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The Parliament of the Commonwealth of Australia

# Tuning in to Community Broadcasting

House of Representatives  
Standing Committee on Communications, Information Technology and the Arts

June 2007  
Canberra

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## Foreword

Community broadcasting is an opportunity to bring diversity to the media landscape in Australia. Community broadcasters transmit on valuable spectrum that could be otherwise hired out to commercial users. The public policy reasons for reserving spectrum for community broadcasting has more to do with the community the broadcasters serve rather than anything done in the station itself.

Success of community broadcasters can be measured by station ratings, financial liquidity and ability to plan for the replacement of equipment needed to broadcast in the modern environment without waiting on uncertain government funding. Like all media outlets independence in content and production is valued.

The focus of this inquiry has been to support this independence, promote diversity, and ensure success of community broadcasters facing some big hurdles in transmitting into the future.

The Committee has made a number of recommendations addressing the need for increased Government funding to community broadcasters, both ongoing funding and short term funding for technical upgrades. However, these increases must be accompanied by a greater level of business acumen and improved management and financial accountability by community broadcasters.

While community radio is a vibrant sector, community television currently faces a crisis with no security of access to digital spectrum or option for simulcast. These issues were addressed in the first report of this inquiry released in February 2007 and the Committee, along with the community television broadcasters and viewers, anxiously await a Government response to that report.

I wish to thank all those who contributed to this inquiry and to both reports through submissions and discussions with the Committee.

I also wish to thank the members of the Committee and the Committee secretariat for their interest in the inquiry and commitment to working together to support the vitality of community broadcasting in Australia.

The Hon Jackie Kelly MP  
Chair







## Membership of the Committee

Chair            Hon Jackie Kelly MP

Deputy Chair   Ms Julie Owens MP

Members        Hon Bronwyn Bishop MP  
                    Mr Peter Garrett AM MP  
                    Mr Alan Griffin MP (until 25/5/06)  
                    Mr Michael Johnson MP  
                    Mr Michael Keenan MP

Mr Andrew Laming MP  
Mr Chris Hayes MP  
Mr Ken Ticehurst MP  
Ms Maria Vamvakinou MP  
(from 25/5/06)

## Committee Secretariat

Secretary	Dr Anna Dacre
Inquiry Secretary	Mr Anthony Overs
Research Officer	Mr John Baczynski
Administrative Officers	Mr Daniel Miletic
	Ms Shannon Rooney



## Terms of reference

The Committee will investigate and report on:

- the scope and role of Australian community broadcasting across radio, television, the internet and other broadcasting technologies
- content and programming requirements that reflect the character of Australia and its cultural diversity
- technological opportunities, including digital, to expand community broadcasting networks
- opportunities and threats to achieving a diverse and robust network of community broadcasters.





## List of abbreviations

ACB	Association of Christian Broadcasters
ACMA	Australian Communications and Media Authority
AFMN	Australian Fine Music Network
AICA	Australian Indigenous Communications Association
BSA	Broadcast Services Act
CAAMA	Central Australian Aboriginal Media Association
CBA	Community Broadcasting Association of Australia
CBD	Community Broadcasting Database
CBF	Community Broadcasting Foundation
CPI	Consumer Price Index
CTV	Community Television
DCITA	Department of Communications, Information Technology and the Arts
DIMA	Department of Immigration and Multicultural Affairs
EBC	Ethnic Broadcasters' Council
EPBAV	Ethnic Public Broadcasting Association of Victoria
FSG	Funding Strategy Group
GST	Goods and Services Tax

GVCR	Goulburn Valley Community Radio
IBP	Indigenous Broadcasting Program
IRCA	Indigenous Remote Communications Association
MCRA	Multicultural Community Radio Association
MRTAWA	Multicultural Radio And Television Association of WA
NEMBC	National Ethnic and Multicultural Broadcasters' Council
NIRS	National Indigenous Radio Service
NTN	National Transmission Network
PMBA	Progressive Music Broadcasting Association
RIBS	Remote Indigenous Broadcasting Services
RPH	Radio for the Print Handicapped
SEIMA	South East Indigenous Media Association
SYN	Student Youth Network
TCBL	Temporary Community Broadcasting Licences
TEABBA	Top End Aboriginal Bush Broadcasting Association



## List of recommendations

### 2 The community broadcasting sector and governance and funding issues

#### Recommendation 1

The Committee recommends that the Australian Government, in conjunction with the sector's peak bodies, develop a guiding template for the structure of station boards or management committees.

The template for a community broadcaster board or management committee should ideally include:

- local council representative(s)
- educational institution representative(s)
- chartered accountant
- local Chamber of Commerce or business council representative
- other people suitably trained or qualified for managing such a community business.

#### Recommendation 2

The Committee recommends that the Australian Government provide an additional \$500 000 per year for four years, for the development and delivery of training material for the sector that focuses on management training for the community broadcasting sector.

This funding should be effective from 2008-09 and should be in addition to the \$2.2 million over four years that the sector is currently utilising.

### Recommendation 3

The Committee recommends that the Australian Government, through the Australian Communications and Media Authority, require that compulsory accredited business management training is incorporated as a community broadcasting licence condition, as part of the licence renewal process.

### Recommendation 4

The Committee recommends that the Community Broadcasting Foundation reassess their criteria for funding disbursement, taking into account effective management, business planning and accountability to the communities those stations serve.

### Recommendation 5

The Committee recommends that the Australian Government increase the general community broadcasting category of core funding for the community broadcasting sector by \$10 million, with indexed annual increases.

This increase in funding is for the purpose of funding community broadcasting station manager positions.

This funding increase should be effective for the 2007-08 financial year.

The Committee also recommends that the Australian Government review this level of funding every three years to ensure it remains proportionate to sector growth.

### Recommendation 6

The Committee recommends that the Australian Government increase targeted funding for the community broadcasting sector to \$5 million, with indexed annual increases.

This funding increase should be effective for the 2007-08 financial year.

The Committee also recommends that targeted funding should continue for four years, from 2007-08.



#### Recommendation 7

The Committee recommends that the Australian Government ensure that regional and rural community broadcasting stations are not financially disadvantaged, compared to metropolitan stations, and receive support appropriate to the services they deliver, with regard to Australian Government grants disbursed by the Community Broadcasting Foundation.

#### Recommendation 8

The Committee recommends that the Australian Government annually report to Parliament the percentage of Australian Government advertising expenditure that it allocates to the community broadcasting sector, and justify nil returns.

### 4 Regulatory issues in the community broadcasting sector

#### Recommendation 9

The Committee recommends that the Australian Communications and Media Authority:

- substantially improve its transparency with regard to community broadcasting complaint handling and decision making processes
- improve communications with community broadcasting licensees
- develop and implement extension services that allow community broadcasters to access Australian Communications and Media Authority officers
- increase awareness of its processes through workshops and campaigns directed towards the community broadcasting sector.

#### Recommendation 10

The Committee recommends that the Australian Government, through the Australian Communications and Media Authority, clarify community broadcasting sponsorship guidelines and provide detailed explanatory material concerning broadcasters' responsibilities.

The Committee further recommends that the update of sponsorship guidelines should be completed by 30 June 2008.

### Recommendation 11

The Committee recommends that the Australian Communications and Media Authority:

- provide significant extension support to community broadcasting stations regarding sponsorship guidelines
- significantly increase its awareness raising workshops and campaigns in community broadcasting forums.

## 5 Other community broadcasting sector issues

### Recommendation 12

The Committee recommends that the Australian Government conduct an investigation examining:

- increases in transmission fees for not-for-profit community broadcasters
- the impact of transmission fee increases on community broadcasters
- ways to monitor and regulate transmission fee increases for community broadcasters
- the potential for transmission for community broadcasters to be made a Community Service Obligation
- transmission access issues for community broadcasters
- any competition issues concerning transmission.

### Recommendation 13

The Committee recommends that the Australian Government amend the *Copyright Act 1968*, extending the Section 47A statutory licence to enable community radio broadcasting licensees to broadcast sound material that is provided to those broadcasters by approved Radio for the Print Handicapped organisations.

#### Recommendation 14

The Committee recommends that the Australian Government amend the *Copyright Act 1968*, creating a new statutory licence to:

- enable Radio for the Print Handicapped service providers to stream material on the internet
- enable Radio for the Print Handicapped material to be made available by way of download from Radio for the Print Handicapped websites.

This new statutory licence should be available to:

- print disability or Radio for the Print Handicapped licensees
- community radio broadcasting licensees, but only for material for which the expanded Section 47A relates.



## Introduction

- 1.1 In 2005, the Standing Committee on Communications, Information Technology and the Arts conducted an inquiry into the uptake of digital television in Australia. The inquiry report was tabled in February 2006.
- 1.2 During this inquiry, the Committee became aware of the community television sector's plight to gain access to digital spectrum, as promised to the community broadcasting sector by the Australian Government.
- 1.3 In January 2006 the Committee resolved to conduct a wide-ranging inquiry into community broadcasting which would encompass the community television issues.
- 1.4 A first report for the inquiry was tabled on 12 February 2007. This report recommended that the Australian Government make arrangements for community television to gain access to digital spectrum and financially support the move to digital.
- 1.5 This second report examines the broader community broadcasting sector, encompassing issues such as funding, governance and regulation.

## **Background to the inquiry**

- 1.6 The Committee agreed on 19 January 2006 to conduct an inquiry into community broadcasting in Australia. The inquiry was referred by

Senator the Hon Helen Coonan, Australian Government Minister for Communications, Information Technology and the Arts.

- 1.7 The terms of reference for the inquiry called for the Committee to inquire into and report on:
  - the scope and role of Australian community broadcasting across radio, television, the internet and other broadcasting technologies
  - content and programming requirements that reflect the character of Australia and its cultural diversity
  - technological opportunities, including digital, to expand community broadcasting networks
  - opportunities and threats to achieving a diverse and robust network of community broadcasters.
- 1.8 The inquiry was advertised in *The Australian* on 28 and 31 January 2006 and the *Australian Financial Review* on 31 January 2006.
- 1.9 The Committee sought submissions from relevant Australian Government Departments and from state and territory governments. In addition, the Committee sought submissions from community broadcasting sector representative bodies, the many broadcasters in the sector, academics, media organisations and commercial and national broadcasters.
- 1.10 The Committee received 131 submissions and 20 supplementary submissions. These submissions are listed in Appendix A.
- 1.11 Submissions were received from many community radio and television stations, community broadcasting representative bodies, and content producers. In addition, a great number of individuals recorded their personal views and experiences in relation to community broadcasting.
- 1.12 The Committee received 11 exhibits to the inquiry, which were provided in addition to written submissions, either accepted during public hearings or sent to the Committee by other parties. These are listed in Appendix B.
- 1.13 The Committee held 13 public hearings across Australia in Canberra, Melbourne and Alice Springs. The Committee called 19 witnesses. These witnesses are listed in Appendix C.

