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10 October 2008

The Manager  
Policy and Research Section  
Spectrum Planning Branch  
Australian Communications and Media Authority  
PO Box 78  
BELCONNEN ACT 2616

Dear Sir/Madam

#### **DRAFT AUSTRALIAN RADIOFREQUENCY SPECTRUM PLAN 2009**

Free TV welcomes the opportunity to comment on ACMA's draft *Australian Radiofrequency Spectrum Plan – including General Information* (the Spectrum Plan). We apologise for the delay in responding and appreciate ACMA's willingness to accept our comments after the formal close of consultation.

Free TV notes that on pages 87 and 88 of the Spectrum Plan, the UHF Band appears over two pages, with the frequency ranges 470-806 MHz and 806-890 MHz appearing separately. This is in contrast to the single-page depiction of the UHF Band in the *Australian Radiofrequency Spectrum Plan 2005*.

We understand from discussions with Mr Stewart White of ACMA's Spectrum Planning Branch that the change in depiction of the UHF Band has arisen from a change in the overall formatting of the Spectrum Plan from portrait to landscape.

Given the split depiction of the UHF Band in the Spectrum Plan resembles regulatory arrangements in other countries and could thus cause confusion, Free TV requests ACMA revert to the previous portrait-style formatting of the document. This would presumably enable the UHF Band to be depicted in a single page and therefore avoid the possibility of any misinterpretation or misunderstanding by users of the document. This would also retain consistency with the formatting style used by the International Telecommunications Union.

Free TV has also discussed with ACMA the inclusion of footnote 5.317A (WRC-07) in *Column 2: Australian Table of Allocations*, on page 87 of the draft Spectrum Plan. Given the reservation placed by Australia on this issue at WRC-07, we believe the footnote has been included in error and request its removal from the final version of the Spectrum Plan.

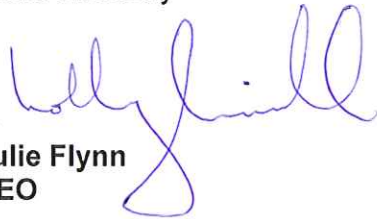
Free TV further notes an apparent typographical error on page 217 of the Spectrum Plan, which lists International Footnotes and includes footnote 5.313A (WRC-07). Free TV notes the band

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edge is denoted in bold as **689 MHz**, rather than **698 MHz** as set down on page 24 of the Final Acts of WRC-07 and suggest this error be corrected in the final version of the Spectrum Plan.

Thank you once again for the opportunity to comment on the Spectrum Plan.

Yours sincerely

  
per Julie Flynn  
CEO