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

Introduction

The RBA submit that AM is still an important listening platform for NZ radio listeners. We started monitoring the AM and FM listening splits at the start of 2017 so the industry and interested parties could have a better view of what we had only estimated in the past. The latest GfK Radio Survey release on 19 September 2018 shows that of all radio listening done in NZ, 620,000 New Zealanders listen on AM which is 15% of the population. The reason for AM's continued presence in New Zealand is due largely to the following factors:

- Larger geographic coverage on AM frequencies in “hilly” regions like North Auckland, Northland and the Coromandel.
- The number of radio stations still available on AM with many brands like Radio Sport and Magic only available in some areas.
- The high penetration of Japanese imported cars that do not have NZ FM band radios in their cars therefore use AM instead.

With many of the Civil Defence MOU partner stations like Newstalk ZB and RNZ National having large AM listenership, we take the ability to provide uninterrupted coverage to these audiences seriously, especially in regions like the Coromandel that are often affected by flooding and other emergency events. Also, with AM having such extended coverage, it is possible for AM to keep going outside of a geographically damaged area where all other infrastructure could be disabled.

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?*

The RBA is comfortable with the existing standards in place for measuring equipment conformance.

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?*

We would be interested in understanding just what alternatives are available for conformance of Inductive Loop systems operating below 30 MHz.

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?*

We oppose the use of the GURL SRD as a licensing instrument for WPT and Inductive Loop systems.

In fact, the RBA opposes the very existence of the GURL operating in or adjacent to frequency ranges where valuable assets (AM and FM broadcast frequencies) operate.

We consider the principle where the GURL allows use of spectrum without any public record or personal responsibility objectionable given the regulations and license fees paid by broadcasters.

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.

We consider an alternative approach would be to reduce the power output of the Inductive Loop Chargers from current permitted levels.

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 are unaware of any omissions, but as with Q3 because operation in the GURL without adequate record of use is permitted, how can we be sure all usage is captured.

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?

We have no problem with the use of ITU-R SM.208 being used as an assessment tool.

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?

In a perfect world then yes, the results of the Technical Compatibility are very valid.

However normal household use, it would be expected most Inductive Chargers would normally be within a 10M proximity of receivers.

Consideration should also be given to heavily populated inner-city apartment dwellings where interference from adjacent properties is a distinct probability.

Given these considerations and the Discussion Document's calculations, we submit that the use of Inductive Loop Chargers is 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?

Yes, we agree with the results of the compatibility study and note the following.

The RAM's calculations provided in the document show the MPIS on broadcast AM licences will be exceeded by 0.5dB if devices are within a 10M proximity. We feel this should not be tolerated.

Further, if the RSM believes it is appropriate to permit interference to AM licences, then acknowledgement should be provided when licences are sold. This should mention interference to AM signals can only occur with the agreement of the licence owners or if not, compensation by way of acknowledgement of interference should be provided.

The RBA would expect RSM to carry out compliance action in the event of interference to a right holder. In our view this would be extensive if the proposal is implemented.

6.0 Proposals

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

The RBA struggle to agree with any use of the GURL that cause interference to broadcast licences. The document already states that AM broadcast is susceptible to "urban"

interference. It would seem the “horse has already bolted” in that many modern devices already operating without record harm the quality of valuable AM licences.

This supports the RBA view that the GURL is not a useful mechanism in preserving the integrity of RADIO broadcast licences.

We believe discussion is warranted in providing designated spectrum for Short Range Devices – not adjacent or including the AM / FM broadcast spectrum ranges.

Q10. Do you have any other comments?

The RBA want to acknowledge that the RSM has put significant work into the Discussion Document & appreciates the opportunity to provide comment.

There is mention of adoption of more relaxed MPIS for AM licences by other jurisdictions. If this is the Ministry’s intention, then that should have been signalled before the Government accepted substantial monies for licences in either 1989 or 2011.

Further, we believe the NZ situation is different in that NZ AM broadcasts enjoy the use of wider modulation bandwidth than other countries therefore will be susceptible to greater impact from increased noise levels.

As always, the RBA is open to working with RSM to agree suitable compromises that satisfies all requirements moving forward.

Yours sincerely

A handwritten signature in cursive script that reads "Jana Rangooni".

Jana Rangooni

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