



AUSTRALIAN NARROWCAST RADIO ASSOCIATION

Response to the

ACMA DIGITAL DISCUSSION PAPER

February 2014

Introduction

The Australian Narrowcast Radio Association (ANRA) represents the licensees of 840 low power open narrowcast (LPON) radio services and 170 high power open narrowcast (HPON) radio services located across all States and Territories.

ANRA welcomes the opportunity to comment on issues canvassed in the Australian Media and Communications Authority (ACMA) discussion paper on Digital Radio

General Observations

ANRA notes that most of the issues raised in the discussion paper have some relevance to aspects of Narrowcasting.

With hindsight it is highly questionable whether the architects of the Narrowcast sector would have realised the importance of the role Narrowcasting services would come to play in the lives of many Australians, catering to needs which would otherwise go unsatisfied.

ANRA contends that after 20 years Narrowcasting has become a discrete, established and mature sector of broadcasting which, while acknowledging the primacy of the national, commercial and community sectors, warrants an inclusion in any future planning of broadcasting in Australia.

For that reason we are pleased that ANRA has been asked to respond to the Digital Radio Discussion paper.

Following are the specific questions posed in the discussion paper and ANRA's responses to them

Questions:

1. Is the licensing and planning framework for digital radio operating effectively? Should any changes be made to the regulatory framework?

ANRA has no problem with the way the current system is operating in these early stages although we believe Narrowcasters ought to be included in any future expansion of Digital Broadcasting.

2. Should the provisions concerning the commencement of digital radio services be modified or removed, allowing broadcasters to commence services whenever they wish (subject to spectrum planning considerations)?

ANRA contends this ought to occur.

3. Is the access regime established in Part 3.3 of the Radiocommunications Act operating effectively? Is the system of access undertakings working as it should?

It would seem to be.

4. Should any of the provisions relating to the access regime be amended or replaced?

ANRA believes that Narrowcasting ought to be included in the access regime.

5. Are the reasons for a moratorium on new licence area planned commercial digital radio licences still valid? Should the moratorium, which is due to expire on 30 June 2015, be extended or discontinued?

ANRA believes the moratorium should not be extended.

6. Should there be any changes to the initial restricted datacasting framework?

Changes ought to be made to enable Narrowcasters to apply for and operate restricted datacasting services such is the nature of Narrowcasting to provide niche services.

7. Given that the ACMA has not issued any restricted datacasting licences, is there any future for such services?

ANRA would like to see the possibilities for such services to be available to Narrowcasters

8. How can restricted datacasting be made more attractive to new entrants to the market?

By the allocation of such services to interested Narrowcasters

9. Should there be additional spectrum allocated for restricted datacasting services?

ANRA is of the belief that such spectrum ought to be made available for Narrowcasters to provide their services on the digital platform.

10. What is your assessment of the trends in digital terrestrial radio technology? Does the overseas experience with these technologies have anything to teach us about their merits and appropriateness in the Australian environment?

ANRA believes the practice of digital services being complimentary to current analogue services best suits the Australian scenario.

11. What are your views about the impacts of smartphone and other streamed audio services on the future of 'traditional' radio listening? What data do you have to support these views?

Obviously new technologies need to be utilised by all sectors including Narrowcasters with digital services being complimentary to smartphone and other streamed audio services.

12. Given its importance in the radio listening environment, what digital radio technologies are likely to be adopted by car manufacturers in the short to medium term?

We have no expertise in this area.

13. What impact, if any, will the intent of several car manufacturers to install internet-connected entertainment systems have on the future of digital radio?

We have no data to make a comment on this area.

14. If you import or sell receivers, are you aware of any new developments which may have applicability in the Australian market? If so over what timeframe?

ANRA is concerned that many Digital radios do not include the AM band on their receivers thus putting Narrowcasters at a decided disadvantage.

15. Given its ability to cover large geographic areas, do you think satellite radio may have a future in Australia?

ANRA is of a view that Satellite Radio might be a future opportunity although considering the American experience we fear it might not be commercially viable with our relatively small population.

Already a number of Narrowcasters including UCB, TABCORP, and RAW FM are using Satellite delivery for networked Narrowcasting services.

We note with interest that in a submission made in 2011 Asia Space PTY LTD in Australia expressed interest in providing satellite to terrestrial delivery of DAB+ and DRM digital radio services with current and new technologies being developed

- 16.

Have you conducted or commissioned any research into digital radio audience figures or the demographics of digital radio listeners since digital radio services commenced in 2009? If so, what are the current and projected audiences for digital radio?

N/A

17. Have you conducted or commissioned any research into the growth in streaming radio services across online platforms and connected devices including mobile phones, tablets or desktop computers? If so, what are the current online radio audience figures and the demographics of listeners? Do you have any research on the projected growth of these digital radio technologies?

N/A

18. Are there alternative allocations of spectrum the Government could be considering for terrestrially based digital radio?

We are not aware of any alternative spectrums that might be available.

19. What has been your experience of the establishment and operation of a digital radio multiplex? Are there alternative arrangements for sharing multiplexes which would be more efficient, particularly in regional areas, where there are generally fewer services than in metropolitan areas?

ANRA contends that Narrowcasters in Metropolitan and Regional areas ought to be included in any digital service planning and that provision for narrowcasters to participate be included in any planning deliberations.

20. Is the current regulatory and technical framework for digital radio best suited to providing digital radio in regional and remote Australia? What mix of features (for example, range of services, signal/population coverage) is desirable?

Again ANRA contends that Narrowcasters ought to be able to participate in the digital radio mix in regional areas.

21. In order to maintain audio quality, should there be a mandatory minimum amount of bandwidth used per station?

As ANRA understands the situation existing digital radio legislation provides a standard access entitlement for each commercial broadcaster to use one-ninth of the transmission capacity of a Category 1 digital radio multiplex. Each entitlement equates to a net bit rate for usable data of approximately 128 kbps. ANRA contends that the same access entitlement ought to be made available to Open Narrowcasters so that more choice and higher quality are available to all and not a select group.