

DMG RADIO (AUSTRALIA) PTY LTD

**SUBMISSION TO THE SENATE ECITA
LEGISLATION COMMITTEE**

ON THE

**BROADCASTING SERVICES AMENDMENT
(MEDIA OWNERSHIP) BILL 2002**

12 APRIL 2002

1 Introduction

- 1.1 This submission is made by DMG Radio (Australia) Pty Ltd (“**DMG**”). DMG is a wholly owned subsidiary of DMG Radio Investments Pty Ltd which is, in turn, owned 75% by Daily Mail & General Trust plc (“**DMGT**”) and 25% by GWR Group plc (“**GWR**”).
- 1.2 DMGT is a global media group with newspaper, radio, publishing, exhibition, teletext and other media businesses in the United Kingdom, Europe, United States, Canada, Australia, New Zealand and Asia. DMGT is also a substantial shareholder in GWR.
- 1.3 GWR is the largest operator of commercial radio in the United Kingdom. It also has interests in commercial radio in Europe, Australia and South Africa.
- 1.4 DMG has been a major participant in commercial radio in Australia since 1996 when it acquired the beginnings of its regional radio network as well as 5AA in Adelaide for an aggregate amount in excess of \$40 million. DMG since then has expanded its regional radio network with a further investment of more than \$120 million and has followed that up with \$317 million for new commercial licences in capital cities.
- 1.5 DMG successfully bid at auction for licences in Sydney and Melbourne, and in Brisbane and Perth in joint venture with Australian Radio Network (“**ARN**”). It has so far established successful commercial services pursuant to those licences in Sydney, Melbourne and Brisbane which have had a major impact upon the diversity of services and the level of competition in those markets. Its service in Perth is scheduled to commence towards the end of this year or early in 2003.
- 1.6 DMG has a long term commitment to commercial radio in Australia. It has already invested in the market close to \$500 million. A list of all its stations is included in the appendix to this submission. It has made (and will continue to make) a significant contribution to the diversity of services and the level of competition in the commercial radio industry in Australia.
- 1.7 This submission addresses the reforms contained in the *Broadcasting Services Amendment (Media Ownership) Bill 2002* (“**Bill**”) insofar as it purports to alter the current ownership and control structure of the commercial radio industry.

2 Executive Summary

- 2.1 DMG submits that the ownership and control regime (including the cross-media rules) in the *Broadcasting Services Act 1992* (“**BSA**”), insofar as it applies to commercial radio, must be retained in its current form at least until completion of the licence planning and allocation process currently being undertaken by the Australian Broadcasting Authority (“**ABA**”).
- 2.2 Upon completion of the ABA’s licence planning and allocation exercise, it may be appropriate to consider reforms to the ownership and control structure of the commercial radio industry (whether after or as part of an overall review of the ownership and control structure of the media industry generally).

