



SPECTRUM PRICING REVIEW (Part 2)

Date: 29 October 2021

ANRA welcomes the opportunity to comment on the implementation of the Spectrum Pricing Review (Part 2).

Our comments reflect a consensus of our membership. However individual members may make their own submissions.

ANRA, the Australian Narrowcast Radio Association, is the peak industry body representing Low Power Open Narrowcast (LPON) Radio services and High Power Open Narrowcast (HPON) Radio services located across all States and Territories of Australia. Our membership includes the major Narrowcast radio program providers such as the TAB agencies and organisations, foreign language groups, fringe music services, tourist services and religious services, as well as many other independently owned and operated services.

ANRA supports the ACMA proposal to reduce tax rates for transmitter licences used to provide high-power open narrowcasting (HPON) services to bring them closer in line with commercial broadcasting taxes and charge different tax rates for television, FM and AM HPON licences. This will help reflect the difference in bandwidth used by each.

ANRA has no comments in regard to Questions 1-6.

In answer to Question 7:

Do you have any comments on the tax reform proposals for HPON licences?

ANRA supports the Proposal for reduced tax rates for HPON licences.

From the outset when Spectrum Pricing Review was raised, ANRA has maintained the view that HPON fees and taxes were in need of a review. ANRA believed the simplest way to achieve this was to use a similar tax rate as that charged to commercial radio.

Using the same formula...

- Population (of the specific location) x Bandwidth (MHz) x \$0.077/MHz/pop x 0.1 Scaling factor.
- Change the minimum tax to \$41.37 in line with other apparatus licence taxes.

Delivering an outcome showcased on Table 1: Proposed HPON Taxes

Item	Location of open narrowcasting service (significant urban area) ^[1]	FM/TV ^[2]	AM
1	Melbourne	\$7,653	\$689
2	Sydney	\$7,649	\$688
3	Brisbane	\$3,813	\$343
4	Perth	\$3,209	\$289
5	Adelaide	\$2,091	\$188
6	Gold Coast – Tweed Heads	\$1,093	\$98
7	Newcastle – Maitland	\$767	\$69
8	Canberra – Queanbeyan	\$716	\$64
9	Sunshine Coast	\$536	\$48
10	Central Coast	\$519	\$47
11	Wollongong	\$476	\$43
12	Geelong	\$435	\$41
13	Hobart	\$337	\$41
14	Townsville	\$282	\$41
15	Cairns	\$239	\$41
16	A place in Australia not otherwise specified in this table	\$41	\$41

ANRA also supports the removal of CPI and the use of ABS dataset 'Population estimates by significant urban areas' to update the tax rates each year where the HPON LAP covers the whole of the licensed city/town.

It should be noted that there are some HPON services that **only cover a portion (half or third) of the city or town** and, therefore, this should be taken into account when determining the population.

In answer to Question 8:

Do you have any comments on these proposed adjustments to the tranche one reforms?

ANRA suggest that where a HPON has an output power of 10 Watts or less... that no matter where the HPON is located...the minimum fee should apply as the service would be limited in its coverage area.

Fixed/Point to Point 900MHz STL Licences

ANRA would like to raise the issue of Fixed/Point to Point 900MHz STL (studio to transmitter link) Licences. The current fees and taxes pricing, particularly in regard to Narrowcast licences, is disproportionate to the pricing of the actual licence under which the service operates.

By way of example: LPON licence fee \$45 pa...Fixed/Point to Point fee \$638 pa.

ANRA would request that the fees and taxes for 900MHz STL Licences be included as part of the ACMA Spectrum Pricing Review.

CONCLUSION

ANRA acknowledges that the Spectrum Pricing Review has come at an important time for our Sector and welcomes these reforms taking into account our comments above.

Phil Edwards
ANRA President

Ange (Angelo) Nacson
ANRA Executive Officer

06 December 2021