



Response to
The Future Delivery of Radio Services in
Australia

ANRA welcomes the opportunity to respond to the ACMA paper The Future Delivery of Radio Services in Australia. 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 has 2,370 Low Power Open Narrowcasting (LPON) licences and 240 High Power Open Narrowcasting (HPON) licences.



Australia has a complex landscape of free-to-air radio networks

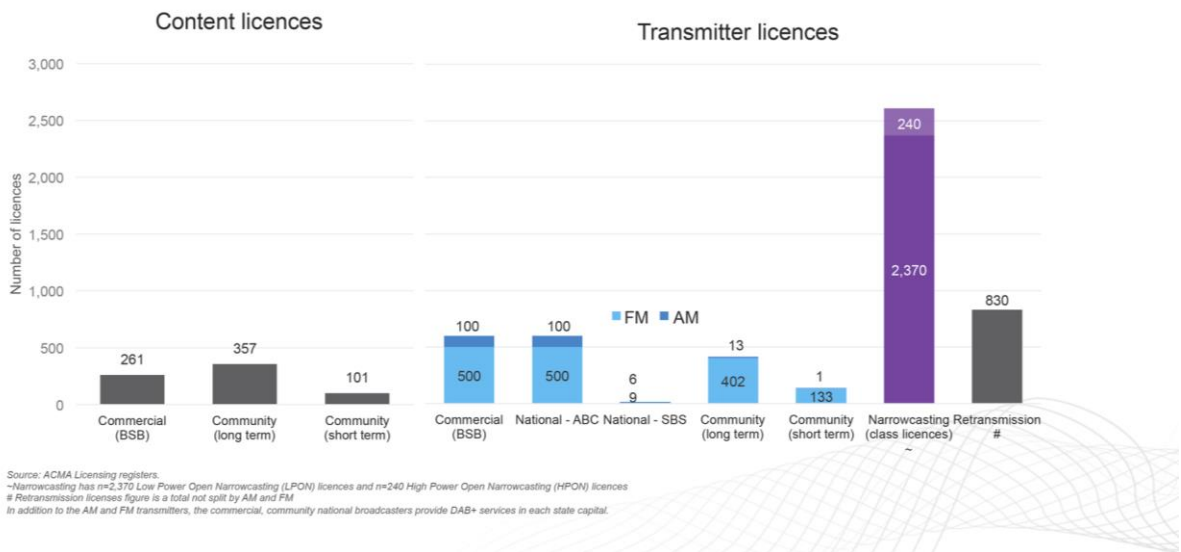


Image from ACMA- Licence Holdings

Following on from the Future Delivery of Radio Services Industry Forum attended by ANRA Executive, and a survey of ANRA Members, we would like to submit the following response to the three scenarios the ACMA presented to stimulate discussion about the future delivery of radio services.

In responding to these discussions, it is important that the Narrowcast Sector should continue to be consulted on any changes that may affect the sector.

In general, ANRA feels that the market will decide which platform/s they prefer in the car, at work, at home, or away. In most cases we believe it will be a combination of platforms. Additionally, for the safety and security of Australia and its citizens, we should not be reliant on one delivery method to communicate important messages and information.

Scenario One—Radio makes greater use of AM/FM Technology

- At this stage ANRA is not confident that there is any other platform that has a footprint commensurate with the current AM regional coverage.
- AM/FM has shown to be vital to reach people during times of natural disasters and emergency situations with most of the population having portable receivers.
- In the Australia situation, ANRA feels that AM has a continuing, long-term role in the delivery of radio services, especially in regional areas.
- With AM firmly established and operating, ANRA does not believe any provider of an alternative radio platform would consider undertaking the considerable investment in infrastructure/etc to service sparsely populated regional areas, particularly given the likelihood of minimal return on investment.
- When looking at the possible migration of all AM services into the FM band, and taking into account the current congestion of carriers in capital cities, we believe this scenario would not be possible unless the ACMA and other stakeholders would be willing to revisit the separation between adjacent carriers in the FM Band. Such consideration is now more feasible given the higher quality and more refined receivers currently available which would enable the possible adjustment of separation between carriers.
- An additional option could be for the ACMA to use its planning powers under Part 3 of the Broadcasting Services Act to repurpose allotments of spectrum that have been planned in a license area plan (LAP), but for which no FM transmitter has been established.
- The issue of urban encroachment and the effect it is having on many AM sites should also be considered during these discussions.
- Some concerns that ANRA has in regard to migrating all current AM services are:
 - The duplication of content.
 - Greater chance of interference from increased number of high powered services with no protection to LPON services.
 - Any change made to the drop through zone 87.5-88.0 MHz.

ANRA would request that if additional space is created in the FM spectrum that a portion of the spectrum be set aside for approved Narrowcasters (both Low Powered and High Powered) thereby delivering greater diversity.

ANRA would not support the taking back of any HPON or LPON licenses in the BSB to make room for AM migration into the FM band.

