



16 March 2006

The Secretary
Standing Committee on Communications,
Information Technology and the Arts
House of Representatives
Parliament House
CANBERRA ACT 2600

To whom it may Concern,

RE: COMMUNITY BROADCASTING INQUIRY

Thank you for the opportunity to respond to your inquiry into the valuable contribution that Community Radio plays in our society.

As a means of background information, 96five FM (Family Radio) is a capital city community radio station broadcasting from Brisbane. The station commenced its first test transmission in the early 1970's and was awarded a permanent FM license in October 2001. The license granted is to serve the needs of the Christian community.

Upon winning the long sought after permanent licence, 96five has experienced strong audience growth. The audience has grown from 79,000 weekly cumulative audience in 2002 (McNair Ingenuity Audience Research 2002) to 222,000 weekly cumulative audience in 2005 (McNair Ingenuity Audience Research 2005). This growth is a testament to the dedication and hard work of everyone involved in the operations of the radio station.

Below I have commented on the specific terms of reference that the inquiry will investigate on, sharing our experiences and insights. Please feel free to contact myself on 07 3217 5999 or manager@96five.com, should you have any comments or further questions regarding this submission.

Regards,

A handwritten signature in black ink that reads 'Jason Berry'.

Jason Berry
General Manager

COMMUNITY BROADCASTING INQUIRY: 96five FM

1. The scope and role of Australian community broadcasting across radio, television, the internet and other broadcasting technologies.

Community radio has witnessed phenomenal growth over the past 20 years. From our own experience it was the dedication of volunteers who sacrificed paid employment and worked tirelessly for the cause of the station, believing that one day their efforts would be rewarded with a permanent FM community license. Today, our radio service has grown to become a significant source of encouragement, entertainment and a real asset to the community in which we broadcast.

The principal role of a community radio station is to provide a service and cater for a community of interest that is not being served by the commercial sector. In our setting, 96five is meeting the needs of the Christian community, an organized community of people representing 8 – 12% of the nation who attend a Christian Church service each week. As a predominately music station, 96five provides a format that is appealing to people who identify themselves as Christian (68% of the nation on the most recent ABS census). Many of these people may choose not to attend a Christian Church, yet they still identify with Christian values and they listen to the station as they value the positive contribution the station makes to their lives and the community at large.

In summary the role of 96five is to provide a station that is meeting an un-met community need. Without 96five, there would be no radio station in Brisbane providing content for the Christian community and for people who identify with Christian values.

Beyond meeting an un-met need, the scope of community radio and in particular 96five is enormous and contributes to the community in numerous ways, such as:

- Volunteer opportunities: Community radio provides an opportunity for aspiring people to enter the dynamic world of media and provides volunteer opportunities in all areas from administration, sales, programming, production, promotions, fundraising and announcing. Without community radio, members of the community would be starved of this opportunity as commercial radio offers limited opportunities for volunteers.**
- Career Opportunities: Over the years, 96five has trained many people who are interested in a career in broadcasting. We currently employ 24 staff. A number of our on –air volunteers have gone onto paid employment in the station and/or have moved onto careers in commercial radio.**
- Training: 96five runs its own radio school, a 20 week course giving people the essential foundations necessary to broadcast a live program on radio. The course has been running for over 7 years and has given numerous people the opportunity to be involved and participate in a radio station. Many graduates of our school have found immediate employment in commercial radio.**

- **Community access:** 96five is 'owned' by its members, the station is not controlled by shareholders looking for financial dividends. As a member driven station, it is the community who have access to the station and can contribute comments on the direction of the station, the programming and the standard of such.
- **Local content:** 96five give access and air time to countless community groups that simply would not have access to the air waves on commercial radio. The station also supports local music and promotes the initiatives and activities of local community groups, through community service announcement and low priced sponsorship announcements. Four major international Christian recording artist and bands had their careers kick started by opportunities provided by our station.

To truly understand the scope and value that 96five plays in our community, you only have to imagine what it would be like if the station didn't exist....

- No volunteer opportunities for people who are interested in radio
- No career opportunities for people looking to combine their skills in radio with their personal faith.
- No training and development of people in support careers that are aligned to Christian broadcasting
- There would be limited or no voice on radio for the Christian community, those sympathetic with Christian values and "Not for Profit" Christian and other community organizations.
- There would be limited or no airplay for contemporary Christian music and no investment in up and coming songwriters, performers and bands, that identify with the Christian message and ethics
- Interestingly in America, contemporary Christian music is one of the fastest growing sectors of music, out selling country music. If 96five didn't exist, this genre would not receive airplay in our part of the world.
 - Christian radio in the United States has also been identified as the rising program provider of choice in the wider community.

