ben Goldfinch and Jeff Pistola were directly involved in establishing the HFL Media ‘Dream Team’, and their signature radio program ‘Call of the Wild’. All three continue to remain a central part of this activity. In 2018, Lofty was awarded a ‘runner up’ Bilby by SACBA for ‘best coverage of a Sporting Event’ for ‘Call of the Wild’.



**Note:** Lofty continues to seek a 50/50 equity split of broadcast time as per our submission addendum in November 2019. In particular, we seek allocation of the Saturday PM hours time slot in order to support the HFL coverage.

### Adelaide Hills Kiwanis (Service Club)

Lofty has established a long-term partnering association with the Adelaide Hills Kiwanis service club. Kiwanis work with another 15 community service organisations operating across the Adelaide Hills which **Lofty now has direct access to through Kiwanis**. Kiwanis have sought to establish a fortnightly 1-2 hour talkback program on Lofty focussing on the community work of all sixteen (16) community service clubs (one at a time). The intention is for a light-hearted interview/discussion on the work of each club, where they operate and whom they support. Each program will involve personnel from the club in focus, for that particular program.

### Lofty’s remote (outside) community engagement broadcasting services

**Remote (outside) broadcast studio.** Lofty’s state of the art remote community engagement broadcasting capabilities will not only be simple and effective, but also very low-cost and highly mobile. Whether it is on the spot recorded interviews, podcast capture, or direct outside broadcasting, Lofty has researched the best balance of high-quality, cost-effective and flexible audio capture, recording and live transmission solutions available. Our solutions, in effect, are state of the art and so flexible, we can carry in a brief case! The outside ‘phonebox’ live broadcast unit even includes the built mobile telephone technology to link into our studio and our transmission train.



At \$1500 to purchase (Elan Mk-5 Phonebox), and about \$2/hour for mobile access (when required), it is a full-quality, highly flexible and very low cost way to set up live broadcasts anywhere, anytime

. That said, for ‘passenger comfort’ and visual impact, Lofty has also secured a fit-for-purpose caravan to provide that higher level of amenity for our presenters and guests. With the on-going costs of registration and insurance at



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approximately \$250 per year, this is a further example of Lofty’s innovative approach to practical operating cost reduction.

We already have most of the equipment for this project, however, the CV19 situation has had some impact on our planning, as has the continuing uncertainty of the licence tenure. The RBS will feature the Elan Mk5 Phonebox to conduct live field interview and transmit back to the studio via wireless phone network. Within the master studio, the new RODECaster pro audio mixing desk with direct Bluetooth mobile phone connection, will integrate the remote broadcast feed directly into our playout and transmission system for broadcasting and streaming.

**On the spot interviews and podcasting.** Lofty has just recently acquired access to the latest hand-held Zoom H4n audio recorder. Rugged and designed to ‘travel anywhere’, it is the current ‘gold standard’ for high-quality portable recording. Fitted with its shot-mic, the employment of this technology underscores Lofty’s commitment to dramatically increasing its community engagement capabilities.



### Mount Lofty Districts Historical Society (MLDHS)

Lofty is working with The Mount Lofty Districts Historical Society (MLDHS), which is a highly respected Adelaide Hills historical society that has operated for a great number of years. The MLDHS has many high-profile local backers and supporters, and the leadership group of MLDHS includes both retired and current academic, professional, business and local persons with extensive network connections throughout the Adelaide Hills.

The MLDHS works closely with both Hills councils, focussing on research and promotion of Adelaide Hills history via a strong theme of **education** in collaboration with Adelaide Hills schools.

The MLDHS regularly mount exhibitions and displays in the excellent Stirling (main town of the Adelaide Hills Council Area) Library facility and, in 2019, Lofty partnered with the MLDHS to support their activities.

The first project supported by Lofty with the MLDHS is a major historical display planned for the whole of the month of August 2020.

While the COVID-19 situation has effected planning, Lofty has worked on with the MLDHS leadership group to assist them to deliver their historical educational display – which will feature:

- a working ‘pop-up’ radio station,
- a ‘school of the air’ working demonstration, and
- an historical radio display.

Partnering with this group to assist them with their activities, via access to a wider range of Lofty’s community media services, has already generated feedback to establish both a monthly history show on Lofty, but also generated new interest in working to develop the concept of pop-up radio (streaming to the net) for local schools.

In this way, Lofty seeks to establish stable long-term growth with community organisations. The high **quantity** of outside broadcasts claimed by some stations as examples of substantial ‘community engagement’, in Lofty’s view, does not reflect the quality or depth of engagement that community organisations really need from community radio.

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## Adelaide Hills bushfire emergency 2019

During the recent devastating Cuddle Creek bushfire emergency, and at time of great need for our Hills Community, Lofty was right there directly supporting our community 24/7. With the massive bushfires on our doorstep, Lofty established an on-going broadcasting update service of the fire situation – this service was maintained for over two weeks on-air and online, as well as through our social media channels.

