

Annual report of regulatory compliance

provided to the ACCC pursuant to section 118PN of the Radiocommunications Act in relation to the 2019-2020 financial year

Digital Radio Joint Venture Companies

Adelaide, Brisbane, Melbourne, Perth and Sydney

Public version

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Contents

1.	Executive summary.....	1
2.	Compliance with digital radio access undertaking	2
3.	Compliance with standard access obligations.....	12
4.	Compliance with excess-capacity access obligations	12
5.	Compliance with non-discrimination obligation	13
6.	Changes to membership.....	13
7.	Authorisation of third party users	13
Attachment A	List of JVCs submitting this annual report.....	14
Attachment B	JVC membership for 2019-2020 financial year	15

1. Executive summary

1.1 Background

This document constitutes the annual report of regulatory compliance by the digital radio multiplex transmission licensees in Adelaide, Brisbane, Melbourne, Perth and Sydney (**JVCs**) under section 118PN of the *Radiocommunications Act 1992* (Cth) for the 2019-2020 financial year.¹

On 22 April 2009, the Australian Competition & Consumer Commission (**ACCC**) determined that an ACCC-modified access undertaking was to apply to multiplex transmission capacity services by the JVCs pursuant to section 118NF(5) of the Radiocommunications Act (the **access undertaking**). The ACCC accepted a revised variation to the access undertaking on 19 December 2013 pursuant to section 118NH of the Radiocommunications Act.

Section 118PN of the Radiocommunications Act provides that, if an access undertaking is in force during the whole or part of a financial year, the JVCs must submit annual reports to the ACCC within 60 days of the end of the financial year, on the following:

- matters specified in the *Digital Radio Multiplex Transmitter Licence Procedural Rules 2018* made by the ACCC under section 118PO of the Radiocommunications Act (**Procedural Rules**); and
- matters that relate to:
 - compliance during that financial year with the access undertaking;
 - compliance during that financial year with the standard access obligations (if any) applicable to the licence;
 - compliance during that financial year with the excess-capacity access obligations (if any) applicable to the licence;
 - compliance during that financial year with the distributed-capacity access obligations (if any) applicable to the licence; or
 - compliance during that financial year with the obligations that are applicable to the licence under section 118NP.

The Procedural Rules require the JVCs to cover the following matters within an annual report:

- compliance during that financial year with the access undertaking;
- compliance during that financial year with standard access obligations (if any) applicable to the licence;

¹ Further details about the entities that have lodged this annual report are set out in Attachment A.

- compliance during that financial year with excess-capacity access obligations (if any) applicable to the licence;
- compliance during that financial year with obligations that are applicable to the licence under section 118NP of the Radiocommunications Act (i.e. the JVCs' non-discrimination obligation);
- any non-compliance (including reasons) with the above;
- steps taken to rectify non-compliance;
- expected completion dates for matters requiring rectification;
- changes to the membership of the JVCs that have occurred during the financial year; and
- any authorisation of third party users.

This annual report covers the matters identified in section 118PN of the Radiocommunications Act and the Procedural Rules in relation to the 2019-2020 financial year.

1.2 Overview of findings

The 2019-2020 financial year was the eleventh year in which the JVCs supplied multiplex transmission services to access seekers pursuant to an access undertaking.

The JVCs have been materially compliant with the legislative requirements of the Radiocommunications Act and the terms of the access undertaking and access agreement for the 2019-2020 financial year. The JVCs have supplied the Multiplex Transmission Service to all content service providers in accordance with their legislative and regulatory obligations.

1.3 Confidentiality

There are aspects of this Annual Report that are confidential to the JVCs and which are identified in this document as [C-I-C]. It is requested that aspects of this report that are identified as confidential not be disclosed to the public in accordance with section 13 of the Procedural Rules.

The JVCs do not object to the disclosure of this annual report in its entirety to the Australian Communications and Media Authority in accordance with section 16(1)(f) of the Procedural Rules.

2. Compliance with digital radio access undertaking

2.1 Overview

This section sets out whether the JVCs are compliant with key aspects of the access undertakings, including the access agreement that forms part of the access undertakings

and which set out the terms on which the JVCs supply the multiplex transmission service to access seekers.