- 1.14 The Committee carried out a number of inspections of community broadcasters in Melbourne and Alice Springs. A list of the inspections undertaken by the Committee is found in Appendix D.

## **Structure of the report**

- 1.15 Chapter 2 of the report provides a snapshot of the community broadcasting sector, considers governance issues for the sector and examines the major funding issues for the sector.
- 1.16 Chapter 3 outlines the state of the community broadcasting sector and includes sections on recent studies, programming and the significance of the sector in Australian media.
- 1.17 Chapter 4 examines the significant regulation issues for the sector including sponsorship regulations and guidelines and the regulator's decision making processes.
- 1.18 Chapter 5 considers a number of other issues for the sector including the move to digital, the use of new technologies and increases in transmission fees.
- 1.19 Chapter 6 provides a conclusion to the report and the inquiry.





## The community broadcasting sector and governance and funding issues

- 2.1 This chapter examines governance and key funding issues for the community broadcasting sector.

### A snapshot of the sector

- 2.2 The following section provides descriptive data on the sector, with information on the number, category and spread of stations. The section also discusses how the sector is funded.

#### Number of stations

- 2.3 As at December 2006, there was a total of 358 current community radio broadcasting licences in Australia.<sup>1</sup>
- 2.4 There were also approximately 80 remote Indigenous broadcasters.<sup>2</sup>
- 2.5 There are also 36 current temporary community broadcasting licences (TCBLs). Nine TCBLs operate in NSW, two in the Northern Territory, nine in Queensland, three in South Australia, one in Tasmania, six in Victoria and seven in Western Australia.<sup>3</sup>
- 2.6 The Australian Communications and Media Authority (ACMA) allocated permanent community television (CTV) licences for the Sydney, Perth,

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1 ACMA, *submission no. 115*, p. 6; <[www.acma.gov.au/webwr/\\_assets/main/lib100052/lic031\\_community\\_radio\\_broadcasting\\_licences.pdf](http://www.acma.gov.au/webwr/_assets/main/lib100052/lic031_community_radio_broadcasting_licences.pdf)>, accessed 30 May 2007.

2 CBAA, *submission no. 61*, p. 2; CBF, *submission no. 114*, p. 12.

3 ACMA, *submission no. 115*, p. 6.

Melbourne and Brisbane licence areas between December 2003 and July 2004. CTV trial services currently operate in Adelaide, Lismore and Mt Gambier.<sup>4</sup>

## Station breakdown

2.7 The Community Broadcasting Association of Australia (CBAA) discussed the different types of community broadcaster:

... fifty three per cent of long-term licensed stations serve an array of different communities of interest, including: people from Indigenous and Ethnic backgrounds; those who have a print disability; religious communities; young people or those over 50; people who have a particular interest in the arts or classical music; and in one instance the gay, lesbian or transgender community.<sup>5</sup>

2.8 CBAA added:

... 47 per cent of current long-term licensed stations serve the many and varied interests of a defined geographical community – such ‘generalist’ broadcasters typically provide a music format incorporating popular and specialist styles, access to airtime for a wide variety of community groups and some specialist services relevant to their service area and its particular demographics (e.g. local news & current affairs, local arts, Ethnic, Indigenous or RPH [Radio for the Print Handicapped] programming).<sup>6</sup>

2.9 More than 60 per cent of fully-licensed stations are located in rural, regional and remote communities, making community broadcasting the voice of regional Australia.<sup>7</sup>

2.10 Categories that are consistently used to group and compare radio station data include:

- Rural
- Regional
- Metropolitan
- Suburban.<sup>8</sup>

2.11 The Community Broadcasting Foundation (CBF) provided maps prepared by the Department of Communications, Information Technology and the

4 ACMA, *submission no. 115*, p. 8.

5 CBAA, *submission no. 61*, p. 8.

6 CBAA, *submission no. 61*, pp. 8-9.

7 CBAA, *submission no. 61*, p. 9.

8 CBF, *submission no. 114*, p. 11.

Arts (DCITA), that indicate the location of community broadcasters across Australia.<sup>9</sup>

- 2.12 CBAA explained that the characteristics of stations can vary according to which community they serve:

Location can also be a determining factor in how stations operate. There are stations all over the country, some with metropolitan wide licences (20%), others which service particular areas of a city that hold sub-metro or suburban licences (16%), and those in regional (36%) and rural (28%) areas. The common factor is that every station is owned and operated by the community it serves, providing much-needed community-control and diversity of ownership to the airwaves.<sup>10</sup>

- 2.13 ACMA publishes a list of licensed radio stations which provides information about the number of fully licensed community radio stations together with the station format and location.<sup>11</sup> The ACMA list of licensed stations provides 21 distinct categories of radio station. The ACMA categories can be mapped to nine radio station sub-sector categories that are used by CBF and other studies of the sector. The categories are listed in Table 2.1 below.

- 2.14 Table 2.2 provides a breakdown of the number of community radio stations by state and broadcasting category.

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9 CBF, *submission no. 114a, submission no. 114b, submission no. 114c, submission no. 114d, submission no. 114e*.

10 CBAA, *submission no. 61*, p. 9.

11 <[www.acma.gov.au/acmainterwr/\\_assets/main/lib100052/lic007\\_community\\_of\\_interest.pdf](http://www.acma.gov.au/acmainterwr/_assets/main/lib100052/lic007_community_of_interest.pdf)>, accessed 11 May 2007.

Table 2.1 ACMA Radio Station Categories and Equivalent Station Sub-Sector Category

ACMA Categories	Equivalent Sub-sector Category
Ethnic - General	Ethnic
Ethnic - Portuguese	Ethnic
Music - Fine Music	Fine Music
Arts	General
Music - Progressive	General
General Geographic Area	General
Gay & Lesbian	General
Aboriginal	Indigenous
Torres Strait Islanders	Indigenous
Country & Sport	Other
Educational	Other
Educational / Specialised M	Other
Community Access	Other
Religious - Christian	Religious
Religious-Islamic	Religious
Print Handicapped	RPH
Mature Age	Seniors
Organisations serving 50+ years	Seniors
Senior Citizens	Seniors
Youth	Youth
Youth and Students	Youth

Source <[www.acma.gov.au/acmainterwr/\\_assets/main/lib100052/lic007\\_community\\_of\\_interest.pdf](http://www.acma.gov.au/acmainterwr/_assets/main/lib100052/lic007_community_of_interest.pdf)>

Table 2.2 Number of community radio stations by state and broadcasting category

State	Number of stations							
	Ethnic	Indigenous	RPH	General/ Other	Youth	Seniors	Fine Music	Religious
ACT	1		1	3				1
NSW	1	3	2	72	3	3	1	12
NT		36		3				1
QLD	1	36	1	27	2	2	1	10
SA	1	4	1	19	1		1	2
TAS			1	8	1			2
VIC	1	1	5	40	1	2	1	4
WA	2	19	1	11	1			3
VIC-NSW				1				
Ext. Terr.				1				
Total	7	99	12	185	9	7	4	35

Source <[www.acma.gov.au/webwr/\\_assets/main/lib100052/lic007\\_community\\_of\\_interest.pdf](http://www.acma.gov.au/webwr/_assets/main/lib100052/lic007_community_of_interest.pdf)>

## How the sector is funded

- 2.15 Community radio stations earn income through a variety of sources, including sponsorship, donations, listener subscriptions, government grants, fundraising activities and user access fees.<sup>12</sup>
- 2.16 CBAA stated:
- The community broadcasting sector operates on extremely modest financial resources ... community radio stations operate on tight budgets, with income generally meeting expenditure.<sup>13</sup>
- 2.17 CBF stated that Australian Government funding is provided for:
- ... local Ethnic, Indigenous, and RPH program production; national program production, distribution and exchange; station infrastructure and operational support; training; national infrastructure development projects; sector coordination and research.<sup>14</sup>
- 2.18 CBF explained that Australian Government support for community broadcasting is currently made up of several elements:
- Core funding for general, Indigenous, RPH and Ethnic community radio broadcasting
  - Targeted funding for:
    - ⇒ Ethnic community radio broadcasting
    - ⇒ Infrastructure investment including:
      - ⇒ satellite uplink charges for the Community Radio Satellite
      - ⇒ Information and Communication Technology initiatives and online resources for the benefit of the community radio sector
  - Other funding (funding not identified as Core or Targeted and in some years including specific project funding) for:
    - ⇒ Transmission-related operational and infrastructure cost
    - ⇒ National accredited Training Program.<sup>15</sup>

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12 CBAA, *submission no. 61*, p. 9.

13 CBAA, *submission no. 61*, p. 9.

14 CBF, *submission no. 114*, p. 4.

15 CBF, *submission no. 114*, p. 15.

2.19 CBAA provided a breakdown of aggregate community radio station income for 2003-2004:

■ Sponsorship	35.29%
■ Income Other (incl ATSIC grants)	20.59%
■ Donations	10.34%
■ Subscriptions	7.74%
■ CBF Grants	6.43%
■ Access Fees	5.51%
■ Fundraising	4.09%
■ Education	2.78%
■ Grants - State	2.77%
■ Grants - Fed	2.75%
■ Prod. / Studio Fees	0.60%
■ Training Fees	0.46%
■ Philanthropic	0.44%
■ Grants - Local	0.23% <sup>16</sup>

2.20 Not all broadcasters are equally funded, with some receiving a larger proportion of grants than other stations, and some stations relying a larger proportion of sponsorship income.

2.21 CBF indicated that station income is considerably variable between categories of stations and between regional and metropolitan stations. A table providing an analysis of community radio income and expenditure for 2002-03 can be found in Appendix E.

