# These submissions are presented by the

# Australian Racing Radio Association

to the Inquiry by the

# **Productivity Commission**

Into the Broadcasting Services Act 1992,
Broadcasting Services (Transitional
Provisions and Consequential
Amendments) Act 1992, Radio Licence
Fees Act 1964 and the Television
Licence Fees Act 1964.

#### **Definitions.**

#### **Racing Radio**

The broadcasting of racing events by thoroughbred gallopers, Standardbred harness horses, Greyhounds, and various Sports on which wagering is available by the TABs in all Australian States and Territories.

#### The Australian Racing Radio Association

An Association of the broadcasting stations which broadcast racing events and which join together to discuss matters of common concern in the areas of Technical, Programme, Sales and Administration. The members of the Association are:-

NSW Radio 2KY
VIC Sport 927
QLD Radio 4TAB
SA TAB Radio
WA Racing Radio
TAS Radio 7TAB
NT Radio 8TAB
ACT Radio 1SSS

#### History

The broadcasting of races in Australia, up until the end of the decade of the 80's was carried jointly by Commercial stations and the Australian Broadcasting Commission.

Commercial stations in each Capital City and in most major provincial cities and towns carried the racing programme which consisted principally of Saturday afternoon programming. Similarly the ABC catered nationally through it's network of transmitters.

During the decade of the 80's the service throughout the provincial areas of the country began to dwindle on the commercial networks, as racing was seen to be delivering a smaller audience than was available with other formats. The demand by the edicts of the then Broadcasting and Television Act 1942 that programmes were to be "adequate and comprehensive" was seen to be met by virtue of the fact that the ABC still provided a nationwide service

In the early 80's the TABs began to contribute to commercial stations in order to gain extended coverage and greater detail for their product. Midweek coverage of races began to happen on a regular basis.

The first purchase of a radio station by a TAB happened when the South Australian TAB purchased Festival City Broadcasters, which owned the licence of 5AA.

Today TABs own broadcasting licences, both commercial and narrowcasting in South Australia, Queensland, Western Australia, Tasmania and the Northern Territory with major TAB funding supporting the broadcasting of races in all other states and Territories.

The growth of racing radio has been such that the ABC used it as part of it's rationale for withdrawing from race broadcasting in mid 1998.

Racing Radio today provides full coverage of racing, seven days a week, based on meetings covered by the TAB in each individual State.

#### The Growth of Racing Radio.

With the provision of funds from TABs the provision of racing radio services developed throughout the decade of the 80's. It was, however, restricted to the Capital cities. It's ability to spread beyond metropolitan boundaries was stifled by the unavailability of suitable broadcasting licences throughout provincial Australia.

In the very late 80's and early 90's licences for special purposes were made available on a power level lower than traditional licences. Known as LBLs these licences presented the opportunity for race broadcasting to expand out from the confines of the metropolitan areas.

In 1992 the advent of the Broadcasting Services Act brought the ability for narrowcasting to be established and as race broadcasting was able to fall within the definitions promulgated for narrowcasting it was a natural vehicle for expansion.

At approximately the same time the issuing of Low Power Open Narrowcasting (LPON) licences in the 88 MHz band under the Radio Communications Act provided a further vehicle.

Licences issued under the LBL provisions have since been brought under the "narrowcast" provisions of the Broadcasting Services Act 1992.

Thus, Racing Radio is carried on either a Commercial or Open Narrowcast or Community licence, and in one instance on an Experimental Digital Audio Broadcast licence.

Racing Radio in Australia today is carried on the licences listed in addendum "A" and this shows there are 6 Commercial, 72 Open Narrowcasting, 185 Low Power Open Narrowcasting, 1 Community station and 1 Experimental station providing the service.

A total of 265 licences.

The ownership and control of these licences ranges from Companies, State or Territory TABs, individual entrepreneurs, community groups and local government organisations.

#### **Submission One**

We respectfully submit, that the regulations covering the renewal of an open narrowcasting licence should be framed in such a way, that the existing licensee can have a reasonable expectation that the licence will be renewed, given that during the licence period all regulations and conditions of the licence have been observed.

We submit that of the four types of licence currently being utilised by Racing Radio, namely

- 1) Commercial
- 2) Open Narrowcasting
- 3) Low Power Open Narrowcasting (LPON)
- 4) Community

it is only Open Narrowcasting licences issued under the provisions of Section 34 of the Broadcasting Services Act 1992 where there is no reasonable assumption that renewal will occur.

Under the provisions of Section 34 the Australian Broadcasting Authority are given the discretion to release sections of the frequency spectrum for a number of uses, one of which is Open Narrowcasting. The ABA has the responsibility to determine the period that will be available for such a release. Section 34 also indicates that such spectrum will only be available where it is not required for other broadcasting purposes.

It is the opinion of this Association that at the time Section 34 was drafted it could not reasonably have been seen how much of the spectrum released for Open Narrowcasting would be taken up by Racing Radio.

