

20 June 2014



ABC
Australian
Broadcasting
Corporation

The Project Manager
Spectrum Review
Department of Communications
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Spectrum Review Issues Paper

Dear Madam/Sir,

The ABC welcomes the opportunity to comment on the proposed terms of reference for the Government's review of Australia's spectrum management framework.

As the national broadcaster, the ABC uses spectrum across a broad range of frequencies and has a considerable interest in the spectrum framework. The Corporation uses the broadcasting services bands (BSBs) to deliver radio and television services. It also uses non-BSB spectrum for a range of purposes, including supporting content acquisition, satellite up- and down-links and direct-to-home services, communications and data transfer, international short-wave broadcasting and domestic short-wave broadcasting to remote regions of Australia.

The ABC believes that the proposed terms of reference provide adequate scope for a wide-ranging examination of the spectrum framework. However, it is concerned that the terms of reference do not acknowledge that the BSBs are administered separately from the rest of the radiofrequency spectrum.

Broadcast spectrum planning in Australia is based on a series of policy principles that seek to maximise public benefit by ensuring quality, diversity and, as far as possible, universal availability of broadcasting services. To this end, the BSBs are administered separately from the rest of the radiofrequency spectrum, as set out in the *Broadcasting Services Act 1992*, and are subject to detailed planning processes that provide stringent, pre-emptive protection from interference. The ABC is strongly of the view that, to provide the best possible services to Australian audiences, broadcasting spectrum should continue to be planned on this basis within any redeveloped spectrum framework.

As the review is primarily focused on the operation of the *Radiocommunications Act 1992*, the Corporation believes that broadcasting spectrum, which is allocated and planned under the *Broadcasting Services Act 1992*, should be explicitly identified as outside of its terms of reference.

Should you have any further questions about these issues, please contact Dr David Sutton, Head of Strategic Policy. He may be contacted on (02) 8333 2429, by mobile phone on 0409 241 846 or by email at sutton.david@abc.net.au.

Yours faithfully,

A handwritten signature in black ink that reads "Michael Millett". The signature is written in a cursive, slightly slanted style.

Michael Millett
Director Corporate Affairs