

20 June 2014

The Project Manager
Spectrum Review
Department of Communications
GPO Box 2154
CANBERRA ACT 2601

By Email: spectrumreview@communications.gov.au

SPECTRUM REVIEW – TERMS OF REFERENCE CONSULTATION

Thank you for the opportunity to comment on the draft Terms of Reference for the Department of Communications Spectrum Review. We commend the timing for the review as spectrum both here and internationally is becoming a finite resource.

Australia has an excellent record of careful spectrum management and is used in the region as a useful reference for planning of services and the avoidance or minimisation of interference.

CRA broadly agrees with the proposed terms of reference with one proviso – there needs to be an explicit statement that the frequencies currently allocated for broadcasting in the broadcasting services bands and elsewhere should be exempt from the spectrum review for the following reasons:

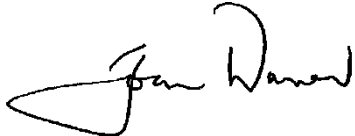
- broadcast infrastructure has been identified as a key part of Australia's critical infrastructure and broadcasters have invested heavily in building resilience to ensure they stay on air in times of crisis and emergencies;
- studies from the EBU, Sweden, Germany and Australia confirm that, at this stage, there is no technology platform which has the coverage, robustness, reliability or the resilience to replace terrestrial broadcast radio;
- 146MHz of broadcasting spectrum has already been released and the Government has raised a \$2billion digital dividend as a result but there is still a good part of the 800MHz (digital divided) band that has not been sold;
- frequencies in the 800MHz band where broadcasters have their studio transmitter links have been reallocated as part of the digital dividend and there have been substantial costs to broadcasters for the replacement of all wireless microphone equipment resulting from the digital television restack – none of this has been compensated by Government;
- broadcasting spectrum around the world is being squeezed by the extraordinary growth of mobile communications but the integrity of, and access to, robust free to air communications channels for citizens, such as radio, should not be compromised;
- broadcasting unions in the Asia Pacific, Europe, Africa and North America are aware of, and are in discussions with, broadcasters re the need to defend broadcast spectrum against mobile network operators' unending and insistent demands for more spectrum;
- as cities become more densely populated, broadcasters need to use a combination of high power/high tower and low power/low tower repeaters and translators to ensure reception so spectrum must be available to allow free to air broadcasters to achieve expected coverage;
- the radio industry requested 21MHz of Band III spectrum and received just 14MHz for regional digital radio rollout. Until the current allocation of 14MHz of Band III spectrum for digital radio in regional Australia is planned in detail it is unclear if it will be sufficient for future digitisation of radio and/or if other spectrum may be needed to supplement this 14MHz allocation in Band III – for example, L-Band.

Where spectrum sharing and reduction in the requirements relating to interference management are proposed, CRA encourages Government to consult widely and to ensure adequate due diligence and technical trials are completed **prior** to permanently licencing new allocations or changes of spectrum use for new technologies.

CRA would welcome the opportunity to participate in the Department's spectrum review consultation and to participate in any forums on this subject.

You can contact me at joan.warner@commercialradio.com.au or on (02) 9281 6577

Yours sincerely

A handwritten signature in black ink, appearing to read "Joan Warner". The signature is fluid and cursive, with a large initial "J" and "W".

Joan Warner
Chief Executive Officer, Commercial Radio Australia