

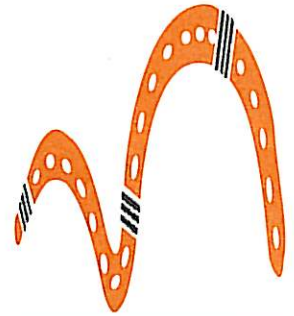
In reply please quote 04/02/03

8 August 2007

Your Reference

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"Mist of the mountains"

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Dear Sir or Madam:

Re: Submission regarding the digital conversion of self-help television retransmission services

I am writing in response to your request for submissions regarding the conversion of existing retransmission services, in particular the site operated by the Murrindindi Shire at Flowerdale/Hazeldene.

Background

Flowerdale/Hazeldene has been identified as a Remote Area site (no. 94) and this I assume is because when Black Spot funding for analogue TV was made available, we were unsure if a Terrestrial TV input signal would be available for this site due to terrain, plus the site had to be established, so it was assumed that from initial tests a Satellite input would be needed.

Having established the site locals in the area watching the new service were very happy to now have a TV service, BUT their was **no local content, no Victorian News & Weather available on the Optus C1 Aurora Platform**. These viewers live in rural Victoria only 60km from the Melbourne CBD, separated by the Great Dividing Range to the south.

Flowerdale/Hazeldene has a total of four (4) TV transmitters, one each for SBS, ABC, Imparja and C7. Many complaints were received about this lack of local content, prompting tests to be conducted to find a local feed. We found adequate Digital Terrestrial VHF & UHF signals were available at the site from Mt Dandenong (Melbourne).

National Broadcaster SBS has no state based service, but the ABC does so the ABC1 Digital Terrestrial Victoria service is now used as the input feed for the Analogue ABC service from Flowerdale/Hazeldene instead of the New South Wales Optus C1 feed.

Being limited to only two (2) Commercial TV services being retransmitted from Flowerdale/Hazeldene Prime(C7) & Imparja it was decided to retransmit Seven Melbourne in place of Prime(C7) as they are aligned together.

Imparja takes both 9 & 10 Networks and this was the best option to leave as the input for the second Commercial service.

Thus Flowerdale/Hazeldene is currently retransmitting SBS & Imparja Optus C1 feeds along with Seven and ABC Terrestrial feeds from Mt Dandenong on VHF.

Since the UHF TV Retransmission service was installed, both ABC Regional and local Community Radio (3UGE) have established FM Radio retransmission services from this site, providing local & regional news, information and weather, further cementing the reliance on this facility.

If the Terrestrial Digital TV upgrade were to go ahead for this site, spectrum and provision would need to be made for all Nation and local Victorian Commercial services to be retransmitted from Flowerdale/Hazeldene with input from Mt Dandenong.

It is submitted that the Flowerdale/Hazeldene Retransmission site should be reclassified to a Regional area site from a Remote area site for the above reasons.

Re: Comments sought on the following issues:

1. *Whether the use of individual digital transmitters for each service or the use of multiplexors would be the most effective option for converting existing analogue self-help retransmission sites to digital in relation to:-*

1.1 Technical Viability

This facility has the capacity to accommodate additional equipment from a building, tower and mains power capacity for digital TV.

An air conditioner would need to be fitted for use in warm weather, and the building has provision for this.

The transmitter output power would need to be increased to improve fringe area reception problems for the Flowerdale/Hazeldene service area.

1.2 Cost of conversion, operation & maintenance

Without support by way of Federal Government funding the cost for the community to fund conversion service would be prohibitive. The general community already believes that free to air TV should be just that, why should they pay for something that is supposed to be free.

Currently the site is managed by the Murrindindi Shire Council, and receives a small amount of remuneration in site fees from a commercial site user that helps to operate and maintain the existing Analogue service. Depending on reliability and maintenance costs of new Digital TV transmitters it is difficult to say whether this remuneration would be enough.

The Federal Government should be made aware of the huge ongoing maintenance costs to councils and community groups that have installed these retransmission sites. These costs include insurance, licence fees and power to repair costs for technicians to remote locations, technical ability of some organisations, cost of replacement equipment and site fees.

ACMA Licence fees should not be charged for these services.

It is submitted that the Federal Government should have an ongoing fund to help maintain at least the cost of replacement equipment for these retransmission sites due to the amount of money required to replace an unserviceable transmitter or antenna and feeder, not to mention the cost of the rigger and technician.

