

Submission to ACMA for LAP Variation Mt Gambier 2022

Background

8SAT is the Remote Commercial Central Zone Licensee with extensive coverage in South East South Australia and is directly adjacent to the north of the Mt Gambier Commercial radio license.

8SAT has two adjacent FM transmitters at Padthaway/ Bordertown on 100.3 MHz, broadcasting at 2 kilowatts towards the Mt Gambier license (5Kw toward Bordertown) and 107.3 MHz at Kingston / Robe broadcasting at 2 kilowatts toward the Mt Gambier license. The licenses overlap at the town of Lucindale which is not an urban centre.

Consultation

ACMA made an administrative error and did not publish the original consultation. A new consultation of four weeks was announced. This is significantly shorter than the 3 month consultation ACMA announced for the 2021 8SAT LAP variation of 3 months which is inequitable. 8SAT sought clarification from ACMA about engineering detail including supporting field strength mapping in order to provide this submission. Significantly, ACMA declined to provide the evidence for the LAP variation despite the short time frame to form a submission and the clearly contentious issue of a significant and favourable relocation of site that would prejudice the 8SAT license with overspill. ACMA should operate with uniform rules in technical planning guidelines and provide evidence for decisions that would have an erosive effect on the solace nature of the 8SAT licensed population.

Summary

8SAT strongly opposes the license variation in its current presentation due to a significant relocation of transmitter site closer to the 8SAT's boundary and a significant increased topographical advantage from the new engineering (based on the existing 96.1 MHz Mt Gambier commercial service), the new specification which elicits significant overspill into the 8SAT Urban Centre of Robe. 8SAT is not opposed to the AM to FM conversion but this should occur at the current 5SEF 96.1 MHz 'The Bluff' location and at the current specification.

Current Mt Gambier FM Specification

8SAT has never opposed the current Mt Gambier specification at the Bluff on 96.1 MHz. This specification appears to provide the wide coverage needed and high field strengths into Mt Gambier and Millicent without any significant overspill. The site is 198 metres above sea level and the tower height is 50 metres, or a combined height of 248 metres above sea level at electrical centre. The Mt Gambier licensee currently has 96.1 MHz at 'The Bluff' near Glencoe and 18 kilometres north west of Mt Gambier to which its 20 kilowatts serves very well at high urban grade + 66 dBu. 'The Bluff' is 93 Kilometres to Robe which is an urban centre (more than 1000 people) in the 8SAT LAP. The current specification for 96.1 MHz does not breach Robe due to distance, height of antenna above sea level and terrain between the sites. Casterton is an urban centre in the Hamilton license. It is 75 km away from the current specification.

New Mt Gambier FM Specification

The Mt Gambier LAP variation includes a new broadcast site 16 kilometres north of the current 96.1 MHz FM site at 'Mt Burr'. The new site is much closer to Robe in the 8SAT plan registering 76 kilometres but only 51 kilometres to the license boundary. It is 17 kilometres closer to the Flow

license than the old site. The new site is 34 kilometres from Mt Gambier which is further away. Of even more concern is that 'Mt Burr' is 48 metres higher than 'The Bluff' at 246 metres with an antenna height at 110 metres. This combines to 356 metres. Casterton is 82 kilometres away and is protected down to 5 KW or 6 dBu .

Discussion

The new Mt Burr site is not an appropriate site at the 20 kilowatt field strength toward the 8SAT license as the site provides the equivalent of 10dBu above the old site at the Bluff when proximity of site, height of site and height of antenna are taken into account. The following are other issues with the specification and LAP variation;

1. The Mt Burr site is much closer to the 8SAT boundary at 51 km and is received at high field strengths above 54 dBu inside the 8SAT license including at least 1500 people as projected by ACMA (without evidence being provided) but our projections at 10 metres indicated nearly all of Robe, Nora Creina Beach, Nora Creina, Mt Benson, Reedy Creek, Avenue, Lucindale North, Stewart Range, North Naracoorte and Kybybolite all receiving a service at above 54dBu while significant road coverage at above 48 dBu is obtained at Kingston SE (8SAT Flow urban centre) and Frances. We estimate the total numbers to be more than 2500 at above 54 dBu and fortuitous reception road coverage to many thousands in the 8SAT LAP. This is unacceptable and should have been avoidable overspill had the application included 10 dBu restriction in field strength toward the North West to the North East plane.
2. 5SE and 96.1 SAFM have translators at Naracoorte under the current specification and does not need overspilling field strengths to serve other populations who have been adequately served by 96.1 Mhz.
3. ACMA has sought to protect Casterton in the Ace Radio owned Hamilton plan by a directional pattern of 5 kilowatts however, strangely the 8SAT urban centre of Robe was not protected in deliberations forcing an 8SAT defence at consultation. Why protect Casterton where terrain already does so but leave the line of site Robe open to 20 kilowatts ? Surely the protection should have been toward 8SAT and the minimum required at 5 kilowatts for areas to the north of Mt Burr to reduce overspill into 8SAT at the above locations. We seek ACMA to restrict the pattern to 2.5 kilowatts from 280 degrees to 320 degrees and 5 kilowatts from 320 degrees to 30 degrees. If a change of site is agreed in any case, ACMA should require a start up procedure for the licensee that they provide three collection points for a field strength measurement in Robe at 10 metres receive antenna.
4. ACMA asserting that the overspill of between 584 to 1430 people is well below mapping at 10 metres. ACMA has not provided any evidence to this effect and our analysis shows more than double this number. ACMA seeing this as permissible due to minimal numbers across the whole license is deeply concerning. 8SAT is a remote license that is experiencing the ravages of population decline both through farming demographic changes to which the South East of SA is one positive for 8SAT in population. Taking this population by 'unavoidable overspill' is nonsense. Additionally, ACMA planning has seen a number of 8SAT towns overlapped or lose solace status due to generous overspill obtained by corporate licensees in urban centre places like Kingscote, Ardrossan, Maitland, Kapunda, Roxby Downs and now under this planning, Robe. This is erosion by stealth and must be countered. Robe is a key town in the 8SAT license both from an agricultural, social, sport, news and business advertising point of view. It is frequented by 20,000 people in summer, which is more likely the reason that the increased field strengths to in house coverage have been sought by the licensee. This clearly is an example of broadcasters seeking to broadcast outside their license

area and ACMA should block this accordingly if it was to show any consistency with former 8SAT planning. Commensurate overlap into the 5SE Mt Gambier market has been blocked previously by ACMA at Naracoorte North so why is the Mt Gambier planning so obviously set to hurt this important part of the 8SAT license ?

5. The new site provides a poorer service toward Mt Gambier and the Western Victorian in license component for 5SE and includes better outcomes for the adjacent Hamilton but significantly better field strengths into the 8SAT license or a worse outcome for the adjacent 8SAT license in that case.
6. Strangely, broadcasters seek the best specification for a new FM service and when ACMA planned 96.1 Mhz 20 years ago it would seem this was acceptable. Why is ACMA consulting on planning in the same LAP that gives 20 kilowatts or the same power, when the licensee is moving the site 17 kilometres closer to 8SAT and increasing height by more than 108 metres? Surely ACMA engineering flagged this incongruence? We will continue to seek all documents relating to this planning.

Conclusion

We seek ACMA to not proceed with the new Mt Burr site at the LAP consultation specification and have the licensee return to planning at The Bluff site.

Wayne Phillips, Managing Director

8SAT Flow Media

21 April 2022