- 2.3 Completion of the planning and allocation exercise will occur sometime during 2004 (ie, in another 18 to 24 months). There should be no changes to the ownership and control structure of the commercial radio industry before then.
- 2.4 DMG submits that if the cross-media rules in relation to the media industry generally are relaxed before completion of the planning and allocation exercise, it must be on the basis that those rules are not relaxed insofar as they apply to the commercial radio industry.
- 2.5 Moreover, at the very least, if that submission is rejected, any form of relaxation of the cross-media rules now, even if it applies to the commercial radio industry, must be on the basis that owners of newspapers and commercial television in any licence areas are not permitted to participate in the remaining radio licence auctions in the same licence areas.
- 2.6 If the ownership and control structure of the commercial radio industry is changed before completion of the planning and allocation exercise it will give rise to significant unfairness both to broadcasters who have acquired new licences under the BSA's price-based allocation system and also to those who intend to bid at the remaining auctions. This is because the current ownership and control regime (including the cross-media rules) is a fundamental component of the package of reforms enacted by the BSA in 1992 upon which DMG and others have relied when bidding for new licences at the auctions already concluded. Given that the licence planning and allocation exercise was to be completed by 1996, it was entirely reasonable to rely upon the continuation of the current ownership regime until completion of that process.
- 2.7 DMG quite simply would never have invested \$317 million at capital cities licence auctions and more than \$160 million to build its regional radio network through both licence auctions and other acquisitions, if it had contemplated that the ownership and control regime was subject to change before the planning and allocation process was completed.
- 2.8 To remove the cross-media rules from the commercial radio industry before completion of the planning and allocation process would be to override the principles of regulatory and procedural fairness, and would introduce an unprecedented level of political risk into the ownership of media assets in Australia.
- 2.9 Moreover, there is a real issue as to whether the Bill, if implemented now, will achieve its stated objectives of improving competition and promoting the objects of the BSA. In fact, a change to the ownership and control structure of the industry at this stage of its development would reduce the likelihood that a third national network of at least two FM commercial radio licences in each of Sydney and Melbourne will be established and would therefore jeopardise the introduction of effective competition to the incumbent dominant networks.
- 2.10 The dominant metropolitan FM networks are Austereo and ARN. Austereo owns two FM commercial licences in each of Sydney, Melbourne, Adelaide, Brisbane and Perth. ARN owns two FM licences in each of Sydney and Melbourne. It also has interests in two licences in Adelaide and Brisbane and one licence in Perth. With the capabilities of two licences in each of the major metropolitan cities, Austereo and ARN are able to generate

significant economies and efficiencies (both financially and in relation to programming) which are not available to the owner of only one licence in those markets. Although DMG's entry into the Sydney and Melbourne markets with the establishment of its Nova stations has increased diversity and competition, the full extent of that additional competition will not be realised if there is a significant change to the ownership and control structure of the industry in a manner which would introduce new and previously prohibited competition into the auctions for the vital additional FM licences in Sydney, Melbourne, Brisbane and Adelaide.

- 2.11 It also follows that DMG would be opposed to any proposal to relax the cross media rules insofar as they relate to the commercial radio industry but to leave those cross media rules in tact insofar as they relate to newspapers and commercial television. Although that is not proposed by the Bill, it is nonetheless a possibility DMG believes it should cover. To introduce new participants into the commercial radio industry and thereupon change the ownership structure of the industry, without doing the same to the newspaper industry and commercial television industry, could not be justified on any basis whatsoever. It would damage the commercial radio industry in all of the ways identified in this submission while, at the same time, protecting the ownership structure of and preventing new entrants from participating in the newspaper industry and commercial television industry.
- 2.12 In all of these circumstances, DMG submits that consideration of the proposed reforms to the ownership and control regime of the media industry should be deferred until the ABA's planning and allocation exercise is complete.
- 2.13 The rest of this submission discusses some of these points in more detail.

3 The State of the Commercial Radio Market

- 3.1 The commercial radio industry in Australia has been in a state of flux for many years. With the introduction of the BSA in 1992, the industry commenced a process of fundamental reform, including reform of the ownership and control regime and the basis upon which new licences were to be made available. That process is now nearing completion.
- 3.2 In 1992, when the BSA was enacted, a consensus approach was agreed between industry participants in relation to the future of commercial radio in Australia. The consensus approach is reflected in four significant provisions of the BSA which shape the state of the industry today.
- The prohibition against a person who controlled a newspaper or commercial television station also controlling a commercial radio station in the same market which was introduced into the *Broadcasting Act 1942* ("1942 Act") in 1987 was retained.
 - The prohibition against owning more than one commercial radio station in a single market which existed under the 1942 Act was removed. Henceforth, commercial radio operators would be allowed to generate efficiencies and economies of scale by owning up to two licences in a market.