This annual report does not cover all aspects of the access undertaking and access agreement given there are many aspects of these documents that are non-substantive, or which were not operative or relied upon during the 2019-2020 financial year.

The areas of the access undertaking and access agreement covered in this section include:

- the supply obligations of the JVCs in respect of the multiplex transmission service under clause 9 of the access agreement;
- the obligations of the JVCs in respect of financial security under clause 14 of the access agreement; and
- the compliance by the JVCs with the pricing principles in Schedule 2 of the access agreement, including:
 - the efficient cost principle for the inclusion of capital expenditure, operating expenditure and overheads into the cost base of the JVCs under clause 3.1 of Schedule 2 of the access agreement (see section 2.4);
 - the determination of the weighted average cost of capital under clause 3.4 of Schedule 2 of the access agreement (see section 2.5); and
 - the criteria for the calculation of access fees under clause 4 of Schedule 2 of the access agreement (see section 2.6).

This section does not explicitly consider the issue of compliance with the standard access obligations and excess capacity access obligations, which are covered in sections 3 and 4 below respectively.

2.2 Supply obligations

Clause 9 of the access agreement:

- forbids the JVCs from preventing an access seeker from obtaining access to the multiplex transmission service in accordance with the access agreement;
- prohibits the JVCs from discriminating between access seekers to which it supplies the multiplex transmission service in relation to technical and operational quality of the service itself, and the technical and operational quality and timing of the fault detection, handling and rectification supplied in respect of the service – this requirement implements the non-discrimination requirement in section 118NP of the Radiocommunications Act; and
- requires that the JVCs make the standard access entitlements and excess-capacity access entitlements available to content service providers.

The JVCs are not aware of any non-compliance with clause 9 of the access agreement in the 2019-2020 financial year. The JVCs:

- did not prevent any access seeker from receiving the multiplex transmission service during that period;
- supplied the multiplex transmission service on an identical basis to all access seekers from a technical and operational quality perspective during that period; and
- allowed all holders of standard access entitlements and excess-capacity access entitlements to acquire and obtain the benefit of those entitlements.

2.3 Financial security

The JVCs did not require financial security directly from any digital commercial radio broadcasters or digital community radio broadcasters in the 2019-2020 financial year pursuant to the terms of an access agreement.

However, as part of the arrangements with the CBAA that support the acquisition of the multiplex transmission service by digital community radio broadcasters, the JVCs hold the equivalent of 3 months' access fees for 256 Kbps of multiplex capacity as financial security.

The amount of financial security (inclusive of GST) provided by the CBAA for the 2019-2020 financial year was as follows:

BSA radio area	Amount of financial security
Adelaide	\$39,415.51
Brisbane	\$54,932.12
Melbourne	\$71,062.08
Perth	\$39,557.77
Sydney	\$65,011.83

2.4 Efficient cost principle

Clause 3.1 of Schedule 2 of the access agreement limits the costs that the JVCs can recover from access seekers to those costs that have been efficiently incurred. Clause 3.2 and clause 3.3 of Schedule 2 of the access agreement sets out the specific types and categories of costs that are recoverable in accordance with the "Efficient Costs" principle, including:

- capital expenditure;
- operating expenditure; and
- expenditure on corporate overheads.

The JVCs consider that the costs that have been included within its cost base during the 2019-2020 financial year reflect the efficient costs incurred by the JVCs.

The primary costs incurred by the JVCs are in connection with the operation of the main multiplex transmitter site in each capital city and the thirteen on-channel repeater sites.

During the 2019-2020 financial year, the Sydney JVC brought the Como on-channel repeater site on-air. The Sydney JVC's costs included site access fees and capital

expenditure associated with the development and set up of that on-channel repeater site. The Sydney JVC also decommissioned the Redfern on-channel repeater site in early 2020.

