

CADENCE FM 99.3
92 WELLESLEY ST
SOUTH HOBART TAS

Broadcasting Inquiry

Dear Sir, Madam

Concerning your request for submissions at forthcoming enquiries into the Broadcasting Industry.

A number of issues we would like to discuss are outlined in your paper ie Issues Paper March 1999 however they already have borders that sort of prevent any further discussion.

The matter of frequency allocation is a self perpetuated myth by government and your paper does little to invite any change. In saying that frequency spectrum is scarce, what justification are you using? The ABA use the rationale that NTA (or now that it has been sold what can community Broadcasters expect?). Co channel broadcasting from the one site must have 800khz spacing. I agree this is fine for the same mast however it is grossly unfair to community broadcasters to put up with this. Your attention is drawn to selected papers on Fundamentals of Frequency Modulation where E.H. Armstrong * **FM's Inventor** * states that 2 channels can happily broadcast as long as their co-channel frequency separates by the upper audio spectrum ie 20 kHz in the case of stereo transmission by 76 kHz so that DSB sidebands can be reproduced. The easiest here is by 100 kHz steps to satisfy conventional receivers distinguishing each station. Basically stated there is space for 10 stations every million cycles MHz. The 88 to 108 MHz band occupies 20 MHz. Therefore there is actually space for 200 channels! Rather than the 25 that is calculated from 800khz spacing.

Secondly, the Federal Government is pushing for conversion to digital broadcasting. With no semiconductor industry in Australia a huge opportunity to employ Australians is going missing. The Electronics Industry whilst expressing glee at the financial returns is very aware of the limitations of PCM (Reeves 1932) where sampling (Nyquist) and clocking are of paramount importance. With our government on a plan of 'lets do it anyway' community broadcasters are once again having to reach into their pockets to try and afford conversion. The plan by government to financially restrict access certainly needs addressing. IE- Sure the TV stations are propaganda advertising their hopes for digital (WIN TV 1998 MAR – SEPT) but where does this leave the small community station?

Thirdly Cadence FM is restricted by its licence to an ERP of 15 watts which is ridiculous. A FM service that actually wants to communicate with a community cannot operate under 100 watts minimum. We have been advised by the ABA to obtain a propagation assessment. We obtained a quotation for this at a cost of \$4000 for one day – its yet another case of suppression by the ABA of community radio. Some agreement on minimum status of licences needs addressing.

Yours sincerely

Chris Daly
President
Cadence FM