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Infrastructure and Equipment Safeguards Section
Australian Communications and Media Authority (ACMA)
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Via e-mail: techreg@acma.gov.au

23 August 2021

SBS submission to the ACMA – Incorporating a new Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) standard into regulatory arrangements – Consultation 28/2021

SBS is a significant user of Broadcast Services Bands (**BSB**) spectrum for delivery of its suite of broadcast services and programs to audiences across Australia. SBS appreciates the opportunity to respond to the ACMA's consultation on incorporating a new ARPANSA standard into relevant regulatory arrangements.

I refer to the new standard published by ARPANSA in February 2021, defined in the ACMA's *Draft Radiocommunications Equipment (General) Amendment Rules 2021* (the **General Equipment Rules**) as the '*Radiation Protection Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz (2021)*' (the **new ARPANSA Standard**).

These changes encompass the BSB spectrum frequencies described as the MF Band¹, which SBS currently utilises via six transmission sites²—operation of these facilities would remain compliant under the new ARPANSA Standard.

In relation to legislative instruments, SBS generally supports the ACMA's proposal to amend relevant legislative instruments to:

- incorporate references to the new ARPANSA Standard into the General Equipment Rules, and licensing instruments;
- update or add references to international standards where applicable; and
- streamline the existing set of regulatory instruments by consolidating the existing Electromagnetic Radiation Human Exposure (**EME**) standard and labelling notice into the General Equipment Rules.

SBS acknowledges the ACMA's ongoing commitment to consultation with SBS and the industry on its work program and looks forward to future opportunities for input and collaboration on relevant topics. Should you have any queries, or would like any further information relevant to this consultation, please do not hesitate to contact Michael Coonan – SBS Head of Regulatory and Government Affairs, at Michael.Coonan@sbs.com.au.

Yours sincerely,

Clare O'Neil
Director, Corporate Affairs

¹ MF – Medium Frequency, otherwise known as Medium Wave. In Australia, spectrum in the range 526.5 kHz to 1,605.5 kHz, which carries Amplitude Modulation (AM) services.

² Sydney, Melbourne, Canberra, Newcastle and Wollongong(2)

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