

[REDACTED]

From: [REDACTED]
Sent: Thursday, 15 December 2022 12:42 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: CM: ACMA Draft LAP variation - Tamworth vs Great Lakes

Hello [REDACTED],

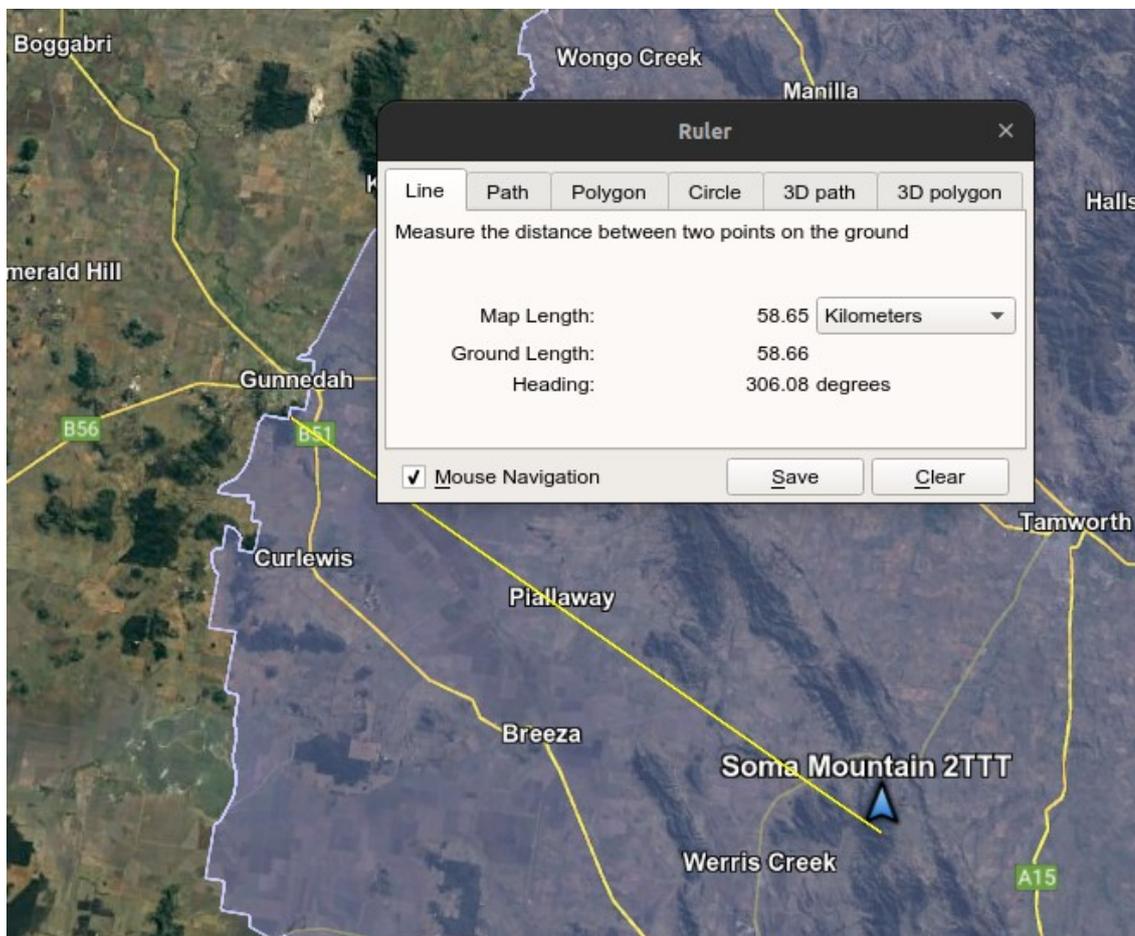
I refer to the ACMA Tamworth radio draft LAP variation released yesterday. We are concerned it is the latest example of the ACMA continuing to take a different planning priority approach in select parts of our market when balancing adequate coverage of the licence area vs minimising unavoidable overspill. Let's quickly compare two markets that to date this year, face quite a different outcome from ACMA planning.