The cheapest option for digital conversion would be a single multiplex transmitter with all the basic metropolitan services on board for each state of Australia, such as ABC, SBS, CTV, Seven, Nine and Ten networks.

This would at least give some local service for each state receiving a remote satellite service for retransmission or DTH reception.

1.3 Other options for self-help TV retransmission sites.

Individual transmitters from a maintenance point of view are a much better alternative to one single multiplexed transmitter. The reason being, that if an individual transmitter fails only that service is affected until repairs are made, and subsequently viewers are not badly disadvantaged with the temporary loss of a single transmitter, other services remain on air.

Spare transmitters are essential to continuity of service, but are usually designed for each individual service channel, so one for each service would need to be kept for shorter disruptions to service while repairs take place.

When a Multiplexed TV transmitter, if cheaper than multiple individual service transmitters, was used a spare transmitter for each multiplexed service would be essential as a failure would mean loss of all services on that multiplex until repairs were made. Viewers get rather upset when their TV does not work.

Also a list of ACMA preferred or approved Digital TV equipment would be helpful as some type approval of this equipment may reduce interference and site issues for many self-help retransmission providers.

2. *Whether the DTH option for viewers residing in remote areas of Australia where the population is less than 500 should be adopted, rather than converting existing self-help retransmission sites from analogue to digital.*

I believe that the minimum population should be under 100 residents. Criteria for Black Spot TV funding was originally under 200, which was reduced to under 100 towards the end of the program. The itinerant population should also be included in statistics when counting the population.

Unfortunately the problem is that many of the self-help Analogue TV Retransmission sites should never have happened. Delivery should have always been via a DTH satellite. This leads to the next problem in that there is not enough State or Regional "Local" "Free to Air" service Channels. There is no Victorian or Tasmanian ABC TV service and Commercial services are Queensland and Northern Territory based. This is the single biggest complaint and needs to be addressed before anyone even thinks about forcing viewers to DTH Satellite, especially in the southern states.

There has been substantial work undertaken to put infrastructure in place at many Retransmission sites, including the Flowerdale/Hazeldene site. To abandon them now would be a waste of work and resources. Most viewers have installed antenna's to receive these local TV transmissions.

Satellite dish antenna would have to be installed and decoders purchased for DTH Satellite costing many hundreds of dollars instead of the purchase of a Terrestrial Decoder at a current price of around \$99.00 each that most viewers are able install themselves.

The Flowerdale/Hazeldene viewers would certainly have major issues with a return to a DTH Satellite service unless the local content issues are addressed first for satellite.

This site would not be abandoned if these issues were addressed and DTH Satellite became an option, because as mentioned earlier Local Community and ABC Regional FM Radio services have been established at this site.

3. *Timing of digital self-help retransmission site conversion*

If funding is to be made available, similar to the Black Spot TV funding, time constraints on the installation and delivery of equipment need to be flexible as with the Black Spot program the availability of equipment and suitable installers was extremely limited and meant that preferred suppliers and installers could not meet delivery dates for funding.

Summary

That the Flowerdale/Hazeldene service be zoned as a Regional Service and that Federal Funding be provided for the conversion to Digital TV and that an on going equipment replacement program be put in place.

Also that the minimum number of residents be 100 before DTH Satellite be considered and only a lesser figure if more State or Local Regional services are included on the Satellite TV service.

The Flowerdale/Hazeldene Retransmission site continue to Broadcast Analogue TV services until funding is made available for digital conversion or more DTH Satellite services with local content are provided before the Analogue TV services would cease.

Self-help Retransmission sites to be federally funded for the Digital TV conversion and to include a backup spare transmitter if single multiplex is used for each site, with access to an ongoing equipment replacement fund to replace non repairable Retransmission equipment, as in many cases it is beyond the ability of the self-help groups to fund these items.

When determining the numbers of residents for population the itinerant population needs to be taken into account and all houses should be counted.

Provide a single multiplex transmitter with all the basic metropolitan services on board for each state of Australia, such as ABC, SBS, CTV, Seven, Nine and Ten networks. This would provide local service in each state for receiving a remote satellite service for retransmission or DTH reception.

Yours faithfully



D. D. Hogan
Chief Executive Officer