As Open Narrowcast spectrum was made available, and as the ABA's planning process proceeded, the ABA took advice from Spiegleman Q.C. who gave the opinion that spectrum for Open Narrowcast should be taken into account in the planning process. The obvious inference being that if Open Narrowcast was taken into account the future use of the spectrum for the area under discussion would be more accurately defined.

Addendum "B" shows that Racing Radio accounts for 73.6% of the Open Narrowcast licences issued to the 11<sup>th</sup> March 1999 under the provisions of Section 34 of the Broadcasting Services Act 1992

As the matter stands at the moment spectrum that has been "dropped through" for Open Narrowcast purposes has a life of varying proportions in areas where the planning process has not started or is in progress; and for a period of five years where the planning process has been finalised and the frequencies have been subject to the price based allocation system established by the ABA.

To our knowledge there has not yet been a renewal for an Open Narrowcast licence that has been issued under the price based allocation system.

No procedure for the renewal of such a licence has been enunciated.

There has been the occasion where one of the early LBL licences was converted to an Open Narrowcast licence and then issued under the price based allocation system, at which time the incumbent licence holder was outbid at auction and had to cease the racing service that had been provided for a number of years. The licence then passed into the hands of a company who had not participated in the planning process for the area, had not announced what it's proposed service may be, had not published any evidence that it had researched the acceptability of whatever service it was proposing to provide, nor had the local community been canvassed as to whether the new service would be acceptable given that it would come at the expense of an existing service.

The importance of Racing Radio to the community, particularly in rural areas of Australia, has increased by default.

Admittedly the seven day a week provision of racing programmes added to its popularity immediately. But, of greater significance, the fact that the ABC saw fit to remove it's service has increased the importance placed in the Racing Radio product. The reaction to the ABC move was immediate and hostile. Racing Radio in all states received demands for more and more coverage in to rural Australia. State and Federal Members of Parliament were exhorted to lobby to have the ABC service reinstated. The clamour still goes on today from some of the far flung areas of the country.

The keenness of some communities to receive the service can be ascertained by perusing the list of licence holders. There you will see the names of local authority bodies who have taken the time and trouble to gain a licence for their local area. Generally the parent Racing Radio station in each State will provide programme to this category of licensee at no charge to ensure the service is properly provided.

We submit that there is a reasonable expectation amongst the public of Australia to be able to access a radio broadcast of events covered by their State TAB in most parts of the country. The State TABs and Companies involved in Racing Radio have invested substantial funds in expanding their networks to meet this need where possible; and future plans indicate they are prepared to further this coverage.

The economics of the Open Narrowcast class of licence make it the most obvious vehicle to enable the further proliferation of the service. If, however, the licence holder has to face the possibility of an auction system every five years, two major deterrents appear on the horizon.

- 1. Why establish what is, in some cases, an expensive capital structure when in five years the ability to use the asset could be easily lost to another player who puts a value on the licence for economic reasons of their own and not necessarily for reasons that are acceptable to the community it serves.
- 2. Why establish a rapport with listeners in an area when the possible removal of the service in time will provide sizeable angst between the licence holder and the community.

We submit that communities in Australia which enjoy a Racing Radio service would not want that service removed.

We submit that Racing Radio licence holders should be able to have a reasonable expectation that their licence will be renewed.

We concede that to make that happen there needs to be developed a method of establishing a fee for the renewal and extension of the licence.

In the Terms of Reference for this inquiry the Commission is asked to have regard to competitive principles, taking into account benefits to the community as a whole. The basic tenant of Open Narrowcast licences is that they are issued on a limited tenure basis in order to always allow access to aspirant broadcasters within the limitations of available spectrum. The Government has always regarded these licences and the regimen for allocation as a 'competitive' practice

Our submission contends that, for various reasons, Racing Radio has become a sizeable part of the broadcasting scene in Australia, and a part in which the Australian community has an expectation of some permanence. If the existence of Racing Radio and the principles of Open Narrowcast licences seem to be at odds, then perhaps the creation of a special class of licence for Racing Radio may be worth some consideration.

## **Submission 2**

We submit that the holder of a broadcasting licence should not be able to hold a licence without operating it.

We believe there should be a "Use it or Lose it" policy with regard to all broadcasting licences.

This submission stems from the fact that licences in the 88 MHz band (that is 88 MHz, 87.6 MHz and 87.6MHz) which are available for Low Power Open Narrowcasting are under the control of the Australian Communications Authority have been bought up in bulk by individuals and in many cases were not used.

We believe individuals who own these issued, but unused, frequencies fall into two categories.

- Those who saw the entrepreneurial opportunity to buy up and then either sell off or lease the licences at a later date.
- Those who intended to establish stations or networks and who later found the capital or operating costs to be beyond their means.

