

SUB NO - 72196
ID NO - 2146

HOT FM



106.7 FM Mildura 90.7 Robinvale & Wentworth 87.8 Coomealla

Broadcasting Live <http://www.hotfm.org.au>

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"Keeping the community informed and entertained"

SUBMISSION TO PRODUCTIVITY COMMISSION

1. SHOULD NARROWCAST LICENSES BECOME COMMERCIAL:

An open narrowcast license is able to broadcast commercials (unlimited) but according to the commercial radio industry, are not permitted to call themselves a commercial radio station. (see enclosure).

But Commercial stations can run on Narrowcast licenses. For example, Sport 927 in Melbourne (racing station) operates on a commercial license in Mildura, but on a narrowcast license in nearby Swan Hill. Both stations transmit the same program.

However, it is our belief that some aspects of Narrowcasting should be retained.

- (a) restricted in area served or
- (b) restricted to lower power
- (c) restricted in program format, but providing that the format chosen is not in use by the existing commercial operators in the designated service area. This would allow for more program diversity.

One watt stations should be either be phased out, or increased to 10 watts to make them more serviceable for the public (consumer). They are very, very limited at one watt and are generally sub-standard technically.

END OF THE FIVE YEAR LIMIT:

Because of the investment involved to properly set up and operate a station, the licenses should be subject to review by the ABA, similar to other licenses (commercial and community).

Fees should relate to income, similar to what is charged for music rights or should be proportionate to the power or coverage area compared to the main serviced station in the area.

(2)

UNLIMITED STATIONS IN THE SAME MARKET:

There is growing concern at the loss of Australian ownership. In Mildura the English based DMG group owns the two commercial radio station licenses on the FM band. Their person who acts as one of their agents and former owner of these two stations, operates the Third commercial license.

Ownership limits, in regard to commercial licenses, should be restricted to a certain number in each service area.

GREATER USE OF THE BROADCAST SPECTRUM:

Sadly, a number of talk stations, including National Broadcasters and some ethnic broadcasters and specialist racing broadcasters, occupy the FM band.

They should be encouraged to return to the FM band. Additional licenses could become available by extending the AM band from 1600 to 1700 as per overseas.

It is in this section of the band that overseas experiments in "super AM stations" (extended coverage and improved quality) are being conducted.

As a matter of urgency, the 1600 to 1700 section should be added to the spectrum before speculators take up the off-band frequencies without any intention of taking up services.

The removal of Television from the FM band in South Australia is desperately needed to free up the FM band and make more spectrum available.

Likewise, developing a system of HIGH POWER (50 to 100,000 watts); medium (1000 to 20,000 watts) and low (under 1000) would allow for better multi-use of the one frequency especially on FM. Perhaps some clear channel AM frequencies can be developed for National Broadcasting.

APPENDIX



Star

TODAY'S BEST MUSIC

Mr Max Thorburn
6 Byrne Court
Mildura
Victoria 3500

9/11/99

Dear Mr Thorburn,

I write to you in reference to your use of the term "commercial radio station" during your daily programs on the open narrowcasting service 1359AM.

Your service is not licenced as a commercial radio station.

Representing yourself as a "commercial" radio station under the Broadcasting Services Act and the Trade Practices Act is incorrect.

You are in breach of these laws when you use the term "commercial" to describe your station's identity.

We therefore request that you cease referring to your open narrowcasting service 1359AM as a "commercial radio station" both on air and off air.

If you do not cease this conduct we will take appropriate action and will refer the matter to the ABA and ACCC.

Yours faithfully,

A handwritten signature in black ink, appearing to be "Glenn Holmes". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Glenn Holmes,
General Manager,
3MAFM / StarFM