2.22 CBF believes:

... the sector is poorly resourced and as a result is not realising its full potential to contribute to Australian society. Inadequate operational funds and poor infrastructure limit the effective operation of many community broadcasting stations. This general paucity of resources is a major threat to the achievement of diverse and robust network of community broadcasters.<sup>17</sup>

<sup>16</sup> CBAA, *submission no. 61*, pp. 9-10.

<sup>17</sup> CBF, *submission no. 114*, p. 11.

## Governance issues in the community broadcasting sector

- 2.23 This section examines the major governance issues affecting the community broadcasting sector.
- 2.24 The section examines how community broadcasters manage their stations, and offers possible options for better management and governance.
- 2.25 There were several examples of good governance in the submissions to the inquiry. However, there was little emphasis on management training, and few sound examples of forward planning or business planning. The need for a high level of accountancy or management skills was not emphasised. Issues such as the need for defamation insurance were raised.

## Staffing

- 2.26 Several submissions to the inquiry suggested that the employment of a paid station manager, and indeed additional paid staff, was of great benefit to the station. Other submissions claimed that stations ran effectively with only volunteer staff.
- 2.27 Many submissions stated that their community radio stations were operated by volunteers and had no paid staff.<sup>18</sup>
- 2.28 Progressive Music Broadcasting Association (PMBA), Three D Radio in Adelaide explained how it operates:

PMBA [is a] progressive organisation which holds dear the ideals of democracy, equality and access. It is fiercely independent ... the association is operated entirely by the volunteer members of the PMBA. There are no paid staff or agents on commission. Whilst this is not uncommon for small rural community broadcasters, it is unique for a major metropolitan broadcaster. Since 2001 we have chosen to operate this way to ensure we maintain our independence and remain true to the founding ideals of the PMBA.<sup>19</sup>

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18 Port Stephens FM, *submission no. 88*, p. 2; Bayside Community Radio Association, *submission no. 11*, p. 1; 8CCC, *submission no. 117*, p. 7; Deepwater & District Community FM, *submission no. 124*, p. 2; Radio East Gippsland, *submission no. 29*, p. 2; 3WAY FM, *submission no. 30*, p. 1; Bay & Basin FM, *submission no. 38*, p. 1; UGCR, *submission no. 44*, p. 2; Narrabri Shire Community Radio, *submission no. 48*, p. 1; Yarra Valley FM, *submission no. 55*, p. 1; Gippsland FM, *submission no. 76*, p. 3; Alex FM, *submission no. 8*, p. 1; Radio EMFM, *submission no. 85*, p. 1;

19 PMBA, *submission no. 121*, pp. 1-2.

2.29 CBAA stated that:

Forty-five per cent of stations do not have any paid staff, a situation which makes it very difficult for stations to concentrate on fundraising and development activities.<sup>20</sup>

2.30 Some stations have no paid staff to manage operations, however they do retain sponsorship staff on commission.<sup>21</sup>

2.31 Some stations pay for specialist services. For example, Yarra Valley FM stated that it paid contractors from time to time for maintenance and specialised tasks.<sup>22</sup>

2.32 Some stations have a paid manager or a small number of staff. For example:

- Eastside Radio has two paid staff, a station manager and a station administrator<sup>23</sup>
- Goulburn Valley Community Radio (GVCR) has six paid staff<sup>24</sup>
- 4MBS has four full time and three part time staff<sup>25</sup>
- 3CR has three full-time and three part-time staff.<sup>26</sup>

2.33 Some of the more established and well-resourced metropolitan stations have a larger number of staff. For example:

- 3RRR stated it had a yearly salary bill of around \$550 000, paying 12 full time and three part-time staff<sup>27</sup>
- 2SER has 10 full-time and part time permanent staff and three contracted positions.<sup>28</sup>

2.34 Association of Christian Broadcasters (ACB) stated that 33 full time Christian radio stations employed 219 staff, representing 25.1 per cent of all staff employed in the community radio sector.<sup>29</sup>

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20 CBAA, *submission no. 61*, p. 10.

21 4CCC Rainbow FM, *submission no. 18*, p. 2; Yarra Valley FM, *submission no. 55*, p. 1;

22 Yarra Valley FM, *submission no. 55*, p. 1.

23 Eastside Radio, *submission no. 9*, p. 1.

24 GVCR, *submission no. 97.1*, p. 2.

25 4MBS, *submission no. 84*, p. 2.

26 3CR, *submission no. 26*, p. 5.

27 3RRR, *transcript of evidence 24 May 2006*, p. 9.

28 2SER, *submission no. 118*, p. 3.

29 ACB, *submission no. 106*, pp. 5-6.



- 2.35 Noosa Community Radio explained its staffing situation and the need for better management:

We are predominantly a volunteer organization, with our sponsorship reps (2), being paid a small commission, however, they also engage in various volunteer aspects of the station. More recently, we have engaged a paid bookkeeper, recognising this role as an integral part of the operations of the station. As a result of closer monitoring of operations, we have identified the necessity for the position of a paid station manager in the coming months, to manage operations on a day to day basis, with some consistency and efficiency.<sup>30</sup>

- 2.36 Australian Fine Music Network (AFMN) discussed the conditions for community broadcasting station staff:

Paid EFT staffing levels are considerably less than those most radio stations would consider to be essential, and as a result, the potential of community stations to better serve their audiences is often hindered. Staff in these situation are often highly stressed, work long hours with strategic focus taking a back seat. The exploitation of staff in this way would not normally be tolerated in commercial media.<sup>31</sup>

- 2.37 Melbourne's 3RRR also discussed poor working conditions for staff:

The sector is enormously under skilled; 50 per cent are volunteers and there is hardly any decent management in the sector. There is very little career path – those that are paid are paid incredibly small salaries and work incredibly hard.<sup>32</sup>

## The need for better governance

- 2.38 Western Radio Broadcasters discussed how a community broadcaster should be managed:

We are now in a broadcast area that is very expensive. We never seem to buy a piece of equipment that has a price tag on it under \$10,000. So stations need to know where they are headed. They need to have reserves of money. When a piece of equipment falls over, it has to be replaced. I think the terminology I used was that we can no longer survive on lamington drives and chook raffles.

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30 Noosa Community Radio, *submission no. 73*, pp. 2-3.

31 AFMN, *submission no. 40*, p. 6.

32 3RRR, *transcript of evidence 24 May 2006*, p. 9.

We have gone past that. We need effective management at that level within the station. We need the budget set. We need to monitor it very closely, just as any small business does.<sup>33</sup>

2.39 Western Radio Broadcasters elaborated on the view of managing the station as a business:

We are a not-for-profit, volunteer-driven organisation, but we are a business after all. If we do not know where we are heading or we move into an area where possibly we do not have the funds and cannot pay the rent or something else, I believe that we are trading whilst insolvent. On any given day we should be able to close our books and know that we can pay what we owe in the marketplace and that we are well and truly swimming and not sinking. I think this is something that will only come about with management within stations.<sup>34</sup>

2.40 Western Radio Broadcasters added:

It is hard at small stations. We are a sub-metro station. We are not a Melbourne metropolitan station. We do not have all of the power in the world to generate from our transmitter site. We have the access to the airwaves and we have to do something with it, and we have to run a business at the end of the day. There needs to be somebody there answering that phone, taking those calls from prospective sponsors who want to get involved with the station or whatever and then on selling that. That is the way it has to be. It is about effective control and it is about nurturing the volunteers who are moving in and out of the studios ...<sup>35</sup>

2.41 GVCR also discussed good governance:

We are running a community based business as such a proper governance structure is required ... proper governance is essential for all business and in particular community based businesses.<sup>36</sup>

2.42 GVCR recognised that operating a community broadcasting station is a business and sought to improve the station's operations:

... I felt I could use some help to improve the business side of the operation, and found the Small Business Counselling Service (SBCS) via the Victorian Business Centre in Shepparton ... the

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33 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 57.

34 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 57.

35 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 57.

36 GVCR, *submission no. 97*, p. 2; GVCR, *submission no. 97.1*, p. 3.

SBCS is a non-government, non-profit organization of volunteer expert counsellors who give their time and experience to help small businesses.<sup>37</sup>

- 2.43 GVCR discussed how station operations had improved after counselling sessions:

We have an improved capacity for orderly and planned work based on business priorities, and streamlined financial and sales reporting procedures minimise 'surprises' to the Board ... as a result the work environment has become happier and less stressful. This means our team of dedicated professional voluntary workers can get on with what they do best.<sup>38</sup>

- 2.44 GVCR also discussed the value of operating the station as a business:

We are also able to constantly update equipment, which is now 'state of the art'. A building extension is underway, at a cost of \$40,000, to provide more office and equipment space. This is largely funded by a City of Greater Shepparton grant.<sup>39</sup>

- 2.45 GVCR added:

Without the [business counselling sessions] I'd still be 'fighting fires' on a day to day basis, especially with cash flow issues which leave little time or the unstressed frame of mind to focus on strategic management control of the business.<sup>40</sup>

- 2.46 GVCR explained that, through improved management controls and reporting, its board of management is also now more aware of governance issues. It stated that the station is now considered in the community to be a financially viable, vibrant community-based business.<sup>41</sup>

- 2.47 3RRR explained how having few resources can impact on a station's operations:

Having your back to the wall produces less effective community relationships, less effective management and a much less creative approach to finding resources.<sup>42</sup>

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37 GVCR, *submission no. 97.1*, pp. 1-2.

38 GVCR, *submission no. 97.1*, p. 3.

39 GVCR, *submission no. 97.1*, p. 3.

40 GVCR, *submission no. 97.1*, p. 3.

41 GVCR, *submission no. 97.1*, p. 3.

42 3RRR, *transcript of evidence 24 May 2006*, p. 14.

- 2.48 Some stations appear to be struggling in terms of resources and forward planning:

At present we have no computer based broadcasting facilities. Our transmission board is over 20 years old, we have no back up studio or training studio so all of our training is done on air. We currently have no back up power source and we have just purchased new antenna for our station as the current one was destroyed in a rain storm last year.<sup>43</sup>

- 2.49 Very few examples of business plans, strategic plans, financial plans or marketing plans were submitted to the inquiry.