The commercial entities who are providing a Racing Radio service have found themselves paying up to several thousand dollars per year to use some of these licences that currently would cost the owner an application fee of \$252 and an annual fee of \$37. But that's commercial reality and those organisations are not being forced to use these licences.

Where the matter becomes inequitable is where local community interests either cannot access or cannot afford to access these licences even though they are not being used; or are having to pay fees well in excess of the cost of the licence.

The community acknowledge that the frequency spectrum is a finite and scarce resource and we don't believe the government should sanction individuals being able to withdraw and keep withdrawn sections of this resource.

We don't believe the government ever intended profiteering purely from using broadcasting licences as a tradeable commodity without and obligation to see the resource is used.

The potential exists for a current licence holder with a licence governed by the Broadcasting Services Act obtaining and withdrawing from service a number of these licences simply to keep competition away from his door.

We believe this breaches the spirit of "best use" of the frequency spectrum that had, until recently, operated in this country.

Any broadcasting licence issued under the Broadcasting Services Act 1992 carries with it a condition that stipulates a time within which the service must be established, or the licence may be withdrawn.

We believe the same provisions should apply to all licences for broadcasting purposes irrespective which regimen controls their issue.

## ADDENDUM "A"

### Racing Radio Stations in Australia

NSW Existing				
Location	Licence Holder	Licence Type	Frequency	Power
Albury	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Albury	NSW Race Narrowcasts Open Narrowcast		99.3 FM	10 watts
Armidale	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Ballina	NSW Race Narrowcasts	LPON	88 FM	1 watt
Balranald	NSW Race Narrowcasts	Open Narrowcast	95.5 FM	25 watts
Balranald	NSW Race Narrowcasts	LPON	88 FM	1 watt
Baradine	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Barham	NSW Race Narrowcasts	LPON	88 FM	1 watt
Barraba	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Batemans Bay	NSW Race Narrowcasts	LPON	88 FM	1 watt
Bathurst	NSW Race Narrowcasts	Open Narrowcast	100.9 FM	10 kW
Bega	Suzette Elizabeth Munro	LPON	87.6FM	1 watt
Berrigan	Hello Radio Pty Ltd	LPON	87.6FM	1 watt
Bingara	Suzette Elizabeth Munro	LPON	87.6 FM	1 watt
Binnaway	Suzette Elizabeth Munro	LPON	87.6 FM	1 watt
Blayney	Suzette Elizabeth Munro	LPON	87.6 FM	1 watt
Boggabri	Suzette Elizabeth Munro	LPON	87.6 FM	1 watt
Bourke	NSW Race Narrowcasts	Open Narrowcast	96.1 FM	10 watt
Braidwood	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Brewarrina	Hello Radio Pty Ltd	LPON	88 FM	1 watt
Brewarrina	NSW Race Narrowcasts	Open Narrowcast	96.1 FM	10 watt
Broken Hill	<b>NSW Race Narrowcasts</b>	Open Narrowcast	100.5 FM	4 kW
Brookvale	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Byron Bay	<b>NSW Race Narrowcasts</b>	LPON	87.6 FM	1 watt
Canowindra	NSW Race Narrowcasts	LPON	87.6FM	1 watt
Casino	NSW Race Narrowcasts	LPON	87.6FM	1 watt
Cobar	Suzette Elizabeth Munro	LPON	88FM	1 watt
Cobar	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Cobar	NSW Race Narrowcasts	Open Narrowcast	104.5 FM	100 watt
Coffs Harbour	<b>NSW Race Narrowcasts</b>	LPON	88 FM	1 watt
Collarenebri	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Collarenebri	NSW Race Narrowcasts	Open Narrowcast	97.1 FM	25 watt
Condobolin	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Condobolin	NSW Race Narrowcasts	Open Narrowcast	92.1 FM	100 watt
Coolah	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Cooma	PM Conroy	LPON	88 FM	1 watt
Coonabarabran	<b>NSW Race Narrowcasts</b>	LPON	87.6 FM	1 watt
Coonamble	NSW Race Narrowcasts	LPON	87.6 FM	1 watt