ACMA Tamworth planning approach: Market adequate coverage is the highest priority

The ACMA is proposing to increase the current LAP ERP of Super Radio Network's (SRN) 2TTT at Soma mountain towards South Gunnedah (@ 306 deg) from 10 kW to 20 kW, and convert SRN's 2TM to FM using the same 20 kW radiation pattern.

The ACMA overspill analysis explains it as; *"The township of Gunnedah with a population of 7,984 people is on the boundary of the Tamworth RA1 licence area and most of the predicted overspill would occur in this one location. ... We consider the amount of predicted overspill that will result from converting the 2TM commercial broadcasting service to be a necessary consequence of serving the Tamworth RA1 licence area."*

From Soma Mountain, there are no urban centres within the Tamworth RA1 market that lie within a 100° degree wide sector from 252°-352°, which Gunnedah lies near the middle of.



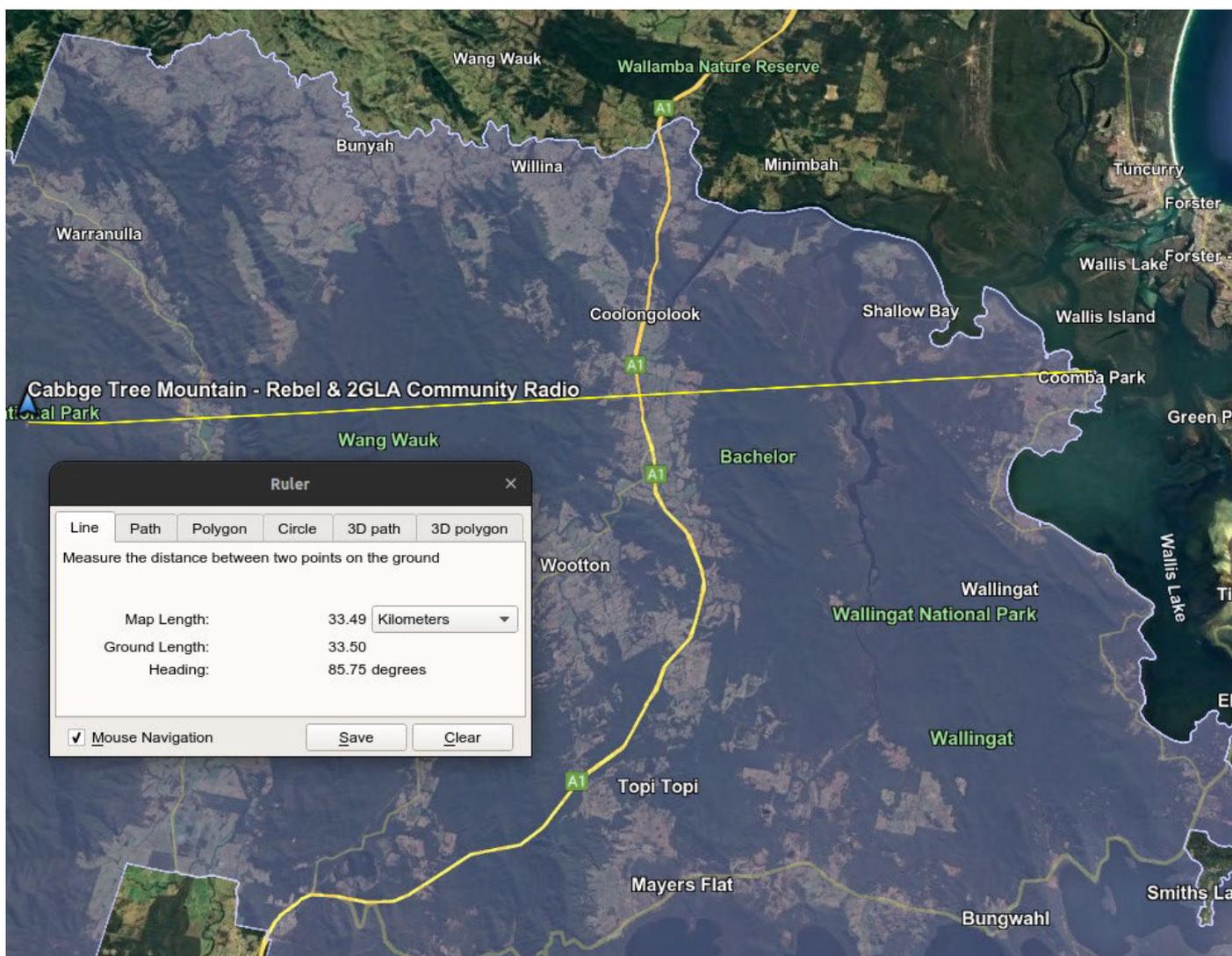
The purpose of the proposed 20 kW arc towards Gunnedah is therefore to adequately serve a rural population base located outside any of the Tamworth market's urban centres. The market's sole locality within that sector is Curlewis, (ABS population 605).