- 2.50 The Central Australian Aboriginal Media Association (CAAMA) expressed its frustration at not being able to plan operations sufficiently, due to the nature of Australian Government funding:

The other issue is that we are only funded on an annual basis. We should be funded on a triennial basis. We all have to have business plans when we apply for this funding. What for? We can only do things one year at a time, because I cannot go and employ someone for a three-year contract when I am only getting funded for one year, and I cannot take the risk of employing people any longer than that.<sup>44</sup>

- 2.51 C31 Melbourne discussed the difficulties it currently faces in planning its operations, given the uncertainty that exists in the CTV sector:

The lack of clarity on policy makes it almost impossible to business plan. Stations, their members, audiences and community producers need to know for forward planning – particularly financial planning – what the situation with digital is going to be ... how do we possibly plan without that knowledge? ... as a volunteer of the chair of the board of Channel 31 Melbourne in Geelong, I am personally concerned that I and others cannot properly carry out our forward responsibilities, our legal responsibilities as directors, due to uncertainty in government policy in this area. We cannot do the planning that we are legally responsible for.<sup>45</sup>

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43 EMFM, *submission no. 85*, p. 4.

44 CAAMA, *transcript of evidence 21 July 2006*, p. 8.

45 C31 Melbourne, *transcript of evidence 20 July 2006*, pp. 4-5.

## Insurance

- 2.52 The issue of lack of insurance, particularly defamation insurance, was raised in several submissions to the inquiry.
- 2.53 GVCR claimed that only approximately 70 stations Australia wide have defamation insurance.<sup>46</sup>
- 2.54 Western Radio Broadcasters explained what it insures and discussed its responsibilities regarding insurance:
- All of the assets of Western Radio Broadcasters Inc are [fully] insured. Likewise public liability, volunteers insurance, defamation insurance, specified items insurance, temporary removal insurance are all in place and current, and will continue to be. It is a major responsibility for any Committee of Management to ensure that the assets of the Association are fully protected.<sup>47</sup>
- 2.55 Melbourne's 3ZZZ stated that its general, directors and defamation insurance expenditure for 2004-05 was 4.5 per cent of that year's budget.<sup>48</sup>
- 2.56 National Ethnic and Multicultural Broadcasters' Council (NEMBC) suggested that:
- ... stations ... are obliged to carry a number of insurances - general, Workcover, volunteer, travel, public liability and defamation. In metro access stations with an annual expenditure of \$500,000 this can amount to \$25,000.<sup>49</sup>
- 2.57 Western Radio Broadcasters elaborated on its views on defamation insurance:
- We do not have the legal resources or the experience at announcer level and, again, it is extremely difficulty to monitor and control 24 hours a day, seven days a week what is being said, especially at a station such as ours where we undertake approximately 56 hours of ethnic language programs per week. I believe that all community broadcasters should be required to carry current defamation insurance as a licence condition. Without this insurance they are leaving themselves wide open and, as far as I am concerned, if we never had defamation insurance I would

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46 GVCR, *submission no. 97*, p. 1.

47 Western Radio Broadcasters, *submission no. 21*, p. 2.

48 3ZZZ, *submission no. 105*, p. 17.

49 NEMBC, *submission no. 108*, p. 21.

make a recommendation to our committee of management to switch the transmitter off.<sup>50</sup>

- 2.58 GVCR suggested that defamation insurance should be compulsory, and that it should be a condition of license that public liability and defamation insurance is current.<sup>51</sup>

## Station managers

- 2.59 Several submissions discussed the benefits of having a paid station manager to manage the operations of a station.

- 2.60 Western Radio Broadcasters discussed management at the station level and the value of a station manager:

... although committees of management do a great job, they only have limited time to give to the station. Unless there is someone controlling the day-to-day activities and steering the ship, the original direction can be lost.<sup>52</sup>

- 2.61 The Top End Aboriginal Bush Broadcasting Association (TEABBA) expressed its frustration in finding and keeping appropriate people for particular jobs:

There are organisations that have had as many as three different staff changes in as many months, and you then have staff who look after the financial aspects of reporting, that themselves are not experienced in the complex matters of finance.<sup>53</sup>

- 2.62 Some submissions to the inquiry advocated the funding of management positions for community broadcasting stations.<sup>54</sup>

- 2.63 CBAA stated:

In our submission to government before the last election, we ... suggested that, if there was Commonwealth money available, there should be some sort of subsidy or pilot scheme for actually seeding employment of managers in stations.<sup>55</sup>

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50 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 55.

51 GVCR, *submission no. 97*, p. 1.

52 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 54-55.

53 TEABBA, *submission no. 60*, p. 10.

54 GVCR, *submission no. 97*, p. 2; 5TCB, *submission no. 104*, p. 4.

55 CBAA, *transcript of evidence 31 May 2006*, p. 4.

2.64 Bordertown's 5TCB suggested that:

... the Australian Government funds a leadership position, such as station manager, in at least every rural community broadcast station to ensure continuity, stability and productivity. The criteria to include governance, management training and key performance indicators.<sup>56</sup>

## Station boards and committees

2.65 The inquiry considered structure of station boards and committees of management as part of an examination of governance in community broadcasting.

2.66 Many submissions described their station's board or committee structure.<sup>57</sup>

2.67 Gippsland FM provided details on how its management works and its relationship with the community the station serves. The station's management regime consists of:

- Members of the Gippsland Community Radio Society Co-operative Limited elect the Board of Directors which is comprised of seven directors elected for two year terms on an annual rotation (four one year, three the next). Board roles include Chairperson, Secretary, Treasurer, Program Co-ordinator, Technical Co-ordinator, Marketing, etc. All Board meetings are open to all members and any other interested persons.
- Sub-committees also operate to assist the Board and provide a vehicle for participation in station policy development and decision-making. These are responsible to the Board for specific areas of station management and include the Program Committee, Marketing Committee and the Technical Support Group.<sup>58</sup>

2.68 Gippsland FM discussed a new committee:

A Community Advisory Committee is also now being established to ensure that the station has enhanced accountability to the community it serves. The role of this committee is to:

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56 5TCB, *submission no. 104*, p. 4.

57 Radio Northern Beaches, *submission no. 27a*, p. 2; C31 Melbourne, *submission no. 102*, p. 7; 3RRR, *submission no. 110*, p. 2; 2RPH, *submission no. 101*, p. 10; Yarra Valley FM, *submission no. 55*, p. 2;

58 Gippsland FM, *submission no. 76*, p. 1.

- represent the community at large (i.e. not just the current audience but the potential audience)
- assist in identifying community needs that Gippsland FM could cater for
- act as a reference point for evolving station objectives and aspirations.<sup>59</sup>

2.69 Gippsland FM further discussed the role of its Community Advisory Committee:

Such a committee would operate at 'arms length' from the station and be drawn from various sectors of the community; its participants would not be members of the station. At a practical level the committee will:

- provide commentary on station business plans and objectives
- identify needs in the local community which are not being met by current media
- identify areas where sectors of the community are under-represented in the media
- identify areas where the station could offer support to the skills development, self esteem or general well-being of community groups or individuals
- identify areas where the current station service could be improved to meet community needs.<sup>60</sup>

2.70 Gippsland FM believes the new committee will be:

... a key piece of governance infrastructure that will assist the station in remaining accountable to the community and reduce the risks of station management being hostage to the membership or sectors within it. A robust linkage to the community will ensure independent assessment of community needs and the role of the station in meeting those needs.<sup>61</sup>

2.71 Many successful community broadcasters were assisted, overseen by, or indeed created by educational institutions. Some broadcasters maintain those associations with educational institutions, which contribute to effective governance of the broadcaster.

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59 Gippsland FM, *submission no. 76*, p. 1.

60 Gippsland FM, *submission no. 76*, p. 1.

61 Gippsland FM, *submission no. 76*, p. 2.



2.72 Open Spectrum Australia (formerly the Community Spectrum Taskforce) stated:

The education sector has a long history of community broadcasting involvement. Since the community television trial commenced in the mid-1990s, tertiary institutions in Perth, Brisbane, Melbourne and Sydney have contributed programming, invested in infrastructure and facilities and participated in the governance of the stations.<sup>62</sup>

2.73 Melbourne's 3RR stated that it's board is made up of nominations from RMIT, the University of Melbourne and the station.<sup>63</sup>

2.74 When asked about the skill level of board members with regard to human resources management and financial transparency, 3RRR stated:

... in fact it has not always had strong skills in that area. They are academics and that does not always result in strong skills in business development, for example. It has had very consistent station management in terms of the general management roles.<sup>64</sup>

2.75 Mr Murray Peterson, a former community broadcaster with a number of stations, suggested that some committees have significant problems:

There is also an idea which is quite prevalent that boards or management committees have to be able to move motions without dissent rather than the board members expressing individual ideas consistent with the parts of the community they represent. There is also a reluctance to provide details of the board's deliberations to members and minutes of such meetings are usually recorded in a way which avoids revealing information.<sup>65</sup>

2.76 Mr Peterson suggested that:

Regulations requiring the management committee or board of community broadcasters to be more accountable to the members would achieve ... more diversity.<sup>66</sup>

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62 Open Spectrum Australia, *submission no. 56*, p. 7.

63 3RRR, *transcript of evidence 24 May 2006*, p. 10.

64 3RRR, *transcript of evidence 24 May 2006*, p. 11.

65 Murray Peterson, *submission no. 69*, p. 3.

66 Murray Peterson, *submission no. 69*, p. 3.

- 2.77 Ms Linda Campbell, a private individual, also suggested reforms for committees of management:

If they do not exist already, perhaps there needs to be ... regulations to make certain that members of any committees or boards pertaining to community broadcasting truly come from a cross-section of different interest groups - and that no one group dominates.<sup>67</sup>

- 2.78 ACMA described its regulatory processes concerning the examination of how a station operates and the subsequent licence renewal:

In the last two or three years we have seen the new renewal powers, which give ACMA a broad brief to review how each station is performing once every five years. We are seeing a rapid build-up of knowledge in the regulator about what a healthy and a less healthy community station looks like. We are seeing a periodic focusing inside the community sector on governance and how they are governing. It is not always one that they are happy about. Sometimes they are quite resentful or even a bit frightened ... the point is that we have not exercised those powers in a draconian way; we have exercised those powers in a way which has forced stations to do a lot of work on the way they are run. It has caused them to focus on how they are getting volunteers, how they are attracting members and how they are making their content accountable to the members.<sup>68</sup>

- 2.79 When asked if there are any particular training requirements in licence renewal, ACMA stated:

We have a wide power to impose conditions either on the sector, through standards, or on individual stations. We do make conditions. That is typically where we go to first when we encounter major problems with a station. We impose conditions which are directed to try and fix the problem.<sup>69</sup>

- 2.80 ACMA described a solution developed to address conflict resolution in stations:

An example where we have done something like this in the past is through the CBAA. We used to have a problem that hell hath no fury like a volunteer scorned. There are people who get booted off

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67 Linda Campbell, *submission no. 2*, p. 1.