As at 30 June 2020, there are thirteen on-channel repeater sites in operation. The following table summarises the 'go live' date for on-channel repeaters up to the end of the 2019-2020 financial year:

Site location	Operational ("on-air") date
Mount Mee, Brisbane	30 October 2013
Mount Badgelly, Sydney	15 October 2014
Collaroy, Sydney	5 May 2014
Centrepoint, Sydney	30 October 2013
Newport, Sydney	16 July 2014
Redfern, Sydney	30 October 2013 (site decommissioned on 29 January 2020)
Winmalee, Sydney	17 June 2015
Como, Sydney	1 May 2020
101 Collins Street, Melbourne	17 May 2012
Bacchus Marsh, Melbourne	26 March 2014
Fisherman's Bend, Melbourne	4 September 2014
Werribee, Melbourne	4 May 2016
Mindarie, Western Australia	28 May 2014
Central Park, Western Australia	21 November 2013

The capital and operating costs associated with the OCR rollout, and the JVCs' compliance with the efficient cost principle in relation to these costs, were discussed in the 2012-2013 annual report. In summary:

- in relation to capital expenditure – the JVCs procured on-channel repeater equipment through a competitive tendering method having regard to the total cost of ownership, thereby ensuring that costs were incurred prudently – this is notwithstanding the fact that the capital costs associated with OCRs have been funded from auction revenue incurred by the JVCs from the allocation of excess-capacity access entitlements; and
- in relation to operating expenditure – the JVCs chose the location of on-channel repeater sites based on their ability to mitigate identified black spots, while site access arrangements between the JVCs and tower/rooftop owners were entered on an arm's length basis and other operating costs (such as electricity costs) have been incurred by reference to standard procurement methods.

During the 2019-2020 financial year, the JVCs progressed the on-channel repeater rollout as follows:

- [C-I-C] [REDACTED]

[REDACTED]

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [C-I-C]

In addition to the rollout of OCRs described above, during the 2019-2020 financial year:

- the JVCs incurred only modest increases to the level of site access fees for its main transmission sites. [C-I-C] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [C-I-C]
- Broadcast Australia and Agile, as per the arrangements mentioned in the 2014-2015 annual report, had operational responsibility for the five main multiplex transmitter sites and all thirteen on-channel repeater sites in the 2019-2020 financial year.

[C-I-C] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
[REDACTED]
[REDACTED] [C-I-C]

- In January 2020, the OCR site at Redfern, Sydney was decommissioned ahead of a proposed redevelopment of the site on which the OCR is located. [C-I-C] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [C-I-C]

[C-I-C] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [C-I-C]

The JVCs are not aware of any non-compliance with the efficient cost principle contained within the pricing principles in Schedule 2 of the access agreement.

2.5 Weighted Average Cost of Capital

The WACC used by the JVCs during the 2019-2020 financial year is summarised below:

WACC	Value
Vanilla post-tax WACC	6.58%
Officer post-tax WACC	5.29%

As explained in our 2015-2016 annual report, the JVCs reviewed and updated the WACC in that financial year, with the updated WACC being reflected in the revised access fees for the first time in the 2016-2017 financial year.

The revised WACC was shared with the ACCC and approved by the JVC boards in May 2016 for application from the 2016-2017 financial year onwards.

The table below sets out the revised WACC that was used by the JVCs for the 2019-2020 financial year:

Parameter	2019-2020 WACC values	2011 WACC values
Gearing	30%	30%
Gamma	0.45	0.45

Risk free rate	2.85%	5.56%
Inflation	2.5%	2.52%
Equity beta	0.7	0.83
Market risk premium (MRP)	6.0%	6.0%
Cost of equity	7.05%	10.53%
Cost of debt	5.47%	9.49%
Vanilla WACC	6.58%	10.22%
Officer post-tax WACC	5.29%	8.17%

The JVCs will review the WACC periodically in coming years in consultation with the ACCC.

2.6 Calculation of access fees

Clause 4.1 of Schedule 2 of the access agreement provides that the JVCs will levy fixed recurring charges based on the amount of multiplex capacity allocated to an access seeker, regardless of whether such capacity is used.

Clause 4.2 establishes a formula for the conversion of the JVCs annualised costs into an annual fixed recurring charge, based on the following formula:

$$AFRC = AC \times BMC/TMC$$

Where:

AFRC is the annual fixed recurring charge.

AC is the annualised costs derived under clause 3 of Schedule 2 of the access agreement.

BMC is the amount of multiplex capacity allocated to the relevant access seeker.

TMC is the total amount of multiplex capacity allocated to all access seekers by the JVC.

The access fees payable by access seekers for the 2019-2020 financial year for standard access entitlements are set out below.