Gunnedah has an ABS 2021 population of 8,338 and will receive near blanket overspill coverage from 2TTT 92.9 & 2TM 95.5. Gunnedah is, by far, the largest urban centre within the neighbouring market of Gunnedah RA1. It will also overspill to Boggabri on a similar bearing of 315° (ABS population 805), which lies some 32 km outside the Tamworth RA1 market.

There are multiple practical options to avoid Gunnedah & Boggabri overspill. So how did the ACMA come to determine the overspill to be 'necessary'? For example, preliminary modelling suggests rather than increasing ERP to 20 kW towards South Gunnedah, that suitably restricting Soma Mountain ERP towards Gunnedah (to 1-2kW for example, using a practical 10-13 dB front to back ratio antenna) would eliminate most overspill to Gunnedah & Boggabri while still serving Curlewis (though this could be further boosted with a small town based repeater if needed). None of this needs to impact adequate coverage within any of the market's urban centres, so why is the ACMA even advancing its current proposal?

ACMA Great Lakes planning approach: Market adequate coverage is a low priority.

~169 km distant from Tamworth in our adjacent licence area, Cabbage Tree Mountain is the Great Lakes transmission site for 4BRZ, 4RBL and community station 2GLA. A narrow eastern 60-152° sector from the site is the primary populated sector containing our target locality of Coomba Park (@ 85° bearing) population 587, and the urban centre of Smiths Lake (@ 110° Bearing) population 1,332.



It's dead easy for Rebel to commence adequately serving Coomba Park, Smiths Lake and along our eastern boundary adequately from Cabbage Tree Mountain if granted the requested ERP of 5-10 kW. The co-sited 2GLA Cabbage Tree service is already achieving that, having been licenced by the ACMA to operate at 10 kW, allowing them to adequately service to their markets eastern sector boundary point which it shares in common with 4BRZ/4RBL.

To date, the ACMA have not extended similar high power specifications to the co-sited Rebel services, and have restricted us to a manifestly inadequate 0.25 kW low power eastern sector ERP that fails to deliver TPG target signal grades to the region, and is markedly inferior and uncompetitive with the extensive fortuitous overspill FM coverage (east of the Pacific Highway) the ACMA granted in 2020 to SRN's new adjacent market 2RE Taree 10 kW 88.9/100.3 commercial service. The ACMA justification to refuse Rebels requests to also operate at higher power (as afforded to 2GLA, 2MVB & 2RE) has been to protect SRN's Taree RA1 services at Forster from increased overspill - though the ACMA made no matching effort recently to equally reciprocally protect our market from new SRN 2RE overspill.