Cootomundro	NSW Page Narrowagete	LPON	87.6 FM	1 wott
Cootamundra Corowa	NSW Race Narrowcasts NSW Race Narrowcasts	LPON	88FM	1 watt 1 watt
	NSW Race Narrowcasts		94.9 FM	1 wall
Corowa Crescent Head		Open Narrowcast LPON	87.6 FM	10 watt
	Hello Radio Pty Ltd	LPON		
Crookwell	Inforadio Australia Pty Ltd		87.6 FM	1 watt
Curlowia	NSW Race Narrowcasts	Open Narrowcast	92.5 FM	10 watt
Curlewis	Hello Radio Pty Ltd	LPON LPON	87.6 FM	1 watt
Deepwater	lan James Munro	_	87.6 FM	1 watt
Deniliquin	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Deniliquin	NSW Race Narrowcasts	LPON	88 FM	1 watt
Dorrigo	lan James Munro	LPON	88 FM	1 watt
Dubbo	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Dubbo	NSW Race Narrowcasts	Open Narrowcast	90.3 FM	100 watt
Dunedoo	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Eden	PM Conroy	LPON	98.1 FM	1 watt
Evans Head	NSW Race Narrowcasts	LPON	88 FM	1 watt
Finley	NSW Race Narrowcasts	LPON	88 FM	1 watt
Forbes	Suzette Elizabeth Munro	LPON	87.6 FM	1 watt
Forster	NSW Race Narrowcasts	LPON	93.5 FM	1 watt
Gilgandra	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Goulburn	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Grafton	NSW Race Narrowcasts	LPON	88 FM	1 watt
Grenfell	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Griffith	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Gulgong	Hello Radio Pty Ltd	LPON	88 FM	1 watt
Gundagai	Inforadio Australia Pty Ltd	LPON	87.6 FM	1 watt
Gunnedah	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Guyra	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Hillston	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Holbrook	NSW Race Narrowcasts	Open Narrowcast	99.3 FM	10 watt
Inverell	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Jerilderie	Hello Radio Pty Ltd	LPON	87.6 FM	1 watt
Jindabyne	Inforadio Australia Pty Ltd	LPON	87.6 FM	1 watt
Junee	Suzette Elizabeth Munro	LPON	97.1 FM	1 watt
Kempsey	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Kyogle	NSW Race Narrowcasts	LPON	88 FM	1 watt
Lake Cargelligo	Ian James Munro	LPON	87.6 FM	1 watt
Leeton	Ian James Munro	LPON	87.6 FM	1 watt
Lennox Head	Ian James Munro	LPON	87.6 FM	1 watt
Lightning Ridge	NSW Race Narrowcasts	Open Narrowcast	98.5 FM	25 watt
Lightning Ridge	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Lismore (Goonellebah)	Ian James Munro	LPON	87.6 FM	1 watt
Lithgow	NSW Race Narrowcasts	Open Narrowcast	89.7 FM	100 watt
Macksville	NSW Race Narrowcasts	LPON	88 FM	1 watt
Maclean	NSW Race Narrowcasts	LPON	88 FM	1 watt
Manilla	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Merimbula	New Age Communications	LPON	96.5 FM	1 watt
Moree	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Mudgee	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Mudgee	NSW Race Narrowcasts	Open Narrowcast	90.9 FM	1 kW
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Mullumbimby	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Mulwalla	NSW Race Narrowcasts	Open Narrowcast	92.5 FM	10 watt
Murrurundi	NSW Race Narrowcasts	LPON	88 FM	1 watt
Murwillumbah	NSW Race Narrowcasts	LPON	88 FM	1 watt
Muswellbrook	NSW Race Narrowcasts	LPON	94.5 FM	1 watt
Nambucca Heads	NSW Race Narrowcasts	LPON	88 FM	1 watt
Narooma	PM Conroy	LPON	98.1 FM	1 watt
Narrabri	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Narrandera	Suzette Elizabeth Munro	LPON	88 FM	1 watt
Narromine	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Newcastle	NSW Race Narrowcasts	Open Narrowcast	1341 AM	5 kW
Nyngan	Suzette Elizabeth Munro	LPON	99 FM	1 watt
Oberon	Ian James Munro	LPON	87.6 FM	1 watt
Orange	Ian James Munro	LPON	88 FM	1 watt
Orange	NSW Race Narrowcasts	Open Narrowcast	106.7 F	5 kW
Parkes	New Age Communications	LPON	87.6 FM	1 watt
Parkes	NSW Race Narrowcasts	Open Narrowcast	91.5 FM	10 kW
Parramatta	2KY Broadcasters	Experimental DAB	1.4837 GHz	400 w
Port Macquarie	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Queanbeyan	PM Conroy	LPON	87.6 FM	1 watt
Quirindi	NSW Race Narrowcasts	LPON	88 FM	1 watt
Rylstone	NSW Race Narrowcasts	LPON	88 FM	1 watt
Sawtell	NSW Race Narrowcasts	LPON	87.8 FM	1 watt
South West Rocks	NSW Race Narrowcasts	LPON	88 FM	1 watt
Sydney(Homebush)	2KY Broadcasters	Commercial	1017 AM	5 Kw
Tamworth	NSW Race Narrowcasts	LPON	87.6FM	1 watt
Taree	NSW Race Narrowcasts	LPON	87.6FM	1 watt
Tathra	lan James Munro	LPON	98.1 FM	1 watt
Temora	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Tenterfield	Suzette Elizabeth Munro	LPON	87.6 FM	1 watt
Tocumwal	NSW Race Narrowcasts	LPON	88 FM	1 watt
Tumbarumba	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Tumut	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Tweed Heads	NSW Race Narrowcasts	LPON	88 FM	1 watt
Ulladulla	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Uralla	lan James Munro	LPON	87.6 FM	1 watt
Urunga	NSW Race Narrowcasts	LPON	88 FM	1 watt
Wagga Wagga	NSW Race Narrowcasts	LPON	88 FM	1 watt
Walcha	NSW Race Narrowcasts	LPON	88 FM	1 watt
Walgett**	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Walgett**	NSW Race Narrowcasts	Open Narrowcast	99.5 FM	25 watt
Warren	Hello Radio Pty Ltd	LPON	88 FM	1 watt
Warren	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Wauchope	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Wee Waa	Inforadio Australia Pty Ltd	LPON	88 FM	1 watt
Wellington	Wellington Council	LPON	87.6 FM	1 watt
Wentworth	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Werris Creek	NSW Race Narrowcasts	LPON	88 FM	1 watt
West Wyalong	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Wilcannia	NSW Race Narrowcasts	LPON	88 FM	1 watt