The price changes in all BSA radio areas took effect on 1 July 2019 and remained unchanged for the financial year. The changes were made in accordance with clause 5.2(a) of Schedule 2 of the access agreement, which allows the JVCs to review the fees payable by

access seekers to ensure consistency with the pricing principles established in Schedule 2 of the access agreement.

Access seekers received notice of the changes in accordance with clauses 5.2(c) and 5.2(f) of Schedule 2 of the access agreement.

The figures below are the access fees paid by the access seekers for the 2019-2020 financial year. The figures are exclusive of GST.

BSA Radio Area	Access Seekers	Q3 2019 Access Fee (per 32 Kbps, per quarter)	Q4 2019 Access Fee (per 32 Kbps, per quarter)	Q1 2020 Access Fee (per 32 Kbps, per quarter)	Q2 2020 Access Fee (per 32 Kbps, per quarter)	Total Access Fee paid 2019-2020 financial year (per 32 Kbps)
1. Adelaide	5AD Broadcasting Pty Limited	\$4,790	\$4,790	\$4,790	\$4,790	\$19,160
	Festival City Broadcasting Pty Limited	\$4,790	\$4,790	\$4,790	\$4,790	\$19,160
	Nova 91.9 Pty Limited	\$4,790	\$4,790	\$4,790	\$4,790	\$19,160
	SCA Digital Pty Limited	\$4,790	\$4,790	\$4,790	\$4,790	\$19,160
	Southern State Broadcasters Pty Limited	\$4,790	\$4,790	\$4,790	\$4,790	\$19,160
	Triple M Adelaide Pty Limited	\$4,790	\$4,790	\$4,790	\$4,790	\$19,160
	Digital Community Broadcasters	\$4,790	\$4,790	\$4,790	\$4,790	\$19,160
2. Brisbane (Channel 9A and 9B)	ARN Communications Pty Limited	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
	Brisbane FM Radio Pty Limited	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
	UBET Radio Pty Limited	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
	Nova 106.9 Pty Limited	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
	Radio Magic 882 Brisbane Pty Ltd	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
	Radio 4BC Brisbane Pty Limited	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
	Today FM Brisbane Pty Limited	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540

BSA Radio Area	Access Seekers	Q3 2019 Access Fee (per 32 Kbps, per quarter)	Q4 2019 Access Fee (per 32 Kbps, per quarter)	Q1 2020 Access Fee (per 32 Kbps, per quarter)	Q2 2020 Access Fee (per 32 Kbps, per quarter)	Total Access Fee paid 2019-2020 financial year (per 32 Kbps)
	Triple M Brisbane Pty Limited	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
	Digital Community Broadcasters	\$3,635	\$3,635	\$3,635	\$3,635	\$14,540
3. Melbourne (Channel 9A and 9B)	3UZ Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	ARN Broadcasting Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Double T Radio Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Malbend Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Nova 100 Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Radio 1278 Melbourne Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Radio 3AW Melbourne Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	SCA Digital Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	SmoothFM 91.5 Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Triple M Melbourne Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Victorian Radio Network Pty Limited	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
	Digital Community Broadcasters	\$4,689	\$4,689	\$4,689	\$4,689	\$18,756
4. Perth	Consolidated Broadcasting Systems (W.A.) Pty Ltd	\$4,745	\$4,745	\$4,745	\$4,745	\$18,980
	Perth FM Radio Pty Ltd	\$4,745	\$4,745	\$4,745	\$4,745	\$18,980
	Nova Entertainment (Perth) Pty Ltd	\$4,745	\$4,745	\$4,745	\$4,745	\$18,980

BSA Radio Area	Access Seekers	Q3 2019 Access Fee (per 32 Kbps, per quarter)	Q4 2019 Access Fee (per 32 Kbps, per quarter)	Q1 2020 Access Fee (per 32 Kbps, per quarter)	Q2 2020 Access Fee (per 32 Kbps, per quarter)	Total Access Fee paid 2019-2020 financial year (per 32 Kbps)
	Radio Perth Pty Ltd	\$4,745	\$4,745	\$4,745	\$4,745	\$18,980
	Radio 96FM Pty Ltd	\$4,745	\$4,745	\$4,745	\$4,745	\$18,980
	Radio 6PR Perth Pty Ltd	\$4,745	\$4,745	\$4,745	\$4,745	\$18,980
	Digital Community Broadcasters	\$4,745	\$4,745	\$4,745	\$4,745	\$18,980
5. Sydney	2KY Broadcasters Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	ARN Communications Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Commonwealth Broadcasting Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Harbour Radio Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Nova 96.9 Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Radio 2CH Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Radio 2SM Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Radio 2UE Sydney Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	SmoothFM 95.3 Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Today FM Sydney Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Triple M Sydney Pty Limited	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476
	Digital Community Broadcasters	\$4,619	\$4,619	\$4,619	\$4,619	\$18,476