- The degree of market concentration which would inevitably arise as a result of allowing a person to control two licences in a market would be offset by making available additional commercial licences. The ABA would undertake a planning and allocation exercise covering all of Australia. This exercise was to be completed by 1996 at the latest and would introduce effective competition after the incumbent operators had been given the opportunity to consolidate their position in the market.
- The “beauty parade” allocation system for new commercial licences which existed under the 1942 Act was removed. New commercial licences would henceforth be allocated to aspirant broadcasters under a price-based allocation system. Under that system a new licence would be awarded to the highest bidder at a competitive auction. The introduction of the price-based allocation system was, of course, accompanied by a legitimate expectation on the part of the participants that the fundamental rules of the game would not change mid-stream (ie before completion of the planning and allocation exercise). The planning and allocation exercise would not only be commenced, but also completed, in accordance with the same set of rules (ie the BSA as enacted in 1992).

- 3.3 However, not all has gone to plan. The first stage of reform, being the consolidation of the market position of the existing broadcasters, took place in quick time (in the main by 1994). The incumbent operators took the opportunity to achieve the economies of scale offered by owning up to two licences in a market. However, contrary to initial expectations, the licence planning and allocation exercise is still not complete. The planning side of the exercise was completed in December 2001. In accordance with the conclusions of the planning side of the exercise, more than 40 new licences have been allocated in regional licence areas (1996 to 2001) and the first of the new licences have been issued in Sydney (2000), Melbourne (2000), Brisbane (2001) and Perth (2002). However, further new licences are planned, but yet to be allocated, in Gosford (2002), Adelaide (2003), Sydney (2003), Melbourne (2004), Brisbane (2004) and the Gold Coast and Sunshine Coast (dates to be announced, but expected before 2003). It is anticipated that the process will be fully complete sometime in 2004. This will mean completion of the process will have taken 3 times longer than originally expected.
- 3.4 As a result of these developments, Austereo and ARN have emerged as the two dominant broadcasters on the FM band in the key metropolitan markets, but the anticipated introduction of competition has been delayed by more than 5 years. During this period they have been operating in an artificially insulated market which has allowed them to operate free from effective competition and acquire significant market power. Together, Austereo and ARN now account for the majority of the FM metropolitan commercial radio advertising market and have been able to generate astonishing growth and profits, unparalleled by any other form of media.
- 3.5 The delay in completing the planning and allocation process has meant that the commercial radio industry today is characterised by extraordinary levels of concentration, particularly in metropolitan markets on the FM band. Aspirant broadcasters have suffered extreme prejudice as a result. They have been required to wait an inordinate time to be able to participate and then to make substantial investments to acquire the right to enter

the commercial radio market (and at first with only one new licence in the major metropolitan markets), whereupon they have been faced with levels of concentration and market power, built up over almost a decade, which significantly limit the ability of the new entrants to meaningfully compete with the dominant FM networks (who have two licences already in those markets). This situation could have been avoided if the new licences were made available, and effective competition introduced, in a more timely manner (ie before the dominant FM networks had the opportunity to cement the current levels of concentration and market power).

- 3.6 At the end of the day, some new entrants decided that it was still worthwhile participating in the auctions and making an attempt to establish effective competition against the dominant FM networks. DMG was one of those new entrants. These decisions were made, however, on the basis that the ownership and control regime would not change, before the issue of the second new licences in the major capital cities and, therefore, before these new entrants had a fair opportunity to acquire those second licences at auction and build networks which could compete on “all fours” with the existing networks.
- 3.7 DMG, through the establishment of its Nova stations in Sydney and Melbourne, has just started the process of providing some form of competition to Austereo and ARN. It would be unfair to DMG and to the industry as a whole if the ownership and control structure of the industry were altered in a manner which would undermine the development of a competitive and efficient market by allowing the dominant networks to continue unhindered by the effective competition which would spawn from a third network of two FM licences in the major metropolitan cities.
- 3.8 In short, if the cross-media rules are relaxed now, there will be much greater competition for the second licences to be issued in the major capital cities. At a superficial level that might be thought attractive. But it is not. It could have two disastrous outcomes. First, owners of newspapers or commercial television in those capital cities could outbid those radio operators who purchased the first new licences only one or two years ago. That is because owners of newspapers or commercial television might perceive enormous benefits through the ownership of a radio station together with their other media interests in the same market. If that happens, the opportunity for a third FM network of two stations to be established, in order to provide effective competition against the existing dominant networks, would be lost. In other words, there would be a failure at the eleventh hour of the very rationale of the BSA, as enacted in 1992. Secondly, if those radio operators who purchased the first licences only one or two years ago, feel that it is necessary to over bid the previously prohibited proprietors of other media in order to acquire the second licences and develop a third network to compete against the existing dominant networks, the bidding war could mean that the prices paid are significantly inflated (which would itself reduce the ability of the third network to compete effectively against the existing dominant networks). Inflated prices were one of the primary reasons for the financial difficulties in the commercial radio industry in the late 1980’s and very early 1990’s. DMG submits that it would be reckless to create an environment where the errors of the past might be repeated by relaxing the cross-media rules at this stage of the industry’s development.