## COVID-19 Pandemic

The COVID-19 pandemic is a situation, the extent of which, none of could really imagine. Medically, psychologically and financially, the pandemic has touched every nook and cranny of our community. Lofty has worked hard to provide a positive and uplifting sound into the heart of our community.

We have ensured that local, state and national government announcements have been aired on a regular basis for free as part of our commitment to community health and safety, and we have also created – through our ‘Youth-Led Radio’ training program a range of less formal – but no less serious - community service announcements that are regularly aired.”

## Adelaide Hills major event – ‘In the Raw’ Festival

The Adelaide Hills ‘In the Raw’ (ITR) Health & Wellbeing Festival – held bi-annually (although not this year due to COVID-19) is a major Hills community not-for profit event that attracts over 2000 patrons. Lofty has partnered with ITR as their media sponsor. ITR provides excellent positive and public exposure for Lofty due to its themes around mental, physical, emotional and spiritual health, and, lifestyle wellbeing through music, sport and recreation.

Significantly, Lofty’s involvement with ITR has had positive exposure and further enquiries for Lofty to support other Hills community events.

## Cultural engagement

Lofty prides itself on being an inclusive and supportive community activity. Within the Adelaide Hills, we have an amazing cross-section of people and cultures from across the world.

There are many specialist cultural events in the Hills, Lofty continues to engage and seek partnering opportunities with the organisers of these events as COVID-19 restrictions ease.

However, we take great pride in the support Lofty is able to offer our Indigenous, First Nations People, and in particular our local Peramangk People.

Lofty works with local Peramangk elders to help integrate and facilitate the changing nature of the appreciation of Aboriginal culture into everyday Australian life – and we assist the delivery of that message and the cementing of elements, such as ‘welcome to country’ as normal Australian daily culture. The development of a local Indigenous radio program on Lofty is also very high on our agenda, and as COVID-19 restrictions ease, we will restart our work to achieve this goal.



## FUNDING

**ACMA Q:** “At the meeting, you explained that Lofty was ‘self-funding’. Please provide more information about the source and amount of self-funding that Lofty has access to”.

**LOFTY RESPONSE: (CONFIDENTIAL)**

### Low-cost operating model.

Lofty is specifically designed as a very low-cost operating model. Available funds are allocated, in the first instance, to assure our baseline operation is maintained. Operational cost lines are as follows:

- (1) Studio and studio outgoings
- (2) Studio systems and equipment maintenance
- (3) Professional copy to air editing and website editing
- (4) Community engagement, event hosting and support
- (5) Special venue use for meetings, live music concerts and music recording and editing

### Current costs and funding

Currently, our primary costs (items (1) to (3)) are approximately [REDACTED] per year. These costs are met by in-kind sponsorship as follows:

(1) **Studio and studio outgoings** [REDACTED]

(2) **Studio systems and equipment maintenance** [REDACTED]. The technical systems (hardware and software) supporting Lofty’s technical solution are all currently covered by a range of ‘in-kind’ support, donations and other sponsorship arrangements as follows:

- a. Loaned equipment from the South Australia Community Broadcasting Association (SACBA) via Mr Tim Borgas.
- b. External in-kind technical support via Mr Tim Borgas (SACBA) and Mr Chris Doe (Tribe FM).
- c. Loan of surplus to requirement equipment from Tribe FM and Triple R FM.
- d. Donated equipment (in particular computers) – many donors.
- e. Hosting of Lofty transmitter and antenna - In-kind (and on-going) sponsorship arrangement by Mr Geoff Cleggett (Lofty Board Member).

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- f. Software purchases and subscriptions and, power cost for the transmitter site – [REDACTED]  
[REDACTED].
- g. [REDACTED] academic and professional copy-to-air and website editing – [REDACTED]  
[REDACTED].
- h. Use of [REDACTED] for event hosting and accommodation – [REDACTED]  
[REDACTED].

(3) **Community engagement projects.** Funding for Lofty’s current community engagement projects is primarily on a barter system. However, from time to time, donations from supported clients are offered (and gratefully accepted) on a case-by-case basis. [REDACTED]  
[REDACTED]

(4) **The Cheese factory Studio and Gallery Meadows.** The Cheese Factory, annually and in partnership with Lofty, provides a live venue for music and meetings, plus music recordings and recording facilities in support of Lofty’s music arts program for the Adelaide Hills. [REDACTED]  
[REDACTED]  
[REDACTED]

### Lofty - interim funding

Lofty is fortunate to enjoy significant public awareness and support in the very short time it has been operating. This is generating good sponsorship interest, but for the reasons explained later, we are not actively pursuing or accepting any significant sponsorship offers for the immediate short term.

Because of the two factors of an **unconfirmed broadcasting tenure** and the effects of the **COVID-19 pandemic**, the leadership group of Lofty firstly reassessed its funding situation in November 2019 when it was expected that a decision about broadcasting tenure would likely be settled by April 2020.