The internet plays a vital role in the operations of 96five. We have used the internet to develop a online community of 96five listeners who interact with the station and each other. The stations website provides an opportunity for listeners to register (for free) community events on the stations calendar. The website also provides links and addresses of local Churches and other groups who the station partners with

To gain an understanding of the valuable role of the website to the 96five, one just needs to look at the web traffic monthly results. 96five's website at www.96five.com averages over 1,000,000 hits per month and anywhere from 15,000 to 25,000 sessions per month. Clearly listeners

are interacting regularly with the website and see it as an essential element of the station.

The internet also provides the station with the opportunity to stream our programs live; this has proven very popular with station listeners. Web streaming has become a significant spin-off service of the station, with in excess of 400 user "listeners" at any given time taking this service online. Many have been identified as out of service area and overseas ex-patriots who have come to value the stations unique programming "attitude" and content, not found on commercial services. Other local listeners, find this a more convenient way of accessing our programming during their working day.

With improvements to this service and promotion of it, we believe this number will double or triple in the near future.

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2. Content and programming requirements that reflect the character of Australia and its cultural diversity.

96five provides content that is relevant to our community of interest, namely the Christian community. The station provides a music format that is a mix of contemporary Christian music and positive mainstream or secular music. Rather than playing a 100% Christian format, the station aims to appeal to people who are looking for a 'positive alternative'. These are the people who may identify themselves as Christian but do not attend or rarely attend a Christian Church.

One of the strongest feedback comments that the station receives regularly from listeners is that people love the fact that 96five is different to commercial radio. A common quote from listeners is "I love the station, because I can leave it on and not have to worry about the kids hearing music or announcers which are offensive or rude". 96five doesn't play music which is offensive in lyrical content or theme, and our announcers do not swear or put people down. The 'positiveness' of the station means that the station is accessible to a large demographic of people, particularly families who are looking for content that is relevant, entertaining, yet safe. 96five provides that alternative.

Community radio stations like 96five, allow for a diverse programming content, unlike the often tight formatics of commercial radio. 96five while predominately a music station also provides a mixture of talk programs, interviews and different genres of music that appeal to a wide market. As mentioned above in section 1, without 96five there would be limited exposure and air play for Christian / family content on radio.

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3. Technological opportunities, including digital to expand community broadcasters networks.

There is no doubt that one of the biggest opportunities and threats to community broadcasters will be the roll out of digital radio. Clearly from our perspective, digital radio could present the opportunity for 96five to provide similar programming in a new media as well as potential multiple format streams of content that would better meet the diverse needs of the Christian community.

It is our understanding that current permanent licensed community radio stations will be offered 128 kb/s data stream, as for commercial radio. However this is only our assumption and we are unclear on the final allocation of data stream bandwidth to community radio.

The recent statement in the DCITA media release “Framework_for_the_introduction_of_digital_radio” which states “Jointly, wide-coverage community broadcasters in any market will have access rights to 128 kbps per analogue service (up to a maximum of 256 kbps per available multiplex) on the basis that they collectively determine how this is to be shared” has left community broadcasters uncertain of the intent of this statement.

Due to the different wording to the guidelines for commercial radio in the media release, there is concern in the community radio sector that they will be dis-advantaged with respect to the commercial services. The concern is based on much speculation that a different set of rules may be implemented for community operators and may lead to the knobbling of our ability to deliver digital services with the same technical integrity as the commercials. Listeners expect parity of quality as in the case of services on the FM broadcast band. A different approach in the new digital medium would generate adverse reaction from our listeners.

This is a major concern, especially when 96five seeks to maintain high professional standards in all areas of operations, as is demanded by our listeners and members. A reduction in this quality in parallel media would be a major setback in maintaining that integrity of service to all takers.