68 ACMA, *transcript of evidence 29 November 2006*, p. 16.

69 ACMA, *transcript of evidence 29 November 2006*, p. 17.

running the so-and-so program who make it their life's mission to get it raised in the Senate; to get justice at last from that bully of a station chairman that took them off air all those years ago ... we worked out with the CBAA that a way of addressing this, which we hoped was both shrewd and cost-effective, was to require that stations have in place basic training around conflict resolution; that they have processes for mediating conflicts; and that they have certain policies and activities. We hoped to raise the quality of internal governance so that there were less angry refugees wandering around looking for justice.<sup>70</sup>

2.81 When asked if this process had worked, ACMA stated:

It has worked to an extent ... we have virtually turned off that work of endlessly working out who hit who first, but we are very clear and firm about ensuring that stations have those policies in place. If we find that they do not have them in place, we take steps to get them going. I think it has been a successful measure in terms of getting rid of those intractable inquiries which we are very poorly placed to get to the bottom of.<sup>71</sup>

2.82 ACMA further discussed the licence renewal process and examination of governance:

The renewals process that we were pleased to get has only been under way for a couple of years, and the big bulk of them are going to happen in the next 12 months or so. One of the things that has happened in that process is we have been able to pick up – more than we could in the past – where those sort of things are happening, where the governance is not right, and to negotiate with the station where they give undertakings to address a number of those things ... as a consequence of that renewal process, people have made undertakings regarding corporate governance, membership, how community representation happens ...<sup>72</sup>

2.83 When asked what mechanisms, such as having a chartered accountant on the board, would be recommended to stations, ACMA stated:

Typically, they would come back to us with a solution that they were going to improve the mail-out arrangements or the notification arrangements for annual general meetings or

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70 ACMA, *transcript of evidence 29 November 2006*, p. 17.

71 ACMA, *transcript of evidence 29 November 2006*, p. 17.

72 ACMA, *transcript of evidence 29 November 2006*, pp. 17-18.

whatever. If it was a question of financial accountability it may well be that they get a chartered accountant on their board. It would typically be that we would put to them what we saw as the problem and let them come back to us with their proposed solution ... most often if we find a problem we are going to address it through voluntary undertakings to do something to address it.<sup>73</sup>

2.84 ACMA added:

when we have had a complaint and impose conditions on somebody for not meeting their obligations, we will generally put reporting requirements into that condition so they have got to keep in touch with us on what is going on.<sup>74</sup>

2.85 ACMA stated that its analysis of a station's affairs is detailed, and also admitted that the licence renewal process was onerous for some stations:

We now have a very detailed form which invites them to tell us a lot about all the processes we would expect: what is their community purpose; what membership do they have; let us have a look at their constitution; let us have a look at their internal structure – their committees, their checks and balances, where they get their revenue, what their books look like ... that is what is onerous for the volunteers. Someone is going to have to fill out that form and what nearly always happens is that there is something incomplete, ambiguous or left blank and we go back to them. We come back in just about every case, and that is mainly for clarification. Every five years they are required to focus on how they comply with the obligations they are under to make use of that free channel they have, and that is what is onerous.<sup>75</sup>

2.86 ACMA conceded that the licence renewal process was new for everyone concerned, and stated that this is a learning process for it and all stations.<sup>76</sup>

2.87 It was suggested to ACMA that a template board or management committee structure could be developed for community broadcasters, which would include a local council representative, a chartered accountant, an educational institution representative, and other key qualified people. ACMA stated that it sees the development of templates

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73 ACMA, *transcript of evidence 29 November 2006*, p. 18.

74 ACMA, *transcript of evidence 29 November 2006*, pp. 20-21.

75 ACMA, *transcript of evidence 29 November 2006*, p. 19.

76 ACMA, *transcript of evidence 29 November 2006*, p. 19.

and good models as being much more the role of the industry association, the CBAA.<sup>77</sup>

2.88 ACMA added:

Because our rules are about outcomes we cannot say, 'And that means you have to have exactly this structure or this constitution to achieve the outcome.' We certainly can say, 'That seems a very odd or a very flawed way to achieve that outcome' or 'This seems to be a better way.' I think we have been keen to work with industry peak bodies on making sure there are models.<sup>78</sup>

2.89 When asked about establishing guidelines for boards and committees of management, DCITA stated:

It is really not our role. That is more to do with the codes of practice for how the station operates. I think that quite a lot of resources have been developed by the CBAA to help stations set up in an accountable way to meet the conditions that are established by ACMA ...<sup>79</sup>

2.90 ACMA was also concerned that any set structure may not serve one type of community broadcaster as well as other types of broadcasters

One of the reasons I am not sure that it would be an appropriate role for us is the actual type of arrangement you might have for radio for the print handicapped or ... Wagga, Gundagai community service may well be quite different, and the industry association can actually reflect that better in templates.<sup>80</sup>

2.91 ACMA suggested that it would welcome the development of set board structures by the sector, and that this is a very valuable role for CBAA to play, making the regulator's life a lot easier.<sup>81</sup>

2.92 ACMA may propose requirements for training to address particular problems at a station. It was suggested to ACMA that particular solutions, such as management training, could be made a condition of a station's licence. ACMA stated:

the Minister ... has got direction-making powers and could direct us in our renewals to give particular emphasis to training and their activities with regard to training.<sup>82</sup>

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77 ACMA, *transcript of evidence 29 November 2006*, p. 20.

78 ACMA, *transcript of evidence 29 November 2006*, p. 20.

79 DCITA, *transcript of evidence 1 November 2006*, p. 16.

80 ACMA, *transcript of evidence 29 November 2006*, p. 20.

81 ACMA, *transcript of evidence 29 November 2006*, p. 20.

2.93 ACMA added:

I suppose we see our renewals as one way of forcing them to focus on [governance], but we do not have any money to give them to help them. They have to find the time for their volunteers or their paid staff to do it. The sort of suggestions you are making I am sure would be welcome to the sector, but someone would have to pay for them; that is the issue. So someone would have to make the assessment of the cost and the benefit.<sup>83</sup>

2.94 ACMA explained that having particular conditions as part of a licence may be different for certain stations. ACMA provided an example:

I am just very mindful here that the sector consists of a lot of quite small organisations ... there is a community service on Kangaroo Island, which has got a population of 2,000, 3,000, 4,000 people ... the rule for them often ends up being a bit different from the rule for 2SER Sydney or 3MBS ... or Channel 31.<sup>84</sup>

## Management training

2.95 CBAA discussed the development of management training for the community broadcasting sector:

... our motivation for the CBAA and getting involved in coordinating national accredited training was to see the development for the first time of an accredited tier of management training. We think this is important. Most city stations already have managers, and the majority of community stations in suburban, sub-metropolitan and regional Australia do not have full-time, or most of them even part-time, managers – they are committee driven. We suggest that management training is an important first step.<sup>85</sup>

2.96 CBAA added:

The government recognised the need for the community broadcasting sector to have the resources to deliver nationally accredited training in broadcast skills and station management, particularly in rural and regional areas, and with consideration of

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82 ACMA, *transcript of evidence 29 November 2006*, p. 21.

83 ACMA, *transcript of evidence 29 November 2006*, p. 22.

84 ACMA, *transcript of evidence 29 November 2006*, pp. 21-22.

85 CBAA, *transcript of evidence 31 May 2006*, p. 4.

the special training needs of the RPH, Indigenous and Ethnic broadcasting sector.<sup>86</sup>

- 2.97 DCITA discussed the Australian Government's commitment to funding accredited management training, particularly for regional and rural areas:

... in the last election the government provided \$2.2 million for training over a 4-year period, which was commencing in 2004-05. Often what happens is that sometimes it has picked up something that the sector said. The sector had been saying in their submissions to government that they had identified as a priority management skills training particularly for stations in rural and regional areas. In fact in that policy the bulk of the funding for training places has to go to stations in regional and rural areas on the basis that that is what the sector identified as the need.<sup>87</sup>

- 2.98 CBAA explained that it is:

... managing the National Training Project in consultation with all sector organisations and Registered Training Organisations. The CBAA and the sector expects that the delivery of accredited training will lead to consistent standards in program content and improved operational viability across the community broadcasting sector.<sup>88</sup>

- 2.99 Some stations consider management training a priority. ACB explained its situation:

One of the things that we managed to do was to get some private funding for non-accredited training. In our sector we have a lot of people who are professional managers, professional CEOs, ex radio people, people who have made the choice to go into Christian broadcasting. We actually go around to stations and train them in management. We have been training in management, fundraising, governance and programming. Those are four areas that we concentrate on with our training and we try to help them all lift the bar.<sup>89</sup>

- 2.100 CBAA discussed the delivery of management and governance training to staff and volunteers in the community broadcasting sector. CBAA stated that the National Training Fund provided by the Australian Government

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86 CBAA, *submission no. 61*, p. 14.

87 DCITA, *transcript of evidence 1 November 2006*, p. 15.

88 CBAA, *submission no. 61*, p. 14.

89 ACB, *transcript of evidence 6 September 2006*, p. 13.

is currently the only source of funding available for management training purposes. CBAA added:

The \$2.2 million (over four years) which makes up the Fund is less than a quarter of what the sector requested to cover training initiatives.<sup>90</sup>

2.101 CBAA explained how the fund would be used:

... the Government specified when allocating the money that it must cover broadcast and management training and give priority to training that targets rural and regional broadcasters, as well as those from ethnic and Indigenous communities and those delivering programs to people who have print disabilities.<sup>91</sup>

2.102 CBAA provided details on the breakdown of funding:

... the Fund has to meet a number of needs ... over the period \$300k has been set aside specifically for management training delivery. A further estimated \$190k overall will be used for consultation and development of management training resources specifically for the sector.<sup>92</sup>

2.103 CBAA explained how many people would be likely to receive training:

... based on experience with delivery of broadcast and trainer training I estimate that no more than 350 people will be able to take part in short management or governance courses over the duration of the project. This is based on the assumption that each of those participants will only receive a partial qualification covering one or two topic areas out of 14 that will be offered overall (e.g. Financial Management, Revenue Raising, Volunteer and Staff Management, Strategic & Business Planning, Regulation and Compliance, Governance) ... if you take into account that there are approximately 350 stations in the sector and allow for five people from each station to receive some level of training (e.g. three office bearers from each board and two staff or volunteers managers), this amounts to around 1,750 people. As such, the training fund is likely to only partially meet the management training needs of about 20% of the sector.<sup>93</sup>

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90 CBAA, *submission no. 61.2*, p. 1.