Wilcannia	NSW Race Narrowcasts	Open Narrowcast	98.3 FM	25 watt
Wingham	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
Wollongong	NSW Race Narrowcasts	Open Narrowcast	1314 AM	5 kW
Woolgoolga	NSW Race Narrowcasts	LPON	88 FM	1 watt
Yamba	NSW Race Narrowcasts	LPON	88 FM	1 watt
Yass	New Age Communications	LPON	88 FM	1 watt
Young	NSW Race Narrowcasts	LPON	87.6 FM	1 watt
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NSW Planned		_	_	_
Location	Licence Holder	Licence Type	Frequency	Power
Glen Innes	NSW Race Narrowcasts	Open Narrowcast	107.5 FM	3 Kw
Inverell	NSW Race Narrowcasts	Open Narrowcast	92.7 FM	1 Kw
Moree	NSW Race Narrowcasts	Open Narrowcast	103.7 FM	1 Kw
Victoria Existing				
Location	Licence Holder	Licence Type	Frequency	Power
Melbourne	3UZ Pty Ltd	Commercial	927 AM	5Kw
Mildura	AMI Pty Ltd	Commercial	97.9 FM	10Kw
Bendigo	3UZ Pty Ltd	Open Narrowcast	945 AM	2Kw
Ballarat	Ballarat Sports Radio Pty Ltd	Commercial	1314 AM	5Kw
Swanhill	•			10Kw
	3UZ Pty Ltd	Open Narrowcast	106.9 FM	
Horsham	3UZ Pty Ltd	LPON	88 FM	1W
Traralgon	3UZ Pty Ltd	LPON	88 FM	1W
Shepparton	3UZ Pty Ltd	LPON	87.6 FM	1W
Wangaratta	Visitor Radio Network	LPON	87.6 FM	1W
Wangaratta	3UZ Pty Ltd	Open Narrowcast	99.3 FM	10W
Bairnsdale	Visitor Radio Network	LPON	87.6 FM	1W
Lakes Entrance	Visitor Radio Network	LPON	87.6 FM	1W
Victoria Planned				
Location	Licence Holder	Licence Type	Frequency	Power
Shepparton	3UZ Pty Ltd	Commercial	1260 AM	2Kw
Shepparton	302 Fty Ltd	Commercial	1200 AW	ZIXW
Queensland Existing				
Location	Licence Holder	Licence Type	Frequency	Power
Aramac	Aramac Shire Council	LPON	87.6 FM	1w
Airlie Beach	TAB Queensland	LPON	87.6 FM	1w
Atherton	Paradise Broadcast	LPON	87.6 FM	1w
Augathella	Margaret Greenway	LPON	88.0 FM	1w
Barcaldine	TAB Queensland	Open Narrowcast	103.3 FM	100w
Bedourie	Birdsville Shire Council	Open Narrowcast	101.3FM	10w
Biloela	Valley FM	LPON	90.1 FM	1w
Birdsville	Birdsville Shire Council	Open Narrowcast	101.3FM	10w
Blackall	TAB Queensland	Open Narrowcast	98.3FM	25w
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Blackwater	TAB Queensland	Open Narrowcast	97.5 FM	500w
Brisbane	Broadcasting Station 4IP P/L	Commercial	1008 AM	5Kw
Bundaberg	TAB Queensland	Open Narrowcast	95.5FM	3Kw
Cairns City	Paradise Broadcast	LPON	87.6 FM	1w
Charleville	TAB Queensland	Open Narrowcast	103.3FM	25w
Charters Towers	TAB Queensland	Open Narrowcast	94.3 FM	25w

