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**Submission re**

**Proposed Changes to**

**Apparatus Licence**

**Pricing Structures**

ANRA welcomes the opportunity to respond to the ACMA request for consultation on Proposed Changes to Apparatus Licence Pricing Structures. Our comments reflect the 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 the 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.

As always ANRA appreciates the opportunity to make this submission and is aware that ACMA has a good understanding of the ongoing development of the Narrowcast sector when making decisions that may impact its future growth.

Regards,

Phil Edwards (President) XXXXXXXXXXXXXXXXXX

Ange Nacson (Executive Officer) XXXXXXXXXXXXXXXXXXXX

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The Australian Narrowcast Radio Association (ANRA) would like to submit the following comments in regard to the questions raised in this review...

### Question 1

*Do you have any comments on the proposed usage of the ABS dataset ‘Estimated resident population, Significant Urban Areas’ as* *the basis for the framework to update apparatus licence taxes annually using changes in geography-specific population?*

**Answer 1**

From the above information supplied the SUA’s appear to be a reasonable basis for the framework to update apparatus licence taxes annually.

### Question 2

*Do you have any comments on the indicative timing of annual updates to apparatus licence taxes using changes in geography-specific population?*

**Answer 2**

ANRA would suggest that 01 July annually would be an appropriate date.

### Question 3

*Do you have any comments on the proposal to update the annual licence tax amount for television outside broadcast network licences and the proposed amendment to the Determination?*

**Answer 3**

ANRA has no comment on this question.

### Question 4

*Do you have any suggestions on how the ACMA could introduce additional measures to further the pricing of licences for varying levels of interference or examples of mechanisms that you think the ACMA should consider for implementation?*

**Answer 4**

In relation to HPONs, in many cases, the power and the LAP or actual coverage is a percentage of that for the whole city or town. That percentage should also be incorporated into the final equation.

In relation to LPONS, licences are restricted to the Drop-Though (87.5-88.0MHz) zone of the spectrum and there are only three frequencies allocated. Therefore we query the classification of High, Medium or Low as the density of available licences remains the same wherever an allocation has been approved.

### Question 5

*Do you have any suggestions on which licence types and sub-types should be considered by the ACMA for implementation of mechanisms that* *price for varying levels of interference?*

**Answer 5**

As LPONs are only 1-10 Watts, we believe they should be priced accordingly as they emit low levels of interference.

### Question 6

*Do you have any comments on the potential extension of the low-power and micro-power discounts to additional services?*

**Answer 6**

ANRA supports the extension of the low-power and micro-power discounts.

ANRA also supports the same discounts being afforded to LPON Apparatus Licences, as they share similar type power restrictions. For example, LPON designated operation power being 1.64 watts EIRP, which is less than the 8.3 watts EIRP for enclosed and short-range land mobile services.

Low-power spectrum accesses pay one-tenth of the annual tax and micro-power spectrum accesses pay one-twentieth of the annual tax that would otherwise apply, both subject to a minimum tax.

### Question 7

*Do you have any suggestions on how and where the ACMA could introduce interference protection pricing mechanisms to the apparatus licencing framework?*

**Answer 7**

ANRA has no suggestions.

### Question 8

*Do you have any suggestions for additional pricing measures the ACMA could consider to encourage spectrally efficient technology deployments?*

**Answer 8**

ANRA has no suggestions.

### Question 9

*Are there any other comments that you would like to give relating to the proposals in this paper or other aspects of the apparatus licence tax regime?*

**Answer 9**

ANRA has submitted its comments and suggestions based on the information contained in this document being accurate and comprehensive.