3.9 In these circumstances, as discussed below, removal of the cross-media rules could have devastating effects on the new entrants into the commercial radio market who have acquired their licences under the BSA's price-based allocation system and could also have devastating affects on the commercial radio industry itself in Australia.

4 The Affect on New Entrants

4.1 As described above, at the time the BSA was enacted the future of the radio industry was to unfold on the basis that a new licence could not be taken up by a person who already controlled two commercial radio licences, or a newspaper or commercial television licence in the same market. These provisions were fundamental to the future of the industry because they were to go hand-in-hand with the system of making new licences available to the person who was willing to pay the highest price. They determined who could (and equally importantly, who could not) take up the new licences. Therefore, as a matter of basic economic principle, the ownership and control regime in the BSA had a profound effect on the amount which aspirant broadcasters were prepared to bid for new licences at auction.

4.2 If implemented immediately, the Bill will allow owners of other forms of media to participate in the remaining auctions. To do so constitutes a change in the rules while the game is still being played in a manner which can only operate to the prejudice of those who have acquired licences at the completed auctions under the existing rules. A critical element in this development is that a commercial radio licence may be worth a lot more to the owner of a television station or a newspaper than to other existing or aspirant owners in the commercial radio market. Accordingly, owners of other forms of media may have the incentive to pay a higher price at licence auctions.

4.3 The new entrants relied upon the ownership structure enshrined in the BSA. This was the platform on which the agreed consensus approach was built in 1992. To alter that platform at this stage of the exercise (particularly in circumstances where it is so close to being completed) would give rise to a grave imbalance between the conduct of licence auctions which take place before and after the change. This position would be unacceptable to the new entrants.

4.4 The licences already issued pursuant to previous auctions in the past and the licences which will be issued pursuant to auctions in the near future, are all licences which were planned in accordance with the consensus approach built into the BSA in 1992. The planning and allocation process undertaken pursuant to the consensus approach is now almost complete. That process has been running for ten years and it has no more than two years left.

4.5 New entrants were not just permitted, but encouraged, under the consensus approach, to bid for the first licences in the legitimate expectation that they would have an equal opportunity to bid for (and an equal ability to win) the second licences, in the major capital cities. To relax the cross-media rules now, insofar as they relate to the commercial radio industry, would be to ignore and override the legitimate expectations of the new entrants. They were encouraged to participate in the first round of auctions and to pay prices at those auctions on the basis of an assumed industry structure which would

continue to exist at the time of the second (and final) round of auctions. But the Bill now proposes to disturb that structure after the first round of auctions but before the second (and final) round of auctions, to the obvious detriment of the new entrants. DMG submits that this course of events would be both unfair and also a warning to potential future participants in the media industry that they cannot rely on government to complete processes which they have themselves started on a consistent basis and in accordance with the same rules. DMG believes that such a result would be against the best long term interests of this country.

