



17 July 2024

Lyn Beverly, Committee Secretary
Environment and Communications Legislation Committee
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CANBERRA ACT 2600

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Cc: Minister for Communications, the Hon Michelle Rowland MP;
Minister.rowland@mo.communications.gov.au

Dear Committee

I write on behalf of the Community Broadcasting Association of Australia (CBAA) in regard to the Communications Legislations Amendment (Regional Broadcasting Continuity) Bill 2024.

Free-to-air broadcasting is special

The CBAA fully supports comments made by the Minister for Communications in relation to this Bill. The CBAA agrees that free-to-air broadcasting is special. It is the stable, free and ubiquitous platform that means people in both metropolitan areas and rural and regional Australia have access. The Government is committed to ensuring all Australians have access to free-to-air media services on an equitable basis.

VAST – simplify access

The Bill is primarily concerned with the Viewer Access Satellite Television (VAST). VAST is a taxpayer funded safety net which ensures that Australians in regional or remote communities without adequate terrestrial television can continue to access free-to-air television (and radio) via satellite. The Albanese Government has extended funding to continue VAST for an additional seven years to 2030-31.

The CBAA considers that all free-to-air radio and television broadcasting services carried on VAST and - in particular - those that receive taxpayer funding for that purpose, ought to be available to all Australians.

- Radio and television services of the National Broadcasters (ABC/SBS) are available to users across Australia without the need for special authorisation, and without the user needing to be in an area that is defined as 'service-deficient'.
- In exactly the same way, the services of any commercial broadcasters that receive taxpayer funding to be carried on VAST ought to be available to users of VAST without the need for special authorisation, and without the user needing to be in an area that is 'service-deficient'.

The judgment as to whether a user can access services, using a delivery system that has been funded by the taxpayer, should not require user authorisation other than for system updates, security or operational reasons, or a judgment by any (commercial or otherwise) free-to-air broadcaster as to the user's preferred method of delivery of that service.

If a user in any location wishes to access any free-to-air broadcast media service by way of VAST then that should be for the user to decide, and the access be kept simple, ubiquitous and automatic.

Remove need to specify service-deficient areas

Ideally, we would like to see the Bill amended accordingly, by removal of the need for 'service-deficient' areas, or, at least, a commitment to simplify access for users by declaring that - for the purposes of VAST - all services that are licensed as free-to-air broadcasters are in 'service-deficient' areas.

With this change, situations such as have arisen in Mildura would require no further action for users to be able to access all free-to-air broadcast services carried on VAST.

Impact on Indigenous media and communities

As the peak body for community broadcasters, the CBAA works alongside the First Nations Indigenous media sector, and access is of particular importance to communities that ought to be able to rely on VAST.

Any measure that reduces barriers to access is important and meaningful.

The current setup of VAST reception equipment requires some free-to-air services before use, site-by-site. This is an impediment. It would be preferred if access to all free-to-air radio and television services was pre-authorized, so that service can be operational immediately after installation. There should be no need to make a case for approval to access any specific free-to-air service, whether by having to make a phone call or accessing the internet.

Simplifying access to VAST in this way is an issue has been raised in the context of the First Nations Digital Inclusion Roadmap.

All locations – regional, remote, metropolitan and adjacent

As well as regional and remote areas, an Australian living in a metropolitan area, or adjacent to a metropolitan area, should be able to access all services using the VAST platform. They could, except for the current administrative requirement to be identified as being in a 'service-deficient' area. The administrative requirement to be verified as being in a 'service-deficient' area should be removed.

Community radio and television

There are a number of free-to-air community and Indigenous radio services available on VAST. These services are vital to ensure all Australians have access to a wide diversity of media services on an equitable basis.

The Government has already taken steps to ensure the continued availability of free-to-air community television services, currently limited to terrestrial delivery in Melbourne and Adelaide.

The existing community television licensees wish to continue to provide terrestrial free-to-air broadcasting services, whether that be by way of their exclusive use of an existing digital terrestrial channel, or, by way of capacity reserved within a 'next-generation' terrestrial television system, if that were to be introduced in any or all areas of Australia. There is scope to explore addition of community radio services alongside, and as well as community television services.

The existing community television licensees are also exploring extending availability across other parts of Australia, including by way of the provision of a national coverage safety-net community television service on VAST.

The existing and vital support of Government for community radio and television broadcasting is acknowledged and appreciated. The presence of both community radio and television services across all of Australia would be enhanced by a Government commitment to further and ongoing support, and, as well, simplified access to VAST would be of assistance to users.

Other – consolidating transmitter licences

The CBAA supports the changes described in the Bill to enable consolidation of transmitter licences for certain broadcasting services, and in regard to the preparation of television licence area plans.

Sincerely,

Jon Bisset
Chief Executive Officer

About Community Broadcasting

Community broadcasters deliver over 500 AM/FM/DAB+ services and 2 dedicated TV services that reach over 4.93 million people across Australia each week – almost one quarter (24%) of Australians. The sector's social and economic impact is driven by 17,800 volunteers and almost 1000 employees generating \$1/4 billion in value.