> **Scenario Two—AM and FM Radio progressively migrates to Digital Radio**

- **Regarding major metropolitan markets** ...As has been well documented, Digital Radio (DAB+) is a viable platform in large metropolitan markets providing an alternative listening platform for existing channels and also providing more targeted special interest channels.
- Interest by consumers in DAB+ in the major urban areas has shown a steady increase in the number of receivers being purchased.
- ANRA's concern is that currently existing Narrowcasters have not been given access to DAB+, even though some of the current DAB+ services could fall within a narrowcast classification.
 - If Scenario two was to be considered in major urban areas, ANRA requests that HPONs and clustered LPONs be afforded access to DAB+.
 - ANRA would also put forward for consideration with DAB+ in major cities, that a channel be allocated for Narrowcasters which could be shared (on rotation) by approved Narrowcasters, including smaller operators who may not otherwise afford to access this medium.
- **Regarding regional areas**...With AM firmly established and operating, ANRA does not believe DAB+ would be a viable option due to the considerable investment in infrastructure/etc needed to service these sparsely populated regional areas, with minimal return on investment.
- DRM has been evolving in many overseas countries into a credible platform with many interesting options that may be able to be run cost-effectively along with the current AM/FM infrastructure. DRM+ can provide clarity of audio with the same propagation efficiency as AM broadcasting.
- ANRA's concerns are that currently existing Narrowcasters have not been given access to DAB+ and may be locked out of DRM+ consideration.
 - ANRA requests that HPONs and clustered LPONs be afforded access to DRM+ if this platform is being considered.
 - ANRA would also put forward for consideration with DRM+ in regional areas, that a channel be allocated for Narrowcasters which could be shared (on rotation) by approved Narrowcasters, including

smaller operators who may not otherwise afford to access this medium.

ANRA does not see Digital Radio having the ability to replace both AM/FM for the whole of Australia unless it is funded/subsidised by the government.

Digital Radio has shown positive signs in take-up by consumers in major metropolitan markets. However, as far as replacing AM/FM in these areas, we feel it would be prudent to continue discussions with current stakeholders to determine if they wish to have their services totally migrated to DAB+. Also the views of the consumers should also be taken into consideration.

ANRA feels that now is the time for HPONs and clustered LPONs be afforded access to DAB+.

ANRA would also like to see DRM+ discussions to be brought forward.

> Scenario Three—Free-to-Air Terrestrial Radio progressively migrates to Online Streaming.

ANRA takes into account that most of the current radio services are also streaming online and have been for quite a while. And not just streaming but also providing content that embraces many other current and emerging online technologies. The consumption of radio listening has been expanded and made more accessible to the consumer with this technology.

However, ANRA feels that in Australia this platform will **never**:

- be able to totally replace the coverage footprint of AM/FM.
- replicate the **local** content, local employment opportunities, local advertising and local listener support of AM/FM.
- have the same reliability of service.
 - It would not be a prudent business decision to rely on Internet Providers or Telcos to provide constant uninterrupted service as they strive to meet the increased demand for bandwidth with more and more devices continually downloading these services.
 - In addition, there are still many “Black Spots” in mobile phone services throughout Australia – even along major highways.
 - Also, it would be imprudent for radio services to rely on third party internet providers to maintain technicians/technical support 24/7, especially in remote areas.

- be regulated to the same degree as the current broadcasting sector.
 - The regulated nature of the Australian radio industry not only helps to give terrestrial radio a high degree of credibility but, more importantly, it ensures Australia has "a voice".
 - Online streaming services originate from anywhere in the world and are very difficult for Australia to regulate without resorting to Internet censorship.
 - Consumers of online streaming services have little or no regard to the geographical source of the broadcast, thus in an "online streaming only" future scenario there is a high risk that Australia would "lose its own voice".

ANRA recognises the positive listener experience online technology has brought to Narrowcasting. Given the niche nature of our programming, listeners are given greater access to our services.

For example, listeners introduced to a low-power LPON service via their car radio (87.6FM or 87.8FM or 88.0FM), can tune in only within the limited range as per the licence conditions. However, thanks to online streaming, listeners can continue to access the service via Mobile App or Internet Audio Stream. However, the initial connection was made locally via FM, not selected from the millions of radio services streaming online.

ANRA sees streaming and digital radio as supplementary services providing additional/alternative means of listening to radio.

The current reach and efficiency AM/FM cannot be undervalued, along with the current receivers readily available. Online streaming should be seen as complementary technology (not replacement technology).

From the experience of our members in radio broadcasting over many years, we believe it is best to be on as many platforms as possible, allowing the listener to choose how they prefer to connect with us.

CONCLUSION

Our members would like to thank the ACMA for the opportunity to participate in these discussions. ANRA supports the initiative the ACMA has taken in investigating possible future scenarios for Radio Broadcasting.

ANRA and its members do not support any movement or changes that adversely affect the Drop Through Zone 87.5MHz to 88.0MHz.

While some future changes may be driven by the consumer market, we need to ensure that optimum reach of radio services is maintained. We also need to ensure viable and reliable delivery platforms that are within the resources of current radio service operators.

ANRA feels that, while an understanding of current overseas trends and developing technology will be part of any consideration on the Future Delivery of Radio Services, we should not be afraid to choose to stay with a mix of platforms that best suits the Australian situation and our safety and security needs.

We look forward to a continuing and positive dialogue.

Phil Edwards
President
Australian Narrowcast Radio Assn
19.07.18

Angelo Nacson
Secretary
Australian Narrowcast Radio Assn
19.07.18