The JVCs are not aware of any non-compliance with clause 5 of Schedule 2 of the access agreement in the 2019-2020 financial year.

3. Compliance with standard access obligations

Section 118NL of the Radiocommunications Act imposes standard access obligations on the JVCs, which in turn require the JVCs to supply multiplex capacity to those content service providers that hold standard access entitlements.

The process for the implementation of standard access entitlements is set out in section 118NQ of the Radiocommunications Act.

The JVCs have made standard access entitlements available with the incumbent commercial broadcasters pursuant to section 118NQ of the Radiocommunications Act.

The Radiocommunications Act also requires that the JVCs reserve two-ninths of multiplex capacity under each digital radio multiplex transmitter licence for digital community broadcasters that are nominated by the digital community radio broadcasting representative company (**Representative Company**) to claim the standard access entitlement.²

The JVCs have made available standard access entitlements to all digital community broadcasters that have been nominated by the Representative Company as being eligible to acquire multiplex capacity in the designated BSA radio area.

The JVCs have met this requirement by allocating standard access entitlements to digital community broadcasters in the 2019-2020 financial year pursuant to the requirements of the Radiocommunications Act and the arrangements that were previously put in place with the CBAA and digital community radio broadcasters.

The JVCs are not aware of any non-compliance with their standard access obligations for the 2019-2020 financial year.

4. Compliance with excess-capacity access obligations

Section 118NM of the Radiocommunications Act imposes excess-capacity access obligations on JVCs, which in turn require the JVCs to supply multiplex capacity to those content service providers that hold excess-capacity access entitlements acquired in accordance with section 118NT of the Radiocommunications Act.

The JVCs have made excess-capacity access entitlements available to incumbent commercial broadcasters pursuant to section 118NT of the Radiocommunications Act. Further details are available in the 2009-2010 annual report.

No further excess capacity access entitlements were allocated to content service providers in the 2019-2020 financial year.

² Radiocommunications Act, section 118NR(2). See also clause 6.4(b) of access agreement.

The JVCs have made available excess-capacity access entitlements to all content service providers that are eligible to acquire the associated multiplex capacity in the designated BSA radio area.

The JVCs are not aware of any non-compliance with their excess capacity access obligations for the 2019-2020 financial year.

5. Compliance with non-discrimination obligation

Section 118NP of the Radiocommunications Act prohibits discrimination by the JVCs between content service providers that have access to multiplex capacity in relation to the following:

- the technical and operational quality of the services supplied to the content service providers; and
- the technical and operational quality and timing of the fault detection, handling and rectification supplied to the content service providers.

This obligation is also reflected in clause 9.3 of the access agreement.

The JVCs are not aware of any non-compliance with their non-discrimination requirements.

The JVCs have supplied the multiplex transmission service on an identical basis to all access seekers from a technical and operational quality perspective, including in respect of fault detection, handling and rectification.

This covers the supply of both standard access entitlements and excess-capacity access entitlements.

6. Changes to membership

There were no changes to the membership structure of any of the JVCs during the 2019-2020 financial year.

Attachment B sets out the membership of the JVCs, including the percentage of shareholdings of the shareholders.

7. Authorisation of third party users

Section 114(1) of the Radiocommunications Act provides that the JVCs may, by written instrument, authorise a third party to operate radiocommunications devices under the licence.

During the 2019-2020 financial year, the JVCs have not authorised any third parties to operate radiocommunications devices under this section.