Clermont	TAB Queensland	Open Narrowcast	106.1 FM	50w
Cloncurry	TAB Queensland	Open Narrowcast	103.7 FM	100w
Collinsville	TAB Queensland	Open Narrowcast	103.7 FM	25w
Cooktown	TAB Queensland	Open Narrowcast	103.7 FM	100w
Cunnamulla	Paroo Shire Council	LPON	87.6FM	1w
Edge Hill	Paradise Broadcast	LPON	87.6 FM	1w
Edmonton	Paradise Broadcast	LPON	87.6 FM	1w
Emerald	TAB Queensland	Open Narrowcast	95.5 FM	2Kw
Emu Park	Valley FM	LPON	88.0 FM	1w
Gladstone	TAB Queensland	Open Narrowcast	94.3 FM	100w
Goondiwindi	TAB Queensland	Open Narrowcast	90.3 FM	100w
Gordonvale	Paradise Broadcast	LPON	87.6 FM	1w
Hervey Bay	TAB Queensland	LPON	88.0 FM	1w
Hughenden	Flinders Shire Council	LPON	87.6FM	1w
Innisfail	TAB Queensland	Open Narrowcast	97.3FM	20w
Kewarra Beach	Paradise Broadcast	LPON	87.6 FM	1w
Longreach	TAB Queensland	Open Narrowcast	103.7FM	25w
Mackay	TAB Queensland	LPON	88.0 FM	1w
Mareeba	Paradise Broadcast	LPON	87.6 FM	1w
Maryborough	TAB Queensland	LPON	88.0 FM	1w
Moranbah	TAB Queensland	LPON	88.0 FM	1w
Mt. Isa	TAB Queensland	Open Narrowcast	103.3 FM	100w
Normanton	TAB Queensland	Open Narrowcast	103.3 FM	100w
Palm Cove	Paradise Broadcast	LPON	87.6 FM	1w
Proserpine	TAB Queensland	LPON	87.6 FM	1w
Quilpie	Quilpie Shire Council	LPON	88.0 FM	1w
Redlynch	Paradise Broadcast	LPON	87.6 FM	1w
Richmond	Richmond Shire Council	LPON	87.6 FM	1w
Rockhampton	TAB Queensland	LPON	99.9FM	1Kw
Roma	TAB Queensland	Open Narrowcast	94.3FM	100w
Smithfield	Paradise Broadcast	LPON	87.6 FM	1w
St George	TAB Queensland	Open Narrowcast	103.7 FM	100w
Tambo	TAB Queensland	LPON	88.0FM	1w
Thursday Island	TAB Queensland	Open Narrowcast	103.7 FM	100w
Toowoomba	TAB Queensland	LPON	99.1 FM	1w
Townsville	TAB Queensland	Open Narrowcast	891 AM	5Kw
Trinity Beach	Paradise Broadcast	LPON	87.6 FM	1w
Tully	TAB Queensland	Open Narrowcast	93.9FM	20w
Weipa	TAB Queensland	Open Narrowcast	103.3 FM	100w
Winton	TAB Queensland	Open Narrowcast	98.3FM	25w
Woree	Paradise Broadcast	LPON	87.6 FM	1w
Yeppoon	TAB Queensland	LPON	87.6 FM	1w

#### **Queensland Planned**

Location	Licence Holder	Licence Type	Frequency	Power
Cairns	TAB Queensland	Open Narrowcast	89.1 FM	10 Kw
Kingaroy	TAB Queensland	Open Narrowcast	93.1 FM	20 w
Dalby	TAB Queensland	Open Narrowcast	94.3 FM	20 w
Toowoomba	TAB Queensland	Open Narrowcast	91.5 FM	1 Kw
Warwick	TAB Queensland	Open Narrowcast	95.1 FM	20 w

