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Radio Spectrum Management

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Rhema Media Submission on RSM Consultation Document: GURL for Short Range Devices: Usage in Frequencies below 30 MHz

Introduction

As a licence holder for 28 AM Frequencies around NZ, Rhema Media has a large commitment to the ongoing use of AM receivers around the country to receive our programming. AM broadcast in NZ is still a valuable option given the topography of the country and the widely spread population across the land.

As you have noted within the consultation document, there are already a number of devices or products that have encroached upon AM broadcast band compromising the ability of listeners to receive a clear interference free reception of our programmes.

Any suggestion that it is OK to accept a new source of interference because other interference already exists makes no sense nor does the assumption that an owner/operator or an induction loop would most likely be interfering with their own equipment.

The general public have no idea how these systems work and they expect and rely on the authorities in charge to manage the design, services and devices to coexist without causing interference to their own equipment or their neighbours.

The conditions of our licence agreements state that the frequency will be protected for broadcast use, we have and continue to comply with the limits of these agreements, we expect RSM to also comply with their responsibility to protect them.

Responses to Questions in Discussion Document

2.1 WPT Systems

Q1. *Should other international standards also be considered for equipment conformance in relation to WPT systems?*

Rhema Media have no comment on this question and expect that NZ would, where possible, use the appropriate international standard.

2.2 Inductive Loop Systems

Q2. *Should other international standards also be considered for equipment conformance in relation to inductive loop systems below 30 MHz?*

Rhema Media have not investigated what standards are developed for inductive loops so cannot comment.

2.3 Scope

Q3. *Do you agree that GURL SRD is the most appropriate licensing instrument to permit WPT and inductive loop systems in the frequencies below 30 MHz?*

Only if the conditions of the licence are such that the adjacent frequencies maintain their protection from interference from the SRD's and that there is a commitment to investigate any complaint of interference and enforce compliance of the licence conditions.

Q4. *Do you agree that the proposed actions would sufficiently cover the new usages for WPT and inductive loop systems?*

No, we do not believe the proposed actions provide enough protection to interference of broadcast licenced frequencies.

3.0 Issues with permitting inductive loop systems in 0.1485-30 MHz

Q5. *Are there any other usages in the frequency range 0.1485-30 MHz that have been omitted from the scope of this technical consultation?*

We have not investigated other uses.

4.1 Analysis – Coexistence study between inductive loop systems and radio licences in frequencies below 30 MHz

Q6. Do you agree with the use recommendation ITU-R SM.2028 for assessing technical compatibility between inductive loop systems and radio licences in frequencies below 30 MHz?

Yes.

4.2 Results

Q7. Do you agree with the results of technical compatibility between inductive loop systems and radio licences in frequencies below 30 MHz? If not, what other assessments should the Ministry consider?

No, it is highly likely that Inductive Chargers will regularly be used within a 10M proximity of receivers and that interference with the broadcast signal will occur.

This is particularly true of the mid to high density housing that we are now seeing across our cities.

As described in the consultation document, Inductive Loop Chargers are not compatible with AM broadcast radio licences.

5.2 Results of Analysis – Coexistence study: Inductive loop systems and spectrum licences in AM band 0.521-1.612 MHz

Q8. Do you agree with the results of technical compatibility between inductive loop systems and spectrum licences in the AM band 0.521-1.612 MHz? If not, what other assessments should the Ministry consider?

No, we do not believe there is any argument to change or ignore the agreed protection limits on existing broadcast licences. We would expect RSM to carry out compliance action in the event of interference to a right holder.

If changes need to be made to allow for new technologies, then appropriate alternatives to the existing broadcast licences needs to be negotiated with existing licence holders before the new technologies can be approved.

6.0 Proposals

Q9. Do you agree with the proposed changes to GURL SRD and Radio Standards Notice?

No, the consultation document already acknowledges that AM broadcast is susceptible to “urban” interference. To simply add to that because it already exists would be failure to manage the spectrum.

Q10. Do you have any other comments?

Thank you for the opportunity to comment on this proposal, we acknowledge that the advent of new technologies and the expectation of the public to be able to access these technologies creates competing interests. We appreciate the work RSM does in evaluating the options available.

As a Broadcaster in NZ, we look forward to working with RSM to agree suitable solution that satisfies all requirements moving forward.

Yours sincerely



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