Attachment A List of JVCs submitting this annual report

This annual report for 2019-2020 has been submitted by the following entities:

- Digital Radio Broadcasting Adelaide Pty Ltd (ACN 128 742 772) – Foundation Category 1 Digital Radio Multiplex Transmitter Licence Number 1901330
- Digital Radio Broadcasting Brisbane Pty Ltd (ACN 128 742 950) – Foundation Category 1 Digital Radio Multiplex Transmitter Licence Number 1901423 and 1901424
- Digital Radio Broadcasting Melbourne Pty Ltd (ACN 128 742 898) – Foundation Category 1 Digital Radio Multiplex Transmitter Licence Number 1901421 and 1901422
- Digital Radio Broadcasting Perth Pty Ltd (ACN 128 742 638) – Foundation Category 1 Digital Radio Multiplex Transmitter Licence Number 1901331
- Digital Radio Broadcasting Sydney Pty Ltd (ACN 128 742 978) – Foundation Category 1 Digital Radio Multiplex Transmitter Licence Number 1901419 and 1901420.

Attachment B JVC membership for 2019-2020 financial year³

Digital Radio Broadcasting Adelaide Pty Ltd	Number of shares	Shareholding percentage
5AD Broadcasting Company Pty Limited	13,000	16.66%
Festival City Broadcasters Pty Limited	13,000	16.66%
Nova 91.9 Pty Limited	13,000	16.66%
SCA Digital Pty Limited	13,000	16.66%
Southern State Broadcasters Pty Limited	13,000	16.66%
Triple M Adelaide Pty Limited	13,000	16.66%
Total	78,000	100%

Digital Radio Broadcasting Brisbane Pty Ltd	Number of shares	Shareholding percentage
ARN Communications Pty Limited	10,000	12.50%
Brisbane FM Radio Pty Limited	10,000	12.50%
UBET Radio Pty Limited	10,000	12.50%
Nova 106.9 Pty Limited	10,000	12.50%

³ Please note that shareholdings have been rounded to 2 decimal points.

Radio Magic 882 Brisbane Pty Limited	10,000	12.50%
Radio 4BC Brisbane Pty Limited	10,000	12.50%
Today FM Brisbane Pty Limited	10,000	12.50%
Triple M Brisbane Pty Limited	10,000	12.50%
Total	80,000	100%

Digital Radio Broadcasting Melbourne Pty Ltd	Number of shares	Shareholding percentage
3UZ Pty Limited	7,000	9.09%
ARN Broadcasting Pty Limited	7,000	9.09%
Double T Radio Pty Limited	7,000	9.09%
Malbend Pty Limited	7,000	9.09%
Nova 100 Pty Limited	7,000	9.09%
Radio 1278 Melbourne Pty Limited	7,000	9.09%
Radio 3AW Melbourne Pty Limited	7,000	9.09%
SCA Digital Pty Limited	7,000	9.09%
SmoothFM 91.5 Pty Limited	7,000	9.09%
Triple M Melbourne Pty Limited	7,000	9.09%
Victorian Radio Network Pty Limited	7,000	9.09%
Total	77,000	100%

Digital Radio Broadcasting Perth Pty Ltd	Number of shares	Shareholding percentage
Consolidated Broadcasting Systems (W.A.) Pty Ltd	13,000	16.67%
Perth FM Radio Pty Ltd	13,000	16.67%
Nova Entertainment (Perth) Pty Ltd	13,000	16.67%
Radio Perth Pty Ltd	13,000	16.67%
Radio 96FM Perth Pty Ltd	13,000	16.67%
Radio 6PR Perth Pty Ltd	13,000	16.67%
Total	78,000	100%

Digital Radio Broadcasting Sydney Pty Ltd	Number of shares	Shareholding percentage
2KY Broadcasters Pty Limited	342,425	9.27%
ARN Communications Pty Limited	416,964	11.29%
Commonwealth Broadcasting Corporation Pty Limited	416,964	11.29%
Harbour Radio Pty Limited	7,000	0.19%
Nova 96.9 Pty Limited	416,964	11.29%
Radio 2CH Pty Limited	7,000	0.19%
Radio 2SM Pty Limited	416,964	11.29%

Radio 2UE Sydney Pty Limited	416,964	11.29%
Today FM Sydney Pty Limited	416,964	11.29%
Triple M Sydney Pty Limited	416,964	11.29%
SmoothFM 95.3 Pty Limited	416,964	11.29%
Total	3,692,137	100%