The decision of the board at that time, given the approaching Christmas break as well, was to not to seek substantial sponsorship funding in light of (1) the level of already-available in-kind support, and (2) the lack of apparent return (due to the unsureness of broadcasting tenure) that Lofty might reasonably be able to offer sponsors.

Due to the severe impact of the Bush Fires in South Australia, and Nationally, and the drain on the community in terms of fundraising for bushfire affected, people, communities and animals, a small membership drive was conducted in February 2020 but we did not expect to gain many new members. However, many new listeners congratulated us on our broadcasts and social media engagement during the crisis and we do have eleven pending applicants nonetheless.

Since the onset of the pandemic, and a further extension of the TCBL window to 30 September, Lofty, and its current sponsors, have considered the position and agreed to continue the current arrangements.

Lofty is, however, not without paying sponsors. Any such sponsors are small [REDACTED] [REDACTED] and on a month-by-month tenure to ensure we comply with the CBAA guiding principles and codes of practice in regard to signing sponsors past TCBL dates.

Currently, Lofty has one regular sponsor [REDACTED] [REDACTED]. They have indicated strong support for continuing to sponsor Lofty, and were happy to do so on the month-by-month basis necessary to remain compliant with community radio sponsorship guidelines.

**FUNDING SOURCES PLEDGED TO LOFTY (CONFIDENTIAL)**

**ACMA Q:** At the meeting, you explained that Lofty had potential sponsors who were willing to spend a significant amount of money. Please provide more information about the potential sponsors including the amount of sponsorship income that Lofty expects to receive from these sponsors if the application is successful.

**LOFTY RESPONSE: (CONFIDENTIAL)**

**Lofty potential sponsors**

If Lofty is granted a full broadcasting licence, we are in a strong and stable financial position to move forward – and particularly into a 24/7 broadcasting licence.

With our financial situation for the operation of the enterprise assured, and with the certainty of tenure in respect of a broadcasting licence confirmed, particularly if we have either 3.5 days/week including Saturday PM, or 24/7, Lofty will be able to take advantage of current pledged and other sponsorship options as outlined below. Additionally, with at least similar or full access to the current level of general sponsorship for community radio that may become available, there is no reason to expect Lofty would not gain at least 50% of that current offering.

**Pledged sponsors**

Post 30 September, the pledged or otherwise available sponsors whom Lofty can realise are as follows:

- [REDACTED]
- [REDACTED]
  - [REDACTED]
  - [REDACTED]
- [REDACTED]
- HFL [REDACTED]
- Kiwanis [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**Potential funding - summary**

On a 24/7 operation, Lofty can realise an annual income of [REDACTED]. As our annual operating costs are [REDACTED] – this should realise an [REDACTED]. It is anticipated that as the station grows, up to 3-4 part time paid staff will be required to provide the level of day today service that a higher tempo operation will generate.

*ACMA – Follow up submission*

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## LOFTY TRANSMITTER SITE DETAILS

**ACMA Q:** Please review Appendix 16 of the application and confirm the proposed transmitter site and technical specifications and advise us if you wish to amend those details.

### **LOFTY RESPONSE:**

#### **Transmitter sites considerations**

Lofty notes that SL1180024 lists **ACMA Site ID 23171** (i.e. Hill Radio's current transmitter (TX) site located at RAA District Council Site, Old Mount Barker Road, ECHUNGA SA 5153, and at the nominal coordinates of -35.101159°, 138.813272°) as the TX site for 88.9 FM.

Lofty's current actual transmitter site for 88.9 FM, however, **ACMA Site ID 305178** (i.e. Cleggett Farm, Cleggett Road LITTLEHAMPTON SA 5250, and at the nominal coordinates of -35.049606°, 138.85328°

Lofty is unsure if ACMA intends that the operator granted the licence for 88.9 FM is required to use only site 23171?

Whilst Lofty has no issue with relocating our TX infrastructure to Site ID 23171, if that is a condition for the grant of the licence, Lofty believes that our current site (ACMA Site ID 305178) offers several major advantages over Site ID 23171, as explained in our original Appendix 16 application.

While both sites exceed Section 21.(2) of the Broadcast Services (Technical Planning) Guidelines 2017 viz. field strength > 110 dBµV/m to > 1% of the licence area's population, Site ID 305178, we believe, is significantly closer to meeting Section 21.(2) than Site ID 23171.

There are other advantages also for maintaining our current (#305178) site, including ease of access, direct line of sight from our studio, and expected site upgrade in the very near future with a new transmitter hut and other improvements.

#### **Summary**

Lofty has reviewed Appendix 16. Our preference, should Lofty be granted the licence, is to continue to use Site ID 305178 for the reasons stated with our original application.

Lofty will, however, relocate to Site ID 23171 if that were to be a condition for the grant of a full licence.

Two sets of data (one for each site) were included in the original application to reflect Lofty's preference (for Site 305178) or, if we are required to relocate, Lofty's research and understanding of site 23171, should that be the option we will be required to follow.