We would be concerned also if in the rollout of digital bandwidth, all community radio stations were ‘lumped’ together. The most difficult and unprofitable outcome would be 96five having to share channels with another station, whereby listeners may have Christian content playing in the morning, followed by ethnic broadcasting on the same channel in the afternoon. From our perspective it is critical that the rollout of digital radio does not exclude or minimize the available channel bandwidth given to community radio. If anything with the growth in

stations like 96five, community radio should be given at least the same availability to bandwidth as commercial radio if not more. Currently our audience is of the order of 222,000 people per week (McNair Ingenuity Audience Research 2005), and if 96five were excluded or offered limited digital spectrum, our main concern would be that the station would no longer be able to adequately service our community of interest in this new and emerging parallel and superceding medium.

A more positive outlook recognizes that digital enables a more flexible delivery medium. Currently we only have the one FM frequency, and our content is limited, in that we are aim to meet the needs of the entire Christian community on the one channel providing suitable programming to satisfy youth through to families, and the mature aged.

In the case of digital broadcasting, with the possibility of multiple streams of programming ,the e station could offer different streams covering more specialized programming including:

- Youth programming;
- Christian teaching and worship programming;
- Family programming; and
- Mature aged listener format.

When you consider that with just one FM frequency we currently endeavour to meet the needs of 222,000 people weekly then the opportunity of utilizing multiple digital channels would be to satisfy and better serve the more diverse sub-sections of audience in our community of interest through additional and more specialized content.

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4. Opportunities and threats to achieving a diverse and robust community of broadcasters.

As a station we are concerned about commercial radio's attitudes to community radio. From our experience commercial radio are happy for community radio to exist, providing they do not impact the community in any obvious way. As soon as a station strives for excellence in programming, sponsorship and marketing, to better serve the demand of their community of interest, and to produce a positive result for their community of interest, it would appear that such stations can then become a "target" for commercial radio entities who do not wish to see any impact on their market share or financial revenue from that same market.

I have heard this comment repeated by other community radio and television stations. 96five does not exist to compete with commercial radio. We do, however, exist to provide the highest quality service to our community of interest. Our listeners (many of whom donate significantly to the station) expect excellence in our broadcasting service, in regard our programming and presentation.

The core issue is that we are providing quality services that the commercial stations do not understand or are interested in, but these are of significance to the community of interest and wider community, which in turn generates interest .

We cannot see the value in having to tag every sponsorship announcement with "station sponsor" or "our sponsor" to avoid breaching our licence conditions. Our audience knows we depend on financial support from sponsors and that we run sponsor announcements to obtain financial support for the station. It goes without saying. The tag serves no purpose and is both a significant compliance burden, and represents a significant risk to our licence if we inadvertently omit the tag. In our view, the requirement to tag should be repealed and community radio should be permitted to broadcast advertisements, within the limitation of the existing 5 minutes-per-hour rule.

Another threat to a community radio station is the inconsistencies in the ACMA guidelines regarding sponsorship announcements and support given to the community of interest. We would be strongly recommending a review of the sponsorship guidelines and would welcome the opportunity to submit a paper on recommendations for changes to the sponsorship guidelines. It would greatly assist community radio if the ACMA were empowered to issue binding rulings and exemptions about specific sponsorship or advertising issues. That would give more regulatory certainty.

This would alleviate the sense of being continually “hamstrung” by “grey areas of regulation.

It is very difficult to operate in a situation where the rules for program presentation for commercial and community broadcasters are completely different and appear to be enforced with a different value system, and completely different code of ethics. This generates a “stilted” “incomplete” or “substandard” presentation of what would be considered appropriate information in a number of our programs .

In one instance, we were prevented from mentioning to our community of interest about a play , made by a “Not for Profit” organization, whose target audience was effectively our listeners. Our listeners would have valued this information, but we were advised that such mentions would constitute an “advertisement”.

We are currently constrained in our ability to communicate many of these events, or even programs, particularly in the case of Not for Profit organizations who are unable to pay for such a mention, even though their activities are in support of and of great value to our community of interest.

As a sector (Australian Christian Broadcasters) is a well organized collective of stations across Australia. In future I see opportunities for networking of programs that would greatly improve the quality of community radio stations across Australia, particularly in rural areas. Again the laws relating to programming, networking and sponsorship would need to be reviewed.

96five like many other permanent, licensed, capital city, Christian stations, is experiencing strong listener growth and support from the community. The vital contribution the station continues to play in our community presents opportunities for our community to participate and enjoy a high quality radio station. The future rollout of digital radio as mentioned above needs to ensure stations like 96five are not excluded and the vital role the station plays in our community continues to thrive in the future.