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RESPONSE TO EXPOSURE DRAFT BROADCASTING LEGISLATION AMENDMENT (DIGITAL DIVIDEND AND OTHER MEASURES) BILL 2011

INTRODUCTION

Commercial Radio Australia (**CRA**) welcomes the opportunity to make comments regarding the DBCDE's exposure draft Broadcasting Legislation Amendment (Digital Dividend And Other Measures) Bill 2011 (**Exposure Draft**).

CRA is the peak national industry body for Australian commercial radio stations. CRA has 261 members and represents approximately 99% of the commercial radio broadcasting industry in Australia.

Any changes to the legislation or new planning functions and powers for the ACMA will need to be mindful of the implications for the new and existing DAB+ services.

In order to ensure equity of access for regional Australians to the benefits of digital radio, provision must be made for the broadcasters to offer the same level of quality, range of content and functionality as is now available in the metropolitan markets.

KEY ISSUE 1

In preparing for new Television Licence Area Plans for digital television services in a licence area. The new instruments will have more flexibility than existing planning instruments (licence area plans (LAPs), digital channel plans(DCPs)), and once in force will replace LAPs and DCPs to the extent that they relate to digital television services.

Any changes to the TV Laps need to ensure there is no unintended negative impact on the planning for DAB+- in the VHF Bands


We support the planning flexibility given to the ACMA where an instance like Hawkesdale may no longer need to be protected (or Goulburn) if test services conducted over 12-18 months show that there is limited co-channel interference which can be fixed by the interfering broadcasters (ie the Canberra broadcasters if there were to be any effect on a broadcaster in Cooma Monaro or Goulburn)

In addition Commercial Radio Australia would recommend that the Legislative Amendments consider

- 1) Allowing ACMA to plan for digital radio rollout outside the five cities
- 2) Allow ACMA to develop draft licence area plans for the five cities.
- 3) Instruct ACMA that radio licence area plans should come into force on 31st December 2013 (ie a whole year before the requirement for the TV plans) – to allow the radio industry to start building services straight after analogue switch off. Where spectrum and sites are available and careful planning is in place, there is no reason to delay another year while TV restacks before we can switch on radio services.

Please do not hesitate to contact me for further clarification or information.

Yours sincerely

A handwritten signature in black ink that reads "Joan Warner". The signature is written in a cursive, flowing style.

Joan Warner
Chief Executive Officer