Stanthorpe	TAB Queensland	Open Narrowcast	93.1 FM	20 w
South Australia Existing				
Location	Licence Holder	Licence Type	Frequency	Power
Adelaide	SA TAB	Open Narrowcast	1539 AM	5Kw
Port Augusta	SA TAB	LPON	87.6 FM	1W
Whyalla	SA TAB	LPON	88 FM	1W
Port Pirie	SA TAB	LPON	88 FM	1W
Port Lincoln	SA TAB	LPON	88 FM	1W
Narcoorte	SA TAB	LPON	88FM	1W
MT Gambier	SA TAB	LPON	88FM	1W
Millicent	SA TAB	LPON	88 FM	1W
Penola	SA TAB	LPON	88 FM	1W
Victor Harbor	SA TAB	LPON	88 FM	1W
Riverland	SA TAB	Open Narrowcast	95.5 FM	500W
Roxby Downs	SA TAB	Open Narrowcast	95.5 FM	500W
•		'		
South Australia				
Planned				
Location	Licence Holder	Licence Type	Frequency	Power
Ceduna	SA TAB	Open Narrowcast	102.1 FM	250W
Woomera	SA TAB	Open Narrowcast	106.5 FM	50W
Coober Pedy	SA TAB	Open Narrowcast	98.1 FM	25W
Western Australia				
Existing	Liaanaa Haldan	Licence Tomo	F=====================================	Davis
Existing Location	Licence Holder	Licence Type	Frequency	Power
Existing Location Albany	WA TAB	Open Narrowcast	104.9 FM	100W
Existing Location Albany Broome	WA TAB WA TAB	Open Narrowcast Open Narrowcast	104.9 FM 104.5 FM	100W 250W
Existing Location  Albany Broome Busselton	WA TAB WA TAB WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast	104.9 FM 104.5 FM 1404 AM	100W 250W 4KW
Existing Location  Albany Broome Busselton Carnarvon	WA TAB WA TAB WA TAB WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast	104.9 FM 104.5 FM 1404 AM 96.5 FM	100W 250W 4KW 250W
Existing Location  Albany Broome Busselton Carnarvon Dampier	WA TAB WA TAB WA TAB WA TAB WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM	100W 250W 4KW 250W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 88 FM	100W 250W 4KW 250W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 88 FM 87.6 FM	100W 250W 4KW 250W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 88 FM 87.6 FM 88.6 FM	100W 250W 4KW 250W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 88 FM 87.6 FM 88.6 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 88 FM 87.6 FM 88.6 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 88 FM 1449 AM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 88 FM 1449 AM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora Narrogin	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 1449 AM 88 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora Narrogin Newman	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast Upen Narrowcast Upen Narrowcast Upen Upen Upen Upen Upen Upen Upen Upen	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 1449 AM 88 FM 88 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora Narrogin Newman Northam	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast Upen Narrowcast Upen Narrowcast Upen Narrowcast Upen Upen Upen Narrowcast Upen Upen Upen Narrowcast Upen Upen Narrowcast Upen Upen Upen Upen Upen Upen Upen Upen	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 1449 AM 88 FM 88 FM 88 FM 88 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora Narrogin Newman Northam Perth	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 1449 AM 88 FM 88 FM 88 FM 88 FM 88 FM 88 FM 88 FM 88 FM 88 FM 88 FM	100W 250W 4KW 250W 1W 2KW 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora Narrogin Newman Northam Perth Port Hedland	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 1449 AM 88 FM 88 FM 1449 AM 88 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora Narrogin Newman Northam Perth Port Hedland Tom Price	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast Upen Narrowcast Upen Narrowcast Upen Upen Upen Upen Upen Upen Upen Upen	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 1449 AM 88 FM 88 FM 1449 AM 88 FM 1206 AM 87.6 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W
Existing Location  Albany Broome Busselton Carnarvon Dampier Derby Geraldton Geraldton Kalgoorlie/Boulder Karratha Katanning Mandurah Moora Narrogin Newman Northam Perth Port Hedland	WA TAB	Open Narrowcast Open Narrowcast Open Narrowcast Open Narrowcast LPON LPON LPON LPON LPON LPON LPON LPON	104.9 FM 104.5 FM 1404 AM 96.5 FM 88 FM 87.6 FM 88.6 FM 88 FM 88 FM 1449 AM 88 FM 88 FM 1449 AM 88 FM 88 FM	100W 250W 4KW 250W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W 1W

Planned	Liaanaa Haldan	Linean Trump	<b></b>	Dannan
Location	Licence Holder	Licence Type	Frequency	Power
Broome	WA TAB	LPON	87.6 FM	1W
Bunbury	WA TAB	Open Narrowcast	1017 AM	1KW
Carnarvon	WA TAB	LPON	87.6 FM	1W
Esperance	WA TAB	Open Narrowcast	89.5 FM	5KW
Exmouth	WA TAB	Open Narrowcast	95.7 FM	50W
Geraldton	WA TAB	Open Narrowcast	1008 AM	2KW
Kalbarri	WA TAB	Open Narrowcast	105.3 FM	20W
Kalgoorlie	WA TAB	Open Narrowcast	1431 AM	2KW
Karratha	WA TAB	Open Narrowcast	101.7 FM	1KW
Kununurra	WA TAB	Open Narrowcast	105.7 FM	200W
Laverton	WA TAB	Open Narrowcast	104.7 FM	50W
Leinster	WA TAB	Open Narrowcast	99.7 FM	100W
Meekatharra	WA TAB	Open Narrowcast	104.1 FM	50W
Merredin	WA TAB	Open Narrowcast	95.9 FM	50W
Mount Magnet	WA TAB	Open Narrowcast	104.1 FM	50W
Northam	WA TAB	Open Narrowcast	1323 AM	2-5KW
Pt Hedland (Wedgefield)	WA TAB	Open Narrowcast	92.5 FM	2KW
Southern Cross	WA TAB	Open Narrowcast	88.7 FM	50W
Wagin	WA TAB	Open Narrowcast	1422 AM	2KW
Wyndham	WA TAB	Open Narrowcast	100.5 FM	1KW
Tasmania Existing				
Location	Licence Holder	Licence Type	Frequency	Power
South Tasmania	TASRADIO	Open Narrowcast	1080 AM	5Kw
Northern Tasmania	TASRADIO	Commercial	1008 AM	5Kw
Queenstown	TASRADIO	LPON	87.6 FM	1W
Strahan	TASRADIO	LPON	87.6 FM	1W
Zeehan	TASRADIO	LPON	87.6 FM	1W
Rosebery	TASRADIO	LPON	87.6 FM	1W
Tullah	TASRADIO	LPON	87.6 FM	1W
Smithton	TASRADIO	LPON	87.6 FM	1W
Tasmania Planned				
Location	Licence Holder	Licence Type	Frequency	Power
Scottsdale	TASRADIO	LPON	87.6 FM	1W
St Helens	TASRADIO	LPON	87.6 FM	1W
Bicheno	TASRADIO	LPON	87.6 FM	1W
St Marys	TASRADIO	LPON	87.6 FM	1W
- · · · · · · · · · · · · · · · · · · ·	TASRADIO	LPON	87.6 FM	1W
Devonport		-· ···		
•	TASRADIO	LPON	87.6 FM	1W
Penguin	TASRADIO TASRADIO	LPON I PON	87.6 FM 87.6 FM	1W 1W
Penguin Ulverstone	TASRADIO	LPON	87.6 FM	1W
Devonport Penguin Ulverstone Port Sorrell Sheffield				

