

PULZAR FM

dance music radio

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VHF-FM BROADCASTING: FREQUENCY AVAILABILITY & ALLOCATION

SUBMISSION TO RSM

This set of submissions addresses proposals in the Ministry of Economic Development, Radio Spectrum Management Discussion Paper, "VHF-FM Broadcasting: Frequency Availability & Allocation, September 2005".

Introduction

Pulzar FM has been operating in Christchurch since 19th October 1999 broadcasting initially on 88.4 FM (now on 88.7 FM). We provide a lively up-tempo format consisting of various genres of dance music, and are currently fully staffed by volunteers. Founded by two young kiwi entrepreneurs, Pulzar FM has been well received by those that can hear it, and many people consider it a world leader in dance radio. Since its inception the directors have dreamed of obtaining wider coverage for the station. We have approached the Ministry of Economic Development, Radio Spectrum Management and the Minister of Broadcasting several times to enquire about a higher power licence to try and prove our format is commercially viable. On every occasion we have received little more than a polite letter as the current broadcasting environment has been locked down by government policy, leaving no room for the allocation of even a short term frequency licence. Considering the last high power frequency licensed in Christchurch was in 1991, this development is long overdue. We see the current discussion regarding future broadcasting use as a positive step for New Zealand's broadcasting industry, and submit the following for consideration.

Proposal A. Adopting a policy of permitting co-sited transmitters with a frequency separation of 0.4 MHz, providing that the licensed EIRP of such transmitters are within 10db of each other.

Pulzar FM would like to support moving to a 400 kHz carrier spacing, and suggest that a review of all VHF-FM broadcasting be completed and all spectrum be re-engineered for this spacing. Any sub carrier services should require a holder to purchase at market value the additional FM spectrum to use these services.

Proposal B. The proposed criteria for use of synchronous systems and in particular on the competitive aspects of allocating licences for synchronous use without a contestable allocation policy.

Pulzar FM supports the use of synchronous systems, where terrain or other environmental situation makes reaching the full theoretical listening audience in the area impossible.

Proposal C. The provision of infill coverage through licences separated by 400kHz from the main coverage service.

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Proposal D. The proposal to plan and implement VHF-FM broadcasting services between 87.5 MHz and 88 MHz. What time frame should be used?

Pulzar FM supports extending the lower edge of the FM band to 87.5 and would suggest that a spacing of 200 kHz be utilised by all LPFM users to reduce interference between broadcasters. A 12 month transition period should be required in areas where these bands are still in use, but allow immediate adoption in any areas where 87.5 to 88.0 are unused.

Proposal E. The proposal to allow a greater power for “low power” FM broadcasters under the general licence in the 88.0 MHz to 88.4MHz range. Is an eirp limit of 5 watts suitable? Should the method of measurement be changed to specify, say, 5 watts at the transmitter output and allow any antenna to be used?

Pulzar FM supports the suggestion that 88.0 to 88.4 be allowed to increase output power to 5W, but would suggest that a licensing scheme be implemented to control this, with a \$500-\$1000 P.A license fee required to make use of these frequencies, guaranteed coverage inside a 25km area, 200Khz spacing requirement and limit of 1 frequency allocation per company, trust or individual in any area where spectrum was in demand. Further we would suggest that a similar exercise in the upper band be investigated. 5W from the transmitter should be an acceptable measurement of broadcast power, but we do feel the use of high gain antennas should be limited to less than 4db.

Proposal F. The proposal to reserve a further set of licences (in addition to the present reservations) for a non-commercial or “non for profit” network. What programming purposes would be best broadcast on such a network (or equivalent individual area licences)? Who should manage such a service, how would it be funded and when could or should it be implemented.

Pulzar FM does not support the establishment of a non-profit frequency allocation, as the functions it would serve should be handled by existing community broadcasting organisations, and by national radio.

Proposal G. What advantages or disadvantages would occur from new entrants in local broadcasting markets? Would an auction allocation, with limitations on existing licence holders participating, be a satisfactory allocation mechanism?

Would any other mechanism be preferred? Should restrictions on use and/or transferability be established for any such licences?

Pulzar FM supports any suggestion that brings diversity to the NZ radio market. The radio industry has been controlled by a duopoly for too long, denying other broadcasters the opportunity to bring any new listening experiences to market. This situation has led to stagnation in listening experiences and a broad homogenised effect in what is being broadcast. The current environment has severely limited radio access for new emerging subcultures, which have had to utilise the extremely limited coverage of LPFM to reach their potential audience. An auction with limitations on any commercial frequency holder in that area would be an acceptable mechanism, however there should also be a requirement that the frequency be utilised within 12 months of completion of the auction and that ownership of the frequency to not be allowed to transfer for at least 24 months, and not ever be allowed to transfer to a broadcaster holding more than 1 or 2 frequencies in that geographical area. There should however also be limited bidding on frequencies in a geographical area, we would suggest that not more than 2 successful bids be accepted in any area.

Proposal H. The option of: reservation and later allocation of licences for a national not for profit network (or equivalent); for an allocation of two licences for local area broadcasting restricted to new entrants; and for allocation of two licences for general commercial use in each area. Is the balance between national reservation, local broadcasting and full commercial broadcasting appropriate?

Pulzar FM consider that allocating frequencies for non-profit purposes is not in the best interests of most new Zealanders, and consider that proposal G covers the protected allocations for new broadcasters and commercial broadcasting, and these should be protected from the predatory nature of the current foreign owned broadcasting duopoly. Local broadcasting licenses if allocated for should be limited to 1 frequency per individual/company/trust for the country, at least in areas where there is high demand for radio spectrum, to eliminate the possibility of commercial organisations taking advantage of a loophole to gain access to the entire country.

Submitted on behalf of the Pulzar Broadcasting Company Ltd.

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