



6 October 2023

Australian Communications and Media Authority

Via ACMA Website Submission

ABC submission to the ACMA regarding:

Proposed digital radio channel plan for Launceston

The Australian Broadcasting Corporation (ABC) welcomes the opportunity to respond to the above consultation which was released by the Australian Communications and Media Authority (ACMA) on 1 September 2023.

The ABC considers digital radio as an important platform for the delivery of multiple high audio quality services to its audience and is seeking expansion of its existing network of metro DAB+ services to regional areas, including Launceston.

The ABC is currently hosting a proof-of-concept trial of a low cost, low power DAB+ transmission in Launceston, facilitated by the ACMA's granting of a Scientific Apparatus Licence for operation on frequency block 9C. This frequency block was requested in the ABC's licence application as it is immediately adjacent to the planned Category 1 multiplex frequency block 9D. Provided that the appropriate 9D licence requirements are met, this allows the use of a single transmitter whose output spans the two adjacent frequency blocks, mitigating the need for multiple transmitters, combining equipment etc, an approach consistent with the concept of low-cost implementation of DAB+ services.

On successful completion of the Launceston technical trial, the ABC would ideally wish to continue with this low-cost, low-power configuration which is dependent on the ABC reserving the flexibility to retain flexibility to maximise the allocation of adjacent (or near adjacent) frequency blocks in future markets.

Main transmitter technical specifications

In relation to the proposed digital radio channel plan for Launceston, the ABC believes the Maximum ERP defined in the technical specification for the Mt Barrow

service should be at least 20 kW rather than the proposed 5 kW. A service of 20 kW ERP or greater would provide improved coverage across the licence area and reduce the requirement for additional in-fill services, should this approach to coverage planning be adopted by the ABC.

Given the ABC's proposal to increase the power of this service beyond 5 kW, the ABC supports ACMA's proposal to allocate 8B as the channel for Mt Barrow.

Infill transmitter frequency allocation

The ACMA's proposed digital radio channel plan for Launceston includes the allocation of frequency blocks 8B and 9D for the Category 3 (National) and Category 1 multiplexes respectively. This proposal precludes the desired operation of the described low-cost, low-power dual multiplex DAB+ transmission system, whose configuration is based on the use of adjacent frequency blocks at any infill sites the Category 3 licensee might choose to operate.

If Mt Barrow is to be allocated frequency block 8B, the ABC would ordinarily have proposed that its Launceston infill services be allocated channel 9C to permit low-cost DAB+ operation of the type described above. The ABC understands that the ACMA has reservations about its ability to reserve more than one frequency block in a single licence area for a Category 3 multiplex licensee.

While the ABC would prefer that both blocks 8B and 9C be allocated, in the interests of moving to quickly permit the ABC to move from a content-restricted scientific apparatus licence to a full DAB+ Category 3 multiplex licence issued under this process, the ABC is prepared to accept the allocation of 8B in Launceston for the infill services.

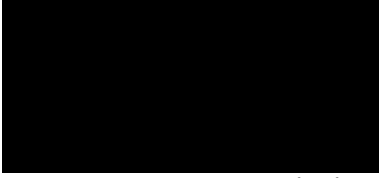
In the event that the ACMA were to reconsider the allocation of 9C to the infill service, the ABC notes that as Category 3 frequency block 9C is already in use in Hobart, a 9C transmission in Launceston would of course create the potential for mutual interference between the Hobart and Launceston services. The extent of this potential interference needs to be analysed and the ABC would expect to manage any interference between its own services.

With respect to the ACMA's reservations about allocating more than one frequency block to the Category 3 multiplex licensee, the ABC notes section 44A of the *Radiocommunications Act 1992* requires the ACMA to prepare a plan that allots a frequency channel or channels of at least 1.536 MHz each (s44A(1)(a)), reserving a frequency channel of at least 1.536 MHz to the category 3 multiplex licensee (s44A(1)(b)). In the ABC's view, the best interpretation of this provision permits the ACMA to allocate one or more channels to the Category 3 multiplex licensee in any licence area.

The ABC also notes that, of the eight available nationwide DAB+ channels, ACMA has only reserved two for use by the Category 3 multiplex licensee. This has the practical effect of requiring the Category 3 multiplex licensee to operate in single frequency network (SFN) mode beyond some licence areas where this is not a

requirement for the equivalent Category 1 multiplex licensee, in apparent contravention of s44(11) of the *Radiocommunications Act 1992*.

Yours sincerely



Manager, **Transmission Contracts and Licensing**