Forster (@ 81° bearing from Cabbage Tree) sits right along our licence area boundary separated from our target population centre of Coomba Park only by the waters of Wallis Lake. Trying to stop Cabbage Tree signals travelling an additional 4km beyond Coomba Park over a flat water path along the same bearing is futile and technically impossible, and has to be a near perfect textbook definition of what constitutes 'unavoidable overspill' that occurs as a result of providing an adequate service to our market. Not surprisingly, commercial competitors 2RE/Max FM currently overspill back to Coomba Park (at suburban grade quality) while serving adjacent Forster. The ACMA believes 'unavoidable overspill is quite acceptable' in one direction only (favoring the bigger market) and is reciprocally unacceptable between the same two adjacent towns - which makes no sense.

Rebel Great Lakes overspill into Forster is 'wholly necessary' if Cabbage Tree Mountain is to operate at sufficient ERP to adequately simultaneously serve Coomba Park, Stroud and our urban centre of Smiths Lake. That is not in dispute, yet frustratingly the ACMA push through 'gold plated FM rural coverage' based variations like Tamworth

that produce unnecessary levels of overspill into a urban centre adjacent to its licence area, while the ACMA continue to leave our neighbouring Great Lakes markets core population centres inadequately serviced.

The merits of the Rebel Great Lakes high power proposals are far superior to the Tamworth proposal, if only because the Rebel overspill is 'genuinely unavoidable overspill' and because it results in adequate service to two population centres (including an urban centre) of our market that otherwise can't be adequately and competitively served efficiently from a single transmission site. Tamworth can't claim that. So how is it that Tamworth progresses through the ACMA and Great Lakes does not?

It appears either the ACMA is;

- practicing unwarranted 'one way' discrimination against a less densely populated licence area, where two adjacent markets have adjacent population centres along a licence area boundary of dissimilar population size.
- advancing the Tamworth proposal in the belief SRN & CRA wouldn't complain given the common ownership of Tamworth and Gunnedah markets.
- prioritising risk averse planning, avoiding advancing solutions for a smaller independent broadcaster that may generate SRN/CRA opposition, finding it easier to routinely reject proposals after extended evaluation windows and leaving urban centres in our market unserved.

With due respect, the ACMA approach on Great Lakes planning has failed over many years to deliver services by holding Rebel to unreasonable expectations that we should be the only broadcaster in the region;

- stuck delivering badly inadequate & uncompetitive service levels, or
- getting stuck with commercially unviable & uncompetitive multiple small repeater sites & multiple frequencies - where one high power site could have easily done the job better & more efficiently.
- that somehow manages to pull off the impossible and submit/licence proposals that magically stop a high power FM signal traversing a 4km wide lake into Forster, all while we endure high grade overspill from Forster/Taree commercial FM services back into our core Great Lakes population centres.

Common sense and fairness needs to prevail. We need an avenue to deliver our planned wide coverage, high power, single site, viable, competitive and adequate commercial FM services to our Great Lakes region communities that have every right to expect their licenced services we want to provide, with the ACMA proactively helping facilitating that outcome without fear or favor, and where adequate & competitive coverage becomes the priority outcome driver.

Given FM spectrum at Cabbage Tree Mountain required to resolve our coverage deficiencies is heavily limited, we are also concerned (as foreshadowed in our November 2021 correspondence) that the ACMA has chosen to prioritise allocating 5 new commercial FM frequencies in the adjacent Tamworth market. That may make it even tougher to find Great Lakes solutions, and it gets riskier the longer this goes unresolved.

In late 2021 you estimated the ACMA would be able to consider Great Lakes solutions in the first half 2022, though we acknowledge we have submitted further proposals for consideration in the interim to maximise a chance of getting the best solution in the LAP. We ask the ACMA to urgently detail what it is proposing to finalise our Cabbage Tree Mountain Great Lakes services, and please update us on the likely timeline. We look forward to working with you to finalise workable solutions soon.

Regards

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Aaron Jowitt

Group Engineer

Rebel FM & The Breeze