91 CBAA, *submission no. 61.2*, p. 1.

92 CBAA, *submission no. 61.2*, p. 1.

93 CBAA, *submission no. 61.2*, p. 1.



## Community broadcasting sector funding issues

- 2.104 This section examines the major funding issues affecting the community broadcasting sector, particularly concerning Australian Government core funding and targeted funding.
- 2.105 The key issue of funding was raised by most submissions to the inquiry. Many stations are considered to be under-resourced and struggle to remain viable.

### Australian Government funding

- 2.106 Based on 2003-04 figures, sponsorship made up the bulk of community broadcasting sector funding (35.29 per cent). On aggregate, stations received 9.18 per cent of funding from CBF and Australian Government grants, and 2.77 per cent from State Governments.
- 2.107 CBF described funding for the community broadcasting sector:
- Throughout its history the community broadcasting sector has been largely self-financed, drawing support from the communities it serves via sponsorship, subscriptions, donations and general fundraising. Ongoing Australian Government support for community broadcasting has been channelled through the CBF since its establishment in 1984.<sup>94</sup>
- 2.108 CBF explained that additional funds go to parts of the sector:
- While the CBF is the main conduit for broad support to the sector, the Government also provides specific support for Indigenous broadcasting and for Radio for the Print Handicapped transmission facilities through other programs administered by DCITA.<sup>95</sup>
- 2.109 CBF also explained that funding support via the CBF has been limited to the community radio sector, with no general support provided for the maintenance and development of CTV.<sup>96</sup>
- 2.110 CBF stated that Australian Government support for the community broadcasting sector has grown from \$566 000 in 1984-85 to \$7.6 million in 2005-06.<sup>97</sup>

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94 CBF, *submission no. 114*, p. 14.

95 CBF, *submission no. 114*, p. 14.

96 CBF, *submission no. 114*, p. 14.

97 CBF, *submission no. 114*, p. 15.

- 2.111 CBF added that the community broadcasting sector has changed dramatically:

During this 22 year period the community broadcasting sector grew from a base of 54 largely metropolitan and regional radio stations into a diversified media sector with a large radio sub-sector, a remote Indigenous radio and television sub-sector and a relatively recent mainly metropolitan community television sector.<sup>98</sup>

- 2.112 CBF suggested that Australian Government support for community broadcasting development has been an extremely important catalyst in the development of community radio, however:

... Australian government support has always been modest and has not kept pace with sector growth and development needs. A substantial increase in Australian Government support levels is required to assist the community broadcasting sector to reach its full potential to contribute to Australian society.<sup>99</sup>

- 2.113 Melbourne's 3MBS discussed the Government's awareness of the value of community broadcasting and the sector's need for financial support:

It would be a further irony if the main threat to a robust network of community broadcasting was the lack of recognition and support of the sector by the federal government. It is still not evident, in terms of financial and strategic support, that the government is fully aware of the size, nature, diversity, the role played and the value provided by community broadcasting in Australia.<sup>100</sup>

### Australian Government commitment for the 2005-06 financial year

- 2.114 In 2005-06 the Australian Government provided the CBF with total funding of approximately \$7.6 million (excluding GST). This consisted of approximately:

- \$3.8 million for core funding
- \$1.7 million for targeted funding for ethnic community broadcasting and infrastructure projects
- \$1.6 million for transmission support grants

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98 CBF, *submission no. 114*, p. 15.

99 CBF, *submission no. 114*, p. 15.

100 3MBS, *submission no. 71*, p. 5.

- \$0.5 million for a training fund.<sup>101</sup>
- 2.115 DCITA provided a breakdown of that funding. Table 2.3 below describes funding allocated in the 2005-06 CBF Funding Agreement.
- 2.116 The Australian Government also provides \$13.3 million through direct grants to Indigenous broadcasting organisations under the Indigenous Broadcasting Program (IBP). DCITA stated:
- This funding was transferred from ATSIIS to DCITA in July 2004. The IBP provides funding support for Indigenous organisations that hold a community broadcasting licence under the Broadcasting Services Act 1992. It also contributes towards the ongoing operations of peak Indigenous media bodies, the satellite delivery of networked Indigenous radio programming, and some Indigenous radio content producers.<sup>102</sup>
- 2.117 DCITA also explained that, from time to time, the Australian Government provides funding for one-off projects:
- ... on 5 April 2004 the Minister announced \$2 million in funding to provide additional television transmitters at Remote Indigenous Broadcasting Services (RIBS) sites across remote Australia. This funding was provided to the CBF to administer the project.<sup>103</sup>
- 2.118 CBF discussed the categories of funding:
- Core funding is annual recurrent funding to which a measure of annual indexation is applied that partially offsets the effects of inflation.
  - Targeted funding is provided for a fixed period, usually four years, is also partially indexed and may be renewed by the Australian Government following a departmental review.
  - Other funding, not identified as Core or Targeted, is provided for a fixed period and is not indexed to offset the effects of inflation. It is expected that this last category of funding may be renewed following a similar process to Targeted Funding, but this remains to be clarified.<sup>104</sup>
- 2.119 CBF further explained:
- Core funding dates from funding arrangements prior to the institution of the Foundation; Targeted Funding was introduced in 1996-97 following the 1996 election of the Coalition to
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101 DCITA, *submission no. 75*, p. 5.

102 DCITA, *submission no. 75*, p. 5.

103 DCITA, *submission no. 75*, p. 5.

104 CBF, *submission no. 114*, p. 15.

Government; Other funding has been received for specific projects at various times and since 2004-05 includes funding for Transmission support and National training.<sup>105</sup>

2.120 CBF commented on the funding categories and their impact on the sector:

The CBF notes that the shift away from annual recurrent funding in favour of set-term funding cycles with no guarantee of renewal affects the sector's ability to formulate and implement long-term development strategies. For example in the current financial year, of the \$7.6m provided in Australian Government funding, just less than half - \$3.76m. is core funding which can be expected to continue; 22% or 1.69m. is in targeted funding in the last year of a four-year cycle ... and 28% or 2.65m. is other funding which is only committed through to 2007-08 and for which the renewal process (if any) is not clear.<sup>106</sup>

### 2006-07 financial year commitment

2.121 The Australian Government, in the May 2006 Federal Budget, renewed its Targeted Funding commitment to the sector:

The Australian Government will maintain targeted funding for community radio broadcasting by providing \$7.2 million over the next four years. This funding will be provided to the Community Broadcasting Foundation to enable it to continue to support ethnic community broadcasting, to fund information technology initiatives and to provide satellite services.<sup>107</sup>

2.122 DCITA provided a breakdown of funding for 2006-07. Table 2.3 below describes funding allocated in the 2006-07 CBF Funding Agreement.

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105 CBF, *submission no. 114*, p. 15.

106 CBF, *submission no. 114*, pp. 15-16.

107 <[www.minister.dcita.gov.au/media/media\\_releases/continued\\_commitment\\_to\\_communications\\_information\\_technology,\\_arts\\_and\\_sport2](http://www.minister.dcita.gov.au/media/media_releases/continued_commitment_to_communications_information_technology,_arts_and_sport2)>, accessed 23 March 2007.

Table 2.3 Australian Government funding for community broadcasting for 2005-06 and 2006-07

Area	2005-06	2006-07
<b>Core funding</b>		
General community broadcasting	\$1 251 152	\$1 280 640
Ethnic community radio broadcasting	\$1 552 550	\$1 589 139
Indigenous community radio broadcasting	\$655 254	\$670 722
Radio for the print handicapped	\$308 204	\$315 499
<b>Total core funding</b>	<b>\$3 767 160</b>	<b>\$3 856 000</b>
<b>Targeted funding</b>		
Ethnic community radio broadcasting	\$1 133 347	\$1 154 761
CBOOnline Project	\$509 837	\$519 482
Community Radio Satellite	\$56 656	\$57 757
<b>Total Targeted funding</b>	<b>\$1 699 840</b>	<b>\$1 732 000</b>
<b>National training fund</b>	<b>\$500 000</b>	<b>\$600 000</b>
<b>Transmission support funding</b>		
Infrastructure and operational costs	\$1 500 000	\$1 500 000
Subsidised access to sites	\$156 989	\$94 769
<b>Total transmission support funding</b>	<b>\$1 656 989</b>	<b>\$1 594 769</b>
<b>Total Funding</b>	<b>\$7 623 989</b>	<b>\$7 782 769</b>

Source DCITA, submission no. 75, pp. 4-5, and DCITA, submission no. 75.3, p. 1. Note: Figures are not inclusive of GST.

2.123 DCITA added that a further \$418 067 (plus \$41 807 GST) was provided for RPH services, from the National Transmission Network (NTN) Residual Funding Pool. This fund was created following the sale of NTN in 1999 to ensure that Government commitments were met in relation to transmission arrangements for national, community and remote commercial broadcasters, and for RPH.<sup>108</sup>

2.124 In summary, for 2006-07, ethnic broadcasting received \$2 743 900 in core and targeted funding. Indigenous broadcasting received \$670 772, and RPH received \$315 499. Indigenous broadcasters also received approximately \$13 million, and RPH received additional funding for transmission support. It should be noted that general community broadcasting only received \$1 280 640 in core funding.

108 DCITA, submission no. 75.3, p. 2.

- 2.125 It is noted that the three identified groups can also apply for general funding in competition with general community broadcasters.