LPON

LPON

Burnie

Wynyard

TASRADIO

TASRADIO

1W

1W

87.6 FM

87.6 FM

Northern Territory					
Existing					
Location	Licence Holder	Licence Type	Frequency	Power	
Darwin	NT TAB	Open Narrowcast	1242 AM	10KW	
Alyangula	NT TAB	Open Narrowcast	103.7 FM	100W	
Nhulunby	NT TAB	Open Narrowcast	103.7 FM	100W	
Jabiru	NT TAB	Open Narrowcast	103.7 FM	25W	
Katherine	NT TAB	Open Narrowcast	103.7 FM	1KW	
Tennant Creek	NT TAB	Open Narrowcast	103.7 FM	250W	
Pine Creek	NT TAB	Open Narrowcast	103.7 FM	25W	
Yulara	NT TAB	Open Narrowcast	97.3 FM	400W	
Alice Springs	NT TAB	Open Narrowcast	95.9 FM	1KW	
Australian Capital Ter	ritory Planned				
Location	Licence Holder	Licence Type	Frequency	Power	
Canberra - Black Mtn.	C.D.R.S.B. Ltd.	Community	103.9 FM	10 Kw	
Australian Capital Territory Existing					
Location	Licence Holder	Licence Type	Frequency	Power	
Canberra - Tuggeranong	C.D.R.S.B. Ltd.	Community	99.9 FM	100 w	

## Summary

# Summary Existing

	Commercial	Open Narrowcasting	LPON	Community	Experimental	Total
NSW	1	23	120	0	1	145
VIC	3	3	6	0	0	12
QLD	1	26	30	0	0	57
SA	0	3	9	0	0	12
WA	0	7	14	0	0	21
TAS	1	1	6	0	0	8
NT	0	9	0	0	0	9
ACT	0	0	0	1	0	1
	6	72	185	1	1	265

# Summary Planned

	Commercial	Open Narrowcasting	LPON	Community	Experimental	Total
NSW	0	3	0	0	0	3
VIC	1	0	0	0	0	1
QLD	0	6	0	0	0	6
SA	0	3	0	0	0	3
WA	0	18	2	0	0	20
TAS	0	0	11	0	0	11
NT	0	0	0	0	0	0
ACT	0	0	0	1	0	1
	1	30	13	1	0	45

## ADDENDUM "B"

# Australian Broadcasting Authority database of Open Narrowcast licences as at 11<sup>th</sup> March 1999

Tatley Pty Ltd	5	4%
NSW Race Narrowcasts Pty Ltd	25	19%
University of New England	1	1%
Robrad Pty Ltd	7	5%
Broken Hill Church of Christ Inc	1	1%
Northern Territory Racing Commission	9	7%
Top End Sounds Pty Ltd	6	5%
Phillip Charles Ward	1	1%
Remco Leon De Groot	1	1%
Rillwood Pty Ltd	1	1%
Lower Burdekin Development Council Inc	1	1%
TAB Queensland	26	20%
Seabrae Pty Ltd	1	1%
John Robertshaw	1	1%
Bundaberg Broadcasters Pty Ltd	3	2%
Dale Parker Anderson	2	2%
Neal James Guilmartin	1	1%
Glenn Charles Smith	1	1%
South Australia Totalizator Agency Board	6	5%
Tasradio Pty Ld	1	1%
3UZ Pty Ltd	5	4%
Totalizator Agency Board of Western Australia	23	18%
Goolarri Media Enterprises Pty Ltd	1	1%
	<u>129</u>	<u>100%</u>
Racing Radio Licences	<u>95</u>	73.64%