



FreeTV
Australia

44 Avenue Road
Mosman NSW
Australia 2088

T : 61 2 8968 7100
F : 61 2 9969 3520
W : freetvaust.com.au

1 July 2005

Mr Greg Cupitt
Director Planning
Planning Branch
Australian Broadcasting Authority
PO Box 34
BELCONNEN ACT 2616

Dear Greg,

Spectrum for Digital Radio Discussion Paper

Free TV Australia (**Free TV**) welcomes the opportunity to comment on the Australian Broadcasting Authority (**ABA**) discussion paper on Spectrum for Digital Radio.

Our comments are guided by a concern to ensure that Australia viewers are able to continue to receive their traditional Free TV services without interference.

General Comments

- Planning for digital radio services must take into account existing television services in those bands and the likely impact of digital radio services on viewers' ability to receive their television services without interference.
- Any consideration of the allocation of spectrum following the simulcast period of the Digital Television Conversion and whether there is any need to modify the ABA's channel plan is premature on the basis that:
 - roll-out of DTTB is not yet complete;
 - it is not clear when the simulcast period will end, either in Australia or overseas. In Australia the BSA provides for separate review of the issues associated with the length of the simulcast period before 1 January 2006; and
 - a number of technical planning issues with respect to DTTB are yet to be determined both domestically and internationally.
- Planning in Band III is of particular concern because of the potential for interference into existing television services in a band which is already under pressure from competing technologies such digital multi-media broadcasting and IMT 2000(3G).
- The identification of candidate bands must take into account the estimated demand for spectrum for radio and television broadcasting. Options for candidate bands for digital radio should take into account the future demand as well as the replacement of current requirements.
- Options for the VHF bands I, II and III must consider the likely impact of the outcomes of the Regional Radio Conference 2006. While this conference is focussing on broadcast planning in Region 1 for the VHF band, its outcomes are likely to drive the standardisation framework for design and manufacture of DSB transmission and consumer electronics equipment for a 50Hz environment.

- Planning in Australia for the implementation of digital sound broadcasting (DSB) in bands currently allocated to digital terrestrial television broadcasting (DTTB) must be in accordance with the preceding standards, protection requirements and planning established for DTTB.

Planning Mechanisms

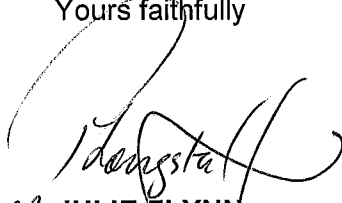
Considering the experience gained during the transition to digital terrestrial television broadcasting in Australia and given the ABA's comments in the discussion paper that "in contrast with the digital conversion of free-to-air television, shortage of suitable spectrum is likely to be a significant constraint on the development of digital radio in Australia,

Free TV recommends that the ABA consider

- An extension of the activities of the Digital Channel Planning Consultative Group to cover the planning and implementation of digital radio broadcasting; and
- An extension of the Interference Management Scheme for the likelihood of co and adjacent channel interference to broadcasting services in accordance with the principles in the Technical Planning Guidelines.

Free TV broadcasters have co-operated with the existing digital radio trials and remain committed to co-operating with the digital radio planning processes in the future to ensure a successful migration which does not interfere with existing digital television services.

Yours faithfully


PP **JULIE FLYNN**
Chief Executive Officer