### 2007-08 financial year commitment

- 2.126 The Australian Government delivered the 2007-08 Budget on 8 May 2007. The Portfolio Budget Statement for DCITA revealed an increase in funding for the community broadcasting sector. CBF will be allocated \$7.924 million.<sup>109</sup>
- 2.127 Also announced in the 2007-08 Budget was a commitment of \$10.5 million in funding that will help community broadcasters and national broadcasters establish digital radio infrastructure.<sup>110</sup>
- 2.128 DCITA's Portfolio Budget Statement reveals that the \$10.5 million in digital radio infrastructure funding will be split over four years as follows:
- 2007-08 - \$100 000
  - 2008-09 - \$6 145 000
  - 2009-10 - \$2 077 000
  - 2010-11 - \$2 129 000.<sup>111</sup>
- 2.129 It is understood that approximately \$300 000 of this funding is to be allocated to the national broadcasters in 2008-09, to initiate a competitive tender process.<sup>112</sup>
- 2.130 CBAA stated that the community broadcasting sector:
- ... welcomes the Government's Budget commitment of \$10.1 million for community radio stations to begin the implementation of digital radio from January 2009 ... the funding will enable community radio broadcasters to extend their track record in

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109 <[www.dcita.gov.au/\\_\\_data/assets/pdf\\_file/67554/2007-08\\_CITA\\_PBS\\_02\\_DCITA.pdf](http://www.dcita.gov.au/__data/assets/pdf_file/67554/2007-08_CITA_PBS_02_DCITA.pdf)>, accessed 9 May 2007.

110 <[www.minister.dcita.gov.au/media/media\\_releases/\\$10.5\\_million\\_for\\_community\\_and\\_national\\_digital\\_radio\\_broadcasting](http://www.minister.dcita.gov.au/media/media_releases/$10.5_million_for_community_and_national_digital_radio_broadcasting)>, accessed 10 May 2007.

111 DCITA Portfolio Budget Statements 2007-08, p. 5, <[www.dcita.gov.au/\\_\\_data/assets/pdf\\_file/67554/2007-08\\_CITA\\_PBS\\_02\\_DCITA.pdf](http://www.dcita.gov.au/__data/assets/pdf_file/67554/2007-08_CITA_PBS_02_DCITA.pdf)>, accessed 10 May 2007.

112 DCITA Portfolio Budget Statements 2007-08, p. 5, <[www.dcita.gov.au/\\_\\_data/assets/pdf\\_file/67554/2007-08\\_CITA\\_PBS\\_02\\_DCITA.pdf](http://www.dcita.gov.au/__data/assets/pdf_file/67554/2007-08_CITA_PBS_02_DCITA.pdf)>, accessed 10 May 2007; <[www.minister.dcita.gov.au/media/media\\_releases/\\$10.5\\_million\\_for\\_community\\_and\\_national\\_digital\\_radio\\_broadcasting](http://www.minister.dcita.gov.au/media/media_releases/$10.5_million_for_community_and_national_digital_radio_broadcasting)>, accessed 10 May 2007.

innovation and to provide fresh and vital services designed to supplement existing analogue offerings.<sup>113</sup>

## Analysis of Australian Government funding

2.131 CBF's submission to the inquiry provided a comprehensive analysis of funding for the community broadcasting sector over the past two decades.

2.132 CBF analysed sector funding across two time-frames:

... firstly a long-term historical perspective since the Foundation's inception and secondly over the past ten financial years as a more accurate view of the current funding mix since the introduction of Targeted Funding. The latter time-frame relates to the community broadcasting sector in a more mature phase of its development.<sup>114</sup>

2.133 CBF further explained:

Each time-frame will be charted firstly in unadjusted dollars and then as adjusted for the effects of inflation utilising the Australian Bureau of Statistics (ABS) longer term [Consumer Price Index] to demonstrate the decline in the real dollar value of the funding provided over each period and the substantial reduction in the quantum of support available per service.<sup>115</sup>

2.134 CBF's submission charted unadjusted funding trends and sector growth for the period 1984-85 to 2005-06, which revealed:

- the total level of Australian Government support has risen by 1265%
- the community broadcasting sector as measured by the number of long-term licensed services has grown by 722%
- annual core funding (annual recurrent funding) levels have increased by 653%
- the notional level of annual total funding per service increased by only 66% due to strong sector growth
- the notional level of annual core funding per service declined by 8% over the period due to strong sector growth.<sup>116</sup>

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113 CBAA media release 9 May 2007, <[www.cbaa.org.au/content.php/236.html?newsid=1031](http://www.cbaa.org.au/content.php/236.html?newsid=1031)>, accessed 10 May 2007.

114 CBF, *submission no. 114*, p. 16.

115 CBF, *submission no. 114*, p. 16.

116 CBF, *submission no. 114*, p. 17.

2.135 CBF explained:

Accordingly it can be seen that there was a large increase in the absolute level of Australian Government funding for the community broadcasting sector across more than two decades. However, due to the community broadcasting sectors massive expansion the level of total funding available per service increased by only sixty-six percent over the period and the component of funding that is ongoing (core funding) has actually declined.<sup>117</sup>

2.136 CBF's submission also charted consumer price index (CPI) adjusted funding trends and sector growth for the period 1984-85 to 2005-06, revealing:

- the total level of Australian Government support has risen by 541%
- the community broadcasting sector as measured by the number of long-term licensed services has grown by 722%
- annual core funding (annual recurrent funding) have increased by 254%
- the notional level of annual total funding per service declined by 22% due to strong sector growth
- the notional level of annual core funding per service declined by 57% over the period due to strong sector growth.<sup>118</sup>

2.137 CBF explained:

... it can be seen that when Australian Government funding is adjusted for the effects of inflation ... the level of funding over the period increased by 541% but has not matched the sector's strong rate of growth ... the level of total funding available per service has declined since 1992-93.<sup>119</sup>

2.138 CBF added:

Despite the introduction of targeted funding in 1996-97 and additional project and other funding in recent years, the level of annual total funding available per service when adjusted against the CPI has been below the [1984-85] level ... since 1992-93. In the current year funding available per service is 22% below that level.<sup>120</sup>

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117 CBF, *submission no. 114*, p. 17.

118 CBF, *submission no. 114*, p. 18.

119 CBF, *submission no. 114*, p. 18.

120 CBF, *submission no. 114*, p. 18.



2.139 CBF also explained the drop in core funding component levels:

... the only guaranteed funding component, core funding, when adjusted against the CPI, has similarly been below the initial funding level per service for the last fourteen years. As the last increase in core funding other than by partial indexation was in 1993-94 the measure of annual core funding per service when adjusted by the CPI has shown the most marked decrease over the period to only 43% of the 1984-85 level.<sup>121</sup>

2.140 CBF's submission charted unadjusted funding trends and sector growth for the 1996-97 to 2005-06 period, revealing:

- the total level of Australian Government support has risen by 61%
- the community broadcasting sector as measured by the number of long-term licensed services has grown by 54%
- annual core funding levels (annual recurrent funding) have increased by 17%
- annual targeted funding levels have increased by 13%
- the notional level of annual total funding per service increased by only 5% due to continued strong sector growth and diversification
- the notional level of annual core funding per service declined by 24% over the period also due to strong sector growth and diversification
- the notional level of targeted funding per service declined by 26% over the period also due to strong sector growth and diversification.<sup>122</sup>

2.141 CBF explained:

In summary there was a 61% increase in the level of Australian Government funding for the community radio sector across the decade however due to the community broadcasting sector's continued expansion and diversification the level of total funding available per service increased by only 5% over the period. For the same reasons the component of funding that is ongoing (core funding) grew by 17% but on a per service basis has actually declined by almost one quarter. The new Targeted Funding component introduced in 1996-97 has increased over the period by

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121 CBF, *submission no. 114*, pp. 18-19.

122 CBF, *submission no. 114*, p. 19.

13% but when considered on a per service basis has declined by 26%.<sup>123</sup>

2.142 CBF's submission charted CPI adjusted funding trends and sector growth for the period 1996-97 to 2005-06, revealing:

- the total level of Australian Government support has risen by 31%
- the community broadcasting sector as measured by the number of long-term licensed services has grown by 54%
- annual core funding (annual recurrent funding) has declined in real terms by 6%
- annual targeted funding has declined in real terms by 8%
- the notional level of annual total funding per service declined by 15% due to strong sector growth and diversification
- the notional level of annual core funding per service declined by 39% over the period due to strong sector growth and diversification
- the notional level of annual targeted funding per service declined by 40% over the period also due to strong sector growth and diversification.<sup>124</sup>

2.143 CBF explained:

In summary when adjusted for the effects of inflation the level of total annual funding increased by 31% but failed to keep pace with continued sector growth and diversification so that total funding available per service declined in real terms by 15%. The annual level of total core funding in real terms has declined to 6% below that of a decade ago and the level of annual core funding per service has declined by 39%. Similarly the Targeted Funding component introduced in 1996-97 has decreased in real terms over the period by 8% and when considered on a per service basis by 40%.<sup>125</sup>

## Regional and rural stations

2.144 CBF believes that there is a strong argument for increasing the level of Australian Government support for community radio stations in regional and rural areas as an urgent priority:

The CBD [Community Broadcast Database] survey of technical infrastructure revealed that these stations are amongst the most

123 CBF, *submission no. 114*, p. 19.

124 CBF, *submission no. 114*, pp. 20-21.

125 CBF, *submission no. 114*, p. 21.

poorly equipped. The ACMA survey has shown that they have the lowest average income, low levels of staff and comparatively low levels of volunteer involvement by comparison with stations in other locations (although this last factor might be expected as a function of population density).<sup>126</sup>

2.145 CBF summarised some McNair Ingenuity Community Radio Listener Survey results for non-metropolitan areas:

- audience reach is slightly higher at 25% compared to 23% over an average week
- listeners listen to their local community radio service longer – 8.8 hours per week compared to 7.7 hours
- there are twice as many exclusive community radio listeners – 6% or 339,000 listeners
- and that the main reasons for listening are different; people listen firstly for local information/local news (58%); to hear local voices/personalities (43%); because locals can air their views/easy local access (41%) and because stations play Australian music/support local artists (41%).<sup>127</sup>

2.146 CBF explained further:

The McNair Ingenuity results indicate that despite their low resource level regional and rural stations meet the needs of their communities and play a significant role within them. When this information is considered against the broader trends in the reduction of other local media in these areas there is a compelling argument for providing additional public funding to regional and rural community broadcasters to increase their stability, viability and broader level of engagement with their communities.<sup>128</sup>

2.147 CBF's submission outlined station income data for 2003-04, summarised in Table 2.4.

Table 2.4 Radio station total income for 2003-04

Station type	No. of stations	Total Income
Metropolitan	53	\$26 734 709
Suburban	42	\$3 899 816
Regional	94	\$8 308 186
Rural (non-Indigenous)	58	\$4 148 508

Source CBF, submission no. 114, p. 11.

