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ACMA Mudgee Draft LAP – 2MG Proposed AM to FM Conversion

We refer to the ACMA March 2022 consultation paper and thank the ACMA for the opportunity to comment. The ACMA proposal would result in extensive and unwarranted new 2MG FM overspill from both the proposed 2MG FM sites into the Rebel Media [RM] 4BRZ/4RBL regional commercial FM radio licence area jointly reaching up to ~5,132 people.

Recent FM conversions in NSW for 2GN Goulburn, 2BS Bathurst, 2ST Nowra & 2XL Cooma resulted in smaller FM coverage areas (and less overspill) than their s39 sister FM stations, even though both commercial stations in each solus market share a common licence area and ownership. In the Mudgee market 2MG (Mudgee RA1) has a separate, smaller licence area than its s39 sister FM station 2GEE (Mudgee RA3), so it's surprising and inappropriate the ACMA is proposing 2MG have an identical FM coverage area that matches the larger 2GEE market.

The 2MG market is smaller, and its FM coverage should be tailored accordingly by the ACMA from scratch to contain coverage largely within the smaller Mudgee RA1 licence area boundaries and minimise any unnecessary FM overspill beyond it, including into areas served by 2GEE that fall outside the 2MG licence area.

The extent of the existing 2MG 1449 kHz AM coverage should not be considered an acceptable overspill benchmark for a newly planned commercial FM transmission to reach, given the opportunity exists to appropriately tailor the new 2MG FM transmission coverage to the licence area, and minimise avoidable overspill of what will effectively be a brand new additional FM competitor receivable in the adjacent RM market.

The 2MG Magpie Hill 97.1 MHz 10kW Proposal

Modelling demonstrates the 10 kW OD proposal to be quite excessive to serve the Mudgee RA1 market (and Mudgee RA3 market). RM was not consulted on the original 2GEE Magpie Hill specification. As the Mt Bocoble infill repeater site was not originally in the 2GEE licence area, a more appropriate complimentary specification for 2GEE Magpie Hill would likely have been licensed had both been sites planned simultaneously.

Excluding the Kandos area served separately by an infill repeater - a Magpie Hill service only needs to serve an average ~35 km radius to reach the Mudgee RA1 licence area boundaries, and under a 20 km radius to reach all ABS population centres >200 people.

Modelling indicates adequate coverage of the Mudgee RA1 market is broadly easily achieved at an ERP of ~2 kW OD, with notable overspill already created at that level. Raising ERP beyond 2kW OD creates excessive overspill beyond the Mudgee RA1 licence area boundaries and disproportionality increases the number people avoidably served outside the market, beyond the number of additional people reached within the market.

At 10 kW OD it's gold plating coverage within the market with scant regard to overspill, and near suburban grade coverage occurs along large tracts of its licence area boundary, well distant from any population centres within the licence area. The ACMA's own projections shows approximately a quarter of the population reached (up to 3,832 people) would lie outside the licence area within the RM market, a figure that represents notably more people than live in the 2nd largest urban centre (Gulgong) of the Mudgee RA1 market!

We ask the ACMA to reject this proposal and plan a more appropriate Magpie Hill specification that has been tailored to the 2MG Mudgee RA1 market. We suggest 2 kW OD as a starting point, with a suitable directional radiation pattern employed for any proposal advanced above 2 kW ERP.

The 2MG Mt Bocoble 101.5 MHz Proposal

The ACMA is proposing 2MG site at Mt Bocoble;

- located ~5 km outside the 2MG Mudgee RA1 licence area
- co sited with a further three commercial FM services; RM (4BRZ, 4RBL) and 2GEE.
- using the same wider radiation pattern as 2GEE - making no attempt to restrict and target coverage to the smaller 2MG licence area.
- whose coverage largely fortuitously will exceed & serve more people within the RM market than the ACMA has afforded to the co-sited 4BRZ/4RBL services that are actually licenced to serve the area.

It's primarily intended to serve the urban centre of Kandos (pop 1,263 - ABS 2016 census), but to achieve that, the signal has to first overspill traverse a straight line across 16 km of the RM market before it even reaches the start of the 2MG licence area boundary.

The ACMA's own modelling predicts this 2MG FM service would overspill up to ~1,300 people in the RM market – which is more people than live in the sole urban centre (Kandos) the 2MG repeater is designed to serve!

The following map shows the 2MG (Mudgee RA1) commercial licence area and the Mt Bocoble signal path to Kandos;



For comparison, the same map below of the region shows the RM regional commercial FM radio licence area, demonstrating the RM market extends notably further east, south & west from Mt Bocoble than the 2MG licence area.



The RM licence area also extends further across those three sectors than the 2GEE licence area. Naturally, this warrants the RM Mt Bocoble commercial FM services be planned by the ACMA for greater power and further signal reach across all three sectors, than that afforded to either the co-sited 2GEE service or the 2MG service that both have geographically smaller markets than RM in this region.

Surprisingly to date, the ACMA has done the polar opposite, by heavily imposing power restrictions on the RM Mt Bocoble services, compromising adequate coverage reach in the RM market, in order to prioritise protecting the Mudgee market from increased overspill and upholding the objections of 2MG/2GEE.

The ACMA granted higher power to 2GEE (and a licence area extension) despite RM objections, and is now proposing to (largely fortuitously) gift the same FM coverage advantage to 2MG, based at a transmission site outside the 2MG licence area, with apparently zero consideration for minimising the additional commercial FM overspill into the RM market, that exceeds the entire RM coverage from the site.

To compound the planning imbalance, the ACMA has limited the signal protection level of both the RM Mt Bocoble services to 60 dB uV/m, while affording a greater protection level to the 2GEE service @ 54 dBuV/m, thereby extending a further protected coverage advantage to 2GEE over RM within our market. The ACMA defended this decision at the time, advising there were no remaining FM channels with 54 dB uV/m protection available for RM use at the site.

Frustratingly, the ACMA is now proposing a new 54 dB uV/m protected channel for 2MG at the site, that it apparently couldn't find earlier for RM services, thereby offering both 2MG & 2GEE greater protection than both the RM services.

This is an inappropriate & discriminatory proposal relegating the RM co-sited services with the largest licensed market, inferior coverage, with lower protection levels and lower power across every sector than being proposed for 2MG.

We ask the ACMA to reject this proposal and start seriously protecting all commercial radio licence areas with consistent equality, irrespective of the markets population density or ownership of the commercial radio stations.

We acknowledge that 2MG has a right to serve Kandos and we have no objection to that being on FM (other than rare 54 dB uV/m better protected channels should be offered first to the RM stations with the largest licence area to serve), but any 2MG Kandos FM repeater should be sited within the existing Mudgee RA1 licence area. For example, modelling demonstrates a 300 W OD repeater located at ACMA Site 10010391 is sufficient to serve the Kandos, Rylstone, Pinnacle Swamp & Carwell districts with far less overspill.

Regards

A handwritten signature in black ink, appearing to read 'Aaron Jowitt', with a stylized flourish at the end.

Aaron Jowitt
Director