

ACMA Draft Five-year Spectrum Outlook 2024-29 and 2024-25 Work Program

Capital Radio Network Submission 06 May 2024

The Capital Radio Network (“CRN”) is a privately owned and operated commercial radio broadcaster with commercial radio stations operating in the following licence areas:

1. **Canberra;**
 - i. Forever Classic 2CA
 - ii. Talking Canberra 2CC
 - iii. My Canberra DAB+
 - iv. Snow DAB+
 - v. KIX Country Canberra DAB+
2. **Goulburn** (New South Wales);
 - i. Forever Classic GNFM 107.7
 - ii. 93.5 Eagle FM
 - iii. KIX Country Goulburn 100.7
3. **Snowy Mountains** (New South Wales);
 - i. Forever Classic XLFM 96.1
 - ii. 97.7 Snow FM
4. **Warragul** (Victoria); and
 - i. Forever Classic 3GG
5. **Perth** (Western Australia).
 - i. Forever Classic 6iX
 - ii. My Perth DAB+
 - iii. KIX Country Perth DAB+

The CRN is supportive of the Australian Commercial Media Authority’s (“ACMA”) efforts in furtherance of AM to FM conversion for commercial radio broadcasters in competitive markets. It is clear from recent commercial radio surveys in provincial and regional competitive markets, that AM listenership is declining, placing increased importance on conversion works in competitive markets such as Canberra and Warragul.

The CRN enjoys open dialogue with the ACMA with respect to these conversions, however for the purpose of this submission, reiterates that the process to convert AM services to FM in competitive markets is slow and inefficient, resulting in declining audience numbers,

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heightened operational costs and impact to market revenue results. This position has been discussed with the ACMA in numerous conversations.

The CRN's submission with respect of the ACMA's Draft Five-Year Spectrum Outlook Work Program will focus on applications made to the ACMA with respect of AM to FM conversions in the Canberra RA1 Licence Area and the Warragul RA1 Licence Area.

Conversion in the Canberra RA1 Licence Area:

Radio Canberra Pty Ltd ("**Radio Canberra**"), made an application to the ACMA for conversion of its AM services, namely, Forever Classic 2CA (1053 KHz) and Talking Canberra 2CC (1206 KHz) on 16 February 2023.

In April of 2023, the application was updated to include in market competitive licensee agreements with respect of the Canberra RA1 licence area. Radio Canberra received notice from the ACMA in April 2023 that guidance notes with respect of this conversion would be placed in the queue for generation and supply to Radio Canberra. To the date of this submission (06/05/2024), guidance notes are yet to be received from the planning division of the ACMA with respect of conversion in Canberra.

Conversion in the Warragul RA1 Licence Area:

While the Warragul application is further along than the Canberra example, the CRN is still unable to obtain any commitment or understanding from the ACMA with respect of progress on conversion in Warragul.

The initial application was provided to the ACMA on 11 January 2023. This application contained an initial engineering assessment and required in market competitive licensee agreements and relevant LAP variation application forms. Subsequently, guidance notes were received by Radio Gippsland Pty Ltd ("**Radio Gippsland**") on 27 March 2023. After the receipt of guidance notes, a phase two Engineering Report was supplied by Radio Gippsland to the ACMA by CRN on 20 September 2023 for final determination of the application.

Conclusion:

Commercial Radio is essential in the role that it plays to deliver local news, Australian music, emergency broadcast of information, community related information and entertainment to listeners.

Given numerous conversations with key staff within the ACMA, the CRN is mindful of the task at hand in completing AM to FM conversion in competitive markets, however, the above submissions exemplify the lengthy delays in the process to allow AM commercial broadcasters to convert their services to FM. In competitive markets such as Canberra and Warragul, market segregation is a key concern where a mismatch of technology usage (AM

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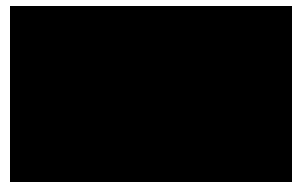
and FM) provides unequitable and unfair advantage, highlighted by reduced audience numbers in these markets, which has financial impacts on the relevant broadcasters.

We thank the ACMA for the opportunity to provide a submission on their Five-Year Spectrum Outlook Work Program, however reiterate that the process to complete these projects is slow and inefficient, impacting commercial AM broadcasters' ability to continue to deliver community focused radio to regional markets.

For and on behalf of the Capital Radio Network




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