- 4.6 The appropriate time (if at all) to allow owners of other forms of media to participate in the commercial radio industry is when the licence planning and allocation exercise is complete. At that point, they would be permitted to acquire, or participate in the ownership of, existing stations. There will be no more auctions. This would allow the structure of the commercial radio industry to stabilise and benefit from the introduction of effective competition through the establishment of a third network, without enabling owners of other forms of media to “cherry pick” radio assets at auction in a manner which interferes with the natural and planned development of the industry.
- 4.7 The situation is all the more grave in light of the levels of concentration created by the delays in the planning and allocation exercise. The current state of the competitive structure of the industry has placed the new entrants at an immediate competitive disadvantage to the two dominate networks. The implementation of the Bill at this stage of the licence planning and allocation exercise would inflict an additional disadvantage on the new broadcasters because it will significantly limit their ability to acquire the vital remaining licences required to establish a national network which is the only way of competing, in any meaningful way, with the two dominant network providers of FM commercial radio. At very least, even if the new broadcasters are successful at the remaining round of licence auctions, they may be forced to pay a price which is inflated to a point where acceptable rates of return cannot realistically be achieved in the short to medium term.
- 4.8 It is an important point that the *Trade Practices Act* 1974 (“TPA”) has no application in the present context and is unable to prevent the deterioration of the competitive structure of the commercial radio market if the cross-media rules are relaxed. This is for two reasons. First, the TPA only prohibits acquisitions which have the effect of substantially lessening competition in a market. The ACCC and the Productivity Commission have made it clear that the market for commercial radio is a different market than for newspapers or television. Accordingly, the acquisition of a commercial radio licence by the owner of a television station will not affect the competitiveness of the market for the purposes of the TPA notwithstanding the profound affect it may have on the long term competitive structure of the overall market. Second, the ACCC in its 1994 market definition paper in relation to commercial radio, has made it clear that the TPA does not apply to the issue of a new licence by the ABA. It only applies to the acquisition of an existing licence by private agreement. Accordingly, the allocation of a new licence at auction will fall outside the jurisdiction of the TPA. Ultimately, this means that the current ownership and control regime is the only regulatory safeguard against the deterioration of the competitive structure of the commercial radio industry.

- 4.9 Of course, DMG accepts that the conduct of business in any industry involves some form of political risk that the regulatory landscape will be altered at some point in the future. However, in this case, the only considerations which militate in favour of immediate relaxation of the cross-media rules in relation to commercial radio are political considerations. DMG submits that, in an industry such as the media which is subject to high levels of government regulation, issues of regulatory fairness and maintenance of competition cannot give way to purely political exigencies.
- 4.10 The immediate repeal of the cross-media rules in relation to commercial radio would involve a fundamental departure from the consensus approach agreed at the time of the introduction of the BSA. The industry has relied on the continuation of that ownership regime until completion of the planning and allocation exercise. To do so was entirely reasonable in light of the fact that this process was to be completed by 1996. To now disturb that ownership regime before the industry has had the opportunity to fully reap the benefit of the BSA reforms would give rise to a political risk of an unacceptable level. Media owners generally would need to reassess their investment in the Australian market if it becomes apparent to them that they would be subject to ad hoc and unexpected changes to fundamental aspects of the regulatory regime.
- 4.11 It is submitted that the legislature must look beyond any superficial attraction to immediately repeal the cross-media rules and instead must support the long term future of the commercial radio industry, including its competitive structure.

