

Nicole Brown

From: Aaron Jowitt <aaron.jowitt@rebelconnect.com.au>
Sent: Wednesday, 7 December 2022 7:54 PM
To: BCP
Cc: Alex Kostic
Subject: RCRS draft LAP variation - Norfolk Island (NI)

Hello,

The discussion paper states;

'Pines FM' has been operating since 2018 using a ... TCBL on FM frequency 99.9 MHz. It is proposed to change the frequency of Pines FM to 90.9 MHz to improve coverage as it will better suit the radios in cars on the island, the majority of which are imported directly from Japan.

We have no data on what percentage of NI cars are top band limited to 95 MHz (or 90 MHz) and whether this is a significant issue in practice. But given the ACMA's conclusion that it is beneficial for NI FM services to be within the Japanese FM band (<95 MHz), we note the ACMA is proposing one of the new commercials (4RBL) and one of the new national services be allocated above 95 MHz outside the Japanese band.

With 9 proposed FM services at Mt Pitt, has the ACMA considered accomodating all (or as many as possible) on 0.8 MHz spacing below 95 MHz?

i.e.

#1 88.5
#2 89.3
#3 90.1
#4 90.9
#5 91.7
#6 92.5,
#7 93.3
#8 94.1
#9 94.9

If that is not possible, in keeping with the existing 1 MHz raster, could 4RBL alternatively

1. be allocated 88.9 MHz?
2. or frequency swap with the proposed new ABC 92.9 MHz service? This would provide an even balance of two commercials, two communities and two nationals < 95 MHz.

Regards

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