Productivity Commission LB2 Collins St East Melbourne Vic 8003.

DRAFT RECOMMENDATION

NARROWCAST LICENCE PERIODS AND TRANSFERABILITY

Dear Sir/Madam,

Thank you for inviting WOW FM to comment on the Productivity Commissions Draft Recommendation for Narrowcast licences.

WOW FM agrees with the commissions recommendation that, spectrum currently regarded as "narrowcasting" should be made available using the same processes and on the same terms (including renewability) as spectrum for commercial broadcasters.

WOW FM currently has two high powered narrowcast licences and an expensive capital structure in Townsville and Mackay. WOW FM feels that the current five year period for our licences with no right of renewal is too short and provides an unsatisfactory and risky frame work for broadcasters like ourselves and our audience, when in five years the ability to use our asset could be easily be lost.

WOW FM congratulates the commission and looks forward to seeing the draft recommendations regarding narrowcast licences implemented.

Yours truly,

DALE PARKER ANDERSON

WOW FM.



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