5 The Intention of the Bill and its Effect on the Commercial Radio Industry

- 5.1 The Explanatory Memorandum which accompanies the Bill states that the objective of the reforms is to “improve competition in the media sector while supporting the objects of the BSA”. However, DMG submits that the most effective way of achieving these objectives is to maintain the status quo until completion of the ABA’s planning and allocation exercise.
- 5.2 As already mentioned, the two-to-a-market rule was an important element in the package of reforms enacted by the BSA. The introduction of that rule permitted the emergence of the two dominant national networks both of which today hold two licences in each of the major metropolitan cities. One of the objectives of the 1992 reforms enacted by the BSA was to make available a sufficient number of new licences in each of the capital cities to create the opportunity for the development of a third national network which was capable of competing, in a meaningful way, with the incumbent networks.
- 5.3 Today, DMG has laid the foundation for the creation of a third network of two licences in each capital city through acquiring new licences at the Sydney, Melbourne, Brisbane and Perth auctions. It would like to complete that network by participating in the remaining round of auctions in Adelaide, Sydney, Melbourne and Brisbane.
- 5.4 If the current ownership and control regime is altered to permit owners of other forms of media to participate in the forthcoming licence auctions, there is a real likelihood that the competitive structure of the industry will be damaged. If the owners of other forms of media were successful at the forthcoming licence auctions, the capital city markets would

be made up of the two dominant networks (with two licences each) and a series of individual licensees who are incapable of providing any degree of countervailing market power.

- 5.5 DMG submits that the best, and indeed the only, way to improve competition in the commercial radio industry is to provide a regulatory environment which creates and encourages the creation of a third national network with two licences in each major capital city. Any other structure will simply assist the two existing networks to entrench their dominance. Moreover, given the relative shortage of available licences for sale, the issue of new licences at auction is the best and most conducive (and in practice the only) way of allowing a third network to develop.
- 5.6 The potential synergies which owners of other forms of media may generate with their existing media assets places them in a strong position to bid a price at the forthcoming auctions which will win them the new licences. Of course, it does not automatically follow that relaxation of the cross-media rules will mean that those owners of other forms of media will win the new licences. However, the important point is that relaxation of the cross media rules gives rise to that possibility (and also to the possibility of inflated prices being paid). In allowing for that possibility, any relaxation of the cross-media rules before the completion of the licence planning and allocation exercise jeopardises the introduction of effective competition from a third network in a manner which would defeat the very purpose of the Bill.
- 5.7 It is also noted that one of the objects of the BSA is to provide a regulatory environment which will facilitate the development of a broadcasting industry which is efficient, competitive and responsive to audience needs (s 3(b)). For the reasons mentioned above, DMG submits that the immediate relaxation of the cross-media rules in relation to commercial radio would, contrary to the intent of the Bill, undermine that objective.

6 Conclusion

- 6.1 In the circumstances described above, DMG submits that a moratorium be placed on any alteration to the regime governing ownership and control of the media sector until the ABA's licence planning and allocation exercise for commercial radio is complete.
- 6.2 If, notwithstanding the compelling arguments to the contrary, the Senate Committee is persuaded that it is an appropriate time to relax cross-media ownership restrictions generally, DMG submits that the commercial radio industry should not be included in the current reforms.
- 6.3 Alternatively, if the Senate Committee is persuaded that it is an appropriate time to relax cross media ownership restrictions even in relation to the commercial radio industry, it is imperative that the relaxation of those restrictions must be subject to the proviso (or "carve out") that any owner of a commercial radio licence, commercial television licence or newspaper in a licence area, who would have been prohibited from participating in the auction of a new commercial radio licence in that licence area under the existing rules, will not be permitted to participate in any such auction. In other words, even if the cross media ownership restrictions are relaxed in relation to the commercial radio industry, the

second (and final) round of auctions should be conducted in accordance with the existing ownership and control restrictions and not in accordance with the new rules. This would mean that owners of radio, television or newspapers in the relevant licence area would be able to acquire one of the existing networks but prevented from participating in the auctions and thereby interfering with the possible establishment of a third viable network.

