



21st June 2021

The Manager
Broadcast Spectrum Planning Section
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Re: FM broadcasting services band in Perth RA1 licence area - Options Paper

The following is a submission from the Sports Entertainment Network Pty Ltd (SEN) in relation to the options paper released by the Australian Communications and Media Authority (the ACMA) concerning FM broadcasting services band in the Perth RA1 licence area.

SEN operates commercial, open narrowcast and narrowband services across many areas (including both metropolitan and regional areas) of Australia and New Zealand – the latter as Sports Entertainment Network NZ Ltd.

We understand that the comments made in relation to this matter at this point in time will contribute to informing the ACMA on further actions for replanning the FM broadcasting services band in the Perth RA1 licence area and that subject to the outcomes of this consultation, the ACMA will consult again on the possible technical proposal for the Perth replanning as a basis for subsequent Licence Area Planning (LAP) variation.

General

Whilst each of the "options" presented in the paper are discussed in some detail it is of immediate and serious concern that the press release specifically states that "the only AM stations left (if FM conversion were to proceed) would be SEN and TAB Radio". We worry that a public statement like this indicates this as a 'fait accompli' which would leave both SEN and TAB Radio at a significant disadvantage to the rest of the Perth radio broadcast market.

Regardless of initial views formed from this round of consultation and as a key stakeholder impacted by any changes, we would welcome the opportunity to discuss the ACMA's views prior to the next stages of any process including the release of any further options papers.

The Options Paper

Returning to the Options Paper. We are supportive of the approach to convert AM to FM in markets – not only in Perth but also across the broader Australian radio marketplace.

AM services are, as has been reported in numerous reports and occasions in the past (including in the *The future delivery of radio: Final report*¹), a technology that is much less attractive as both an owner and user-friendly medium. By "friendly" I mean there is a much greater emphasis by users to access the medium via streaming or DAB+ for convenience, quality and ease of listening. In addition, from a licensee perspective, the costs associated with operating AM services are much more expensive with AM equipment becoming less accessible, AM technical resources limited, less

¹ Australian Communications and Media Authority, [The future delivery of radio \[webpage\]](#), ACMA website, March 2020, accessed 20 April 2021.

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supported in motor vehicles and less accessible in in-home devices because of the more heavily promoted DAB+/FM devices.

As a cumulative impact the opportunity to move to an FM environment from AM – as the Perth scenario now presents, must be fully explored and taken advantage of for all parties particularly given the acknowledgement of the Perth geography, the adverse environmental conditions for AM propagation and impulse noise from electric rail and powerlines as noted in the Options Paper.

This situation and opportunity in Perth present, for comment, an opportunity for one metropolitan market at least to provide an equal platform for all broadcasters if planning is undertaken with a broader perspective in mind – not one that is purely focussed on the named commercial operators and the ABC/SBS.

As a consequence, we cannot support any of the options in their current form. Rather we would offer an alternative and additional option.

To be clear, the options presented in the ACMA paper are:

- **Option 1:** Convert to FM both commercial services (6IX and 6PR) and the national ABC AM services (6PB, 6WF and 6RN).
- **Option 2:** Convert to FM the 3 national ABC AM services (6PB, 6WF and 6RN) only. Under this option, the commercial AM services would not convert to FM.
- **Option 3:** Convert to FM both commercial AM services (6IX and 6PR) and plan (and subsequently allocate licences for) 3 new high-power FM services in the Perth licence area for commercial radio broadcasting, national radio broadcasting and/or open narrowcasting services. Under this option, the ABC AM services would not convert to FM.
- **Option 4:** Convert to FM one of the 3 national ABC AM services (6PB, 6WF or 6RN). Under this option, the other 2 national ABC AM services and the commercial AM services (6IX and 6PR) would not convert to FM. This option would minimise changes to the existing services.
- **Option 5:** Plan (and subsequently allocate licences for) 3 new high power FM services in the Perth LAP for commercial radio broadcasting, national radio broadcasting, community broadcasting and/or open narrowcasting services. Under this option, the ABC and commercial AM services would not convert to FM.

The SEN preferred option:

The option we present to the ACMA is an extension of the current option 1 (above) and includes both SEN and Radio TAB.

Preliminary engineering investigations suggest that the available FM spectrum, as identified by the ACMA, can be much more efficiently deployed so as to ensure all broadcasters (including SEN and Radio Tab) can be accommodated in a conversion exercise.

SEN are of the view this is a much more efficient use of the spectrum and one that provides an equitable and fair outcome for all broadcasters in the Perth RA1 market.

If a conversion to a “more palatable” solution for the majority of the market is proposed and free to only a nominated number of licensees (at the exclusion of two) the outcome is not fair and equitable.

As stated, preliminary engineering suggests there is capacity to accommodate the option proposed.

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Summary

It is our strong view that a fair and equitable solution for FM in Perth RA1 can be achieved for all current licensees by effectively and efficiently utilising the advantages or opportunities presented through the utilisation of spectrum made available or presented by the clearance of VHF Band II analog TV on channels 3 and 5 in Bunbury.

It is essential that both SEN and Radio TAB be included in ACMA considerations moving forward.

We welcome the opportunity to answer any questions or provide any further information in support of our submission.

Yours Sincerely

SPORTS ENTERTAINMENT NETWORK PTY LTD



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