



**Response to
ACMA DRAFT
FIVE-YEAR SPECTRUM OUTLOOK
2018-22**

ANRA welcomes the opportunity to respond to the ACMA DRAFT FIVE-YEAR SPECTRUM OUTLOOK 2018–22. Our comments reflect a 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 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. Narrowcast Radio in Australia now accounts for ten times more licenses issued than those from the Commercial and Community sectors and is continually growing.

Regarding Issues for Comment:

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At a glance—2018–19 work program continued - Table 2

Planning—optimising established planning frameworks.

Planning area - Broadcasting analogue and digital radio

*Broadcasting analogue and digital radio - **Decide on extension of the determination of the low power open narrowcasting (LPON) sub-band***

Proposed timelines – Q2 (ie, between 01 Oct and 31 Dec 2018).

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Broadcasting

The narrowcasting industry expressed concerns about certainty of access to spectrum for LPON services. The ACMA acknowledges these concerns and will endeavour to make its decision about extension of the determination of the LPON sub-band during 2018, well before the expiry of the current determination in 2020.

ANRA is pleased that ACMA has acknowledged our concerns and has already commenced working on the decision on the extension of the determination of the low power open narrowcasting (LPON) sub-band. This prompt action will go towards easing concerns raised by the Narrowcasting Industry regarding the provision for sufficient certainty of access to spectrum to facilitate forward business planning, as expressed in previous responses.

ANRA is continually in consultation with the ACMA regarding the LPON decision for the extension within 2018.

Regarding Issues for Comment:**Page 45 - Extract**

Amateur radio - Progress achieved

The ACMA considers that operating amateur services in this frequency range is not feasible as it would be inconsistent with ITU Radio Regulations and existing services already operating in the frequency range. This frequency range is used by a variety of fixed and land mobile services as supported under the VHF mid band (70.0-87.5 MHz). Class-licensed devices authorised under the LIPD Class Licence operate in the frequency range 70-70.24375 MHz.

ANRA supports the notion that additional frequency bands could be made available for amateur use, **however** ANRA also agrees with ACMA that this frequency range is not feasible as an allocation of 87.5FM would cause adjacent channel interference to 87.6FM operators whose bandwidth includes the frequencies between 87.5FM and 87.7FM.

Regarding Issues for Comment:**Page 65 - Extract**

Pricing - Progress achieved

A number of submissions suggested that the ACMA should review spectrum pricing for particular services (such as satellite services in Ka- and Ku- bands, and HPON services). The ACMA anticipates that the general pricing review flowing from recommendation 7 of the Spectrum Pricing Review will address pricing adjustments required across a number of industries and spectrum bands.

ANRA supports a review of the fee structure for HPON services on the basis that ACMA undertake extensive consultation with operators and members. ANRA feels that a good starting point would be to consider the recent changes to commercial fees with a view to a comparative reduction being applied to HPON services.

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Invitation to comment

1. What further improvements could be made to the FYSO to make it easier for stakeholders to engage with the ACMA on its work program?

ANRA is pleased with the current engagement processes with the ACMA on its work program, with the vision that this engagement will lead to a more flexible framework for narrowcasters to develop the industry.

2. Are there other technology developments or sources of spectrum demand the ACMA should be aware of in considering spectrum management over the next five years?

ANRA would like to see more of the current BSB opened up so that narrowcasters can have access for both HPONs and LPONs.

3. Do you have any feedback on the ACMA's plans for monitoring, initial investigation, preliminary replanning or re-farming of bands?

ANRA has no feedback on this topic at this stage.

4. Do you have any feedback on optimising established planning frameworks?

ANRA would like to see greater flexibility of access for narrowcasters to digital radio especially in regional areas.

5. Do you have any comments about the ACMA approach to the forward allocations, or the specific allocation scenarios?

ANRA has no comment on this topic at this stage.

6. Do you have any feedback on the ACMA's approach to Spectrum Review Implementation?

ANRA is pleased with the current approach and would like to see the current level of consultation maintained before any decisions are finalised.

7. Do you have any comments about the ACMA's planned activities for licensing and licensing systems, pricing, compliance and enforcement, and international engagement?

As previously stated in the FYSO comments, ANRA supports the ACMA's recommendation to remove the "Use it or lose it" condition.

Concluding Comments:

ANRA appreciates being part of the process of consultation and encourages a collaborative approach between the different sectors of Radio broadcasting.

Our members thank the Authority for the opportunity to comment in the consultation process and look forward to a continuing and positive dialogue.

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29.06.18

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