- 6.4 Finally, it is important to make the point that DMG is not simply espousing a self-serving position by putting forward the views expressed above. Quite the opposite. DMG would experience an immediate appreciation in the value of its commercial radio assets if the ownership and control restrictions were lifted today. Indeed, DMG and its shareholders have as much to gain as anyone by the package of reforms contained in the Bill. DMG simply makes the point that the commercial radio industry is not yet in a position to absorb any change to its current ownership structure, a point which was previously made by DMG in 1999 to the Productivity Commission during its inquiry into broadcasting. DMG has entered the commercial radio industry in this country for the long term. It is not a short term trader. That is why it is much more interested in its ability to develop a long term competing network than it is in any increase in the value of its media assets (and ultimately in the share prices of its parent company) which would arise today if the cross media restrictions were relaxed. DMG intends to establish a competing network which will improve competition and diversity in our market in the long term. It does not intend to capitalise on short term price increases. DMG contends that its approach is in the best interests of the commercial radio industry and also in the best interests of audiences who will benefit from increased competition and diversity.
- 6.5 Relaxation of the cross media rules today, insofar as they relate to the commercial radio industry, is encouraged only by those participants in the industry who wish to exit. Relaxation of the rules will increase the demand for their stations and enable them to exit at the highest possible price. Those who wish to remain in the industry long term and to contribute to competition and diversity, are more interested in the stability of the ownership and control structure and the establishment of a competing network which will add to that competition and diversity.

**DMG RADIO
TABLE OF COMMERCIAL RADIO BROADCASTING LICENCES**

Call Sign	Licence Area
South Australia	
5AA (AM)	Adelaide
5SE (963 AM)	Mt Gambier
5SEF (96.1FM)	Mt Gambier
Victoria	
100.3 FM	Melbourne
3BDG (91.9FM)	Bendigo/Maryborough
3BBO (93.5FM)	Bendigo/Maryborough
3MDA (99.5FM)	Mildura
3RMR (97.9FM)	Mildura
New South Wales	
NOVA FM (96.9FM)	Sydney
2AY (1494AM)	Albury
2AAY (104.9FM)	Albury
2CSF (105.5FM)	Coffs Harbour
2CSF (106.3FM)	Coffs Harbour
2RG (963AM)	Griffith
2RGF (99.7FM)	Griffith
2OAG (105.1FM)	Orange
2GZF (105.9FM)	Orange

Call Sign	Licence Area
2ROX (105.1FM)	Kempsey
2PQQ (106.7FM)	Kempsey
2WZD (93.1FM)	Wagga
2WG (1152AM)	Wagga
2LFF (93.9FM)	Young
2LF (1350AM)	Young
2DBO (93.5FM)	Dubbo
Queensland	
97.3FM*	Brisbane
4BH	Brisbane
4CA (103.5FM)	Cairns
4CCA (102.7FM)	Cairns
4CHT (95.9FM)	Charters Towers
4CG (828AM)	Charters Towers
4HIT (94.7FM)	Emerald
4HI (1143AM)	Emerald
4MKY (100.3FM)	Mackay
4MMK (101.9FM)	Mackay
4AMM (97.9FM)	Mareeba
4AM (558AM)	Mareeba
4MIC (102.5FM)	Mt Isa
4LM (666AM)	Mt Isa

Call Sign	Licence Area
4ROK (107.9FM)	Rockhampton/Gladstone
4CC (927AM)	Rockhampton/Gladstone
4ROM (95.1FM)	Roma
4ZR (1476AM)	Roma
4RAM (103.1FM)	Townsville
4TOO (102.3FM)	Townsville
Western Australia	
6AAY (106.5FM)	Albany
6VA (783AM)	Albany
6BY (900AM)	Bridgetown
6BET (1269AM)	Bridgetown
6TZ (963AM)	Bunbury
6BUN (95.7FM)	Bunbury
6SEA (102.3FM)	Esperance
6SE (747AM)	Esperance
6KAR (97.9FM)	Kalgoorlie
6KG (981AM)	Kalgoorlie
6KAN (94.9FM)	Katanning
6WB (1071AM)	Katanning
6MER (105.1FM)	Merredin
6MD (1098AM)	Merredin
6NAN (100.5FM)	Narrogin

Call Sign	Licence Area
6NA (918AM)	Narrogin
6NAM (96.5FM)	Northam
6AM (864AM)	Northam
93.7 MHz*	Perth

* denotes 50/50 joint venture with Australian Radio Network Pty Ltd.