126 CBF, submission no. 114, p. 27.

127 CBF, submission no. 114, pp. 27-28.

128 CBF, submission no. 114, p. 28.

2.148 Gippsland FM suggested that regional areas should not be disadvantaged:

In the event that funds are to be allocated to the sector, it may be prudent to spend these where the benefit may be maximised. For broadcasting – this might mean areas where potential audiences are greatest and therefore regional areas would miss out on the opportunities to develop into new areas of program delivery. It would therefore seem that an equitable process will be required to ensure that regional communities are not disadvantaged.<sup>129</sup>

## State Government funding

2.149 Some State Governments contribute funds to the community broadcasting sector.

2.150 In 2005, the Western Australian (WA) Department of Culture and the Arts managed a one-off grants program to provide support for the community broadcasting sector. The program provided support to innovative programming and/or special capital costs:

Through this fund, community, Indigenous and ethnic media outlets throughout Western Australia received a boost of more than \$1 million in grants.<sup>130</sup>

2.151 The WA Minister for Culture and the Arts added:

Of the 52 applications received, 16 organisations with proven track records in the development and delivery of community, Indigenous or ethnic media received funding. Of these, nine organisations were outside of the Perth metropolitan area. Notably, a special grant of \$665,216 was made to community television station Access 31 for infrastructure requirements and local program development.<sup>131</sup>

2.152 The Northern Territory Department of Corporate and Information Services stated that it has provided over \$100 000 annually in operational funding to community radio stations to facilitate training.<sup>132</sup>

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129 Gippsland FM, *submission no. 76*, p. 9.

130 WA Minister for Culture and the Arts, *submission no. 5*, p. 1.

131 WA Minister for Culture and the Arts, *submission no. 5*, p. 2.

132 NT Department of Corporate and Information Services, *submission no. 13*, p. 2.

## Level of government funding used by stations

- 2.153 Some stations depend to a great extent on government funding (predominantly from the Australian Government), while some stations obtain little or no funding from government sources.
- 2.154 In 2003-04, revenue from the Australian Government through the CBF was a relatively small part of a station's income, at around 6.4 per cent.<sup>133</sup>
- 2.155 DCITA stated:
- The 6.4 per cent figure is probably higher now - the Commonwealth has lifted its CBF funding from around \$5.5 million per year to \$7.6 million since the [2003-2004] survey was done.<sup>134</sup>
- 2.156 Western Victoria's 3WAY FM relies on Australian Government grants substantially:
- In a typical year successful CBF grants total about \$12,000, which equates to Federal Government support of about 30% of our overall income.<sup>135</sup>
- 2.157 Rainbow FM has less of a reliance on government grants:
- Our Annual Budget is approximately \$42000-00 ... we have received a total of approximately \$8000-00 in [grants through the CBF] in the past nine years.<sup>136</sup>
- 2.158 Melbourne's 3RRR is fully self-sufficient:
- The station is self-funding through sponsorship (primarily on-air promotions) and listener subscriptions with an annual contribution from [Royal Melbourne Institute of Technology] and The University of Melbourne, which represents approximately 4% of the yearly operating budget. Over the last decade the station has established a secure, stable and financially viable independent operation.<sup>137</sup>
- 2.159 Smaller stations manage to survive through sponsorship, donations and grants, but have little scope for developing their services without significant funding.

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133 DCITA, *submission no. 75*, p. 3.

134 DCITA, *submission no. 75*, p. 3.

135 3WAY FM, *submission no. 30*, p. 3.

136 Rainbow FM, *submission no. 18*, p. 3.

137 3RRR, *submission no. 110*, p. 5.

2.160 Some stations appear to rely less on government grants, while some stations prefer to be totally independent.

2.161 Lismore's 2NCR main wish for the future is to:

... continue to be self sufficient operationally with most of our funding coming from sponsorship, membership and donations, with the occasional grant covering costly items such as new transmission equipment and other new technology, as well as sector wide needs such as management and technical training.<sup>138</sup>

2.162 Western Radio Broadcasters is hesitant to rely too much on grants and considers government funding to be a bonus:

We adopt a slightly different attitude than some of my colleagues might adopt. But I believe, with government grants, they are the icing on the cake because the government could decide tomorrow there are no more grants. So what we do within our business plan is look at them as the icing on top of the cake. We have to generate the funds to run our radio station. We are eternally grateful for those grants because they do ease the pressure and they do allow us to put back into our community, but by the same token they are not locked away in that they are going to be there till the year dot, either. To rely on them, I think, would be a little silly.<sup>139</sup>

## The need for increased funding

2.163 Many submissions to the inquiry argued for an increase in funding from governments for community broadcasting.

2.164 Several submissions raised the issue of the need for increased funding to upgrade and maintain infrastructure.

2.165 AFMN argued for funding for supporting station operations:

Most of the administration work of community radio stations is aimed at raising sufficient funds to stay on the air. Government Grants are frequently tied to specific projects such as 'training' ... funding should be available for general operating expenses (rent electricity etc). Apart from a small grant available through the Community Broadcasting Foundation which partly subsidises

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138 2NCR, *submission no. 127*, p. 5.

139 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 59-60.

transmission expenses, there are no other operating subsidies available. This is a major defect in the funding process.<sup>140</sup>

## Infrastructure

2.166 Many stations argued that with access to increased Government funding they could replace significant capital items.

2.167 CBF stated:

A sector survey conducted in 2004 revealed that much of the community radio sector operates with inadequate technical infrastructure.<sup>141</sup>

2.168 CBF added:

What would be considered essential resources and basic infrastructure by national and commercial broadcasters is often beyond the capacity of community broadcasting organisations to acquire and/or sustain.<sup>142</sup>

2.169 CBF believes that:

... there is a compelling need for a much higher level of Australian Government funding to ensure that basic technical infrastructure levels are achieved and maintained.<sup>143</sup>

2.170 CBF outlined baseline technical infrastructure requirements for stations in its submission, and elaborated on the 2004 sector-wide survey of infrastructure:

- ... over a third of stations have only one broadcast studio
- regional and rural stations were on average less well resourced than metropolitan stations, as were youth and religious stations compared to the other sub-sectors
- only 34% of stations had a studio suitable for training separate from their main broadcast/production studios
- only 71% of stations have a dedicated production studio
- 93% of stations have audio production computers, however only 80% of stations have an audio production computer as a playback device in a studio and only 43% of stations have their computers fully networked

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140 AFMN, *submission no. 40*, p. 6.

141 CBF, *submission no. 114*, p. 2.

142 CBF, *submission no. 114*, p. 12.

143 CBF, *submission no. 114*, p. 14.

- only 83% [of stations] had telephone interview facilities and 49% had talkback facilities ... only 79% of stations had portable interview facilities
  - 56% [of stations] had outside broadcast facilities
  - 89% of stations have on-site Internet access.<sup>144</sup>
- 2.171 CBF explained that the survey results suggested that many community radio stations still do not meet modest baseline technical infrastructure requirements.<sup>145</sup>
- 2.172 CBAA discussed access to computing production facilities:
- More needs to be done to encourage the availability of computer based resources across all broadcast and production studios within stations. Only 43 percent are fully networked, and 20 percent are not networked at all.<sup>146</sup>
- 2.173 Eastside Radio explained its situation regarding infrastructure:
- If there were funding available we would update our equipment, finally get up to date with technical developments, improve transmission and our signal, move to bigger premises ... the technical resources we need are a new antenna, computer based broadcasting facilities, computer in on air studio, a second studio, digital editing, training facilities.<sup>147</sup>
- 2.174 Whyalla's 5YYY FM discussed the need for funding to upgrade its ageing equipment:
- With access to more funding 5YYY FM could update equipment which is in some cases twenty five (25) years old and well past the end of its useful life.<sup>148</sup>
- 2.175 TEABBA stated that one of its current objectives is to renovate each Indigenous member community's RIBS Unit:
- The current state of an average RIBS unit today would consist of 1 x CD player, 1 x Cassette Player, 1 x Small TV Monitor, 1 x VHS, 1 x Telephone Interface and that's on a good day! Renovating the RIBS Units would entail the installation of all new equipment, including a computer.<sup>149</sup>

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144 CBF, *submission no. 114*, p. 14.

145 CBF, *submission no. 114*, p. 14.

146 CBAA, *submission no. 61*, p. 35.

147 Eastside Radio, *submission no. 9*, p. 3.

148 Whyalla FM, *submission no. 33*, p. 2.

149 TEABBA, *submission no. 60*, p. 8.



2.176 When asked what the state of broadcast equipment was like for Indigenous broadcasters, TEABBA stated:

There are some communities that we have assisted to buy new equipment, but they attach it to old equipment and so it does not serve a purpose. There is a piece of equipment called a tie line that we use to make a better quality program, and the broadcast is a better quality, but they hitch it up to an old decoder or another old piece of equipment. It is a total waste of money to put in new pieces of equipment with equipment that exists in the community. It either blows out or – because there is no air conditioning – it does not serve a purpose. It is too hot or it blows up. Those are the problems that we have been finding technically.<sup>150</sup>

2.177 TEABBA also discussed the condition of some of the Indigenous stations:

Some communities might have the RIBS unit in an old building. At one stage we had to relocate a unit to another part of a building because the floor was almost going to fall through. We brought this up with the community council and they said they did not have any money. We scratched and saved and were able to relocate it to another room. Then when the town clerk went in and had a look, he actually fell through the floor.<sup>151</sup>

2.178 CAAMA discussed the issue of capital upgrade for Indigenous broadcasters:

Capital is a big issue... [DCITA] will not give us funding for capital. When you apply for funding from DCITA, you do not get capital funding. So we have to fund it through our own activity-generated income, which is difficult because most of the [activity-generated income] we get is project funded.<sup>152</sup>

2.179 CAAMA added:

... we provide technical and training support out at Santa Teresa. We go out there and the equipment that they use for the RIBS units was there 15 years ago. CAAMA has had to go out and buy cameras and radio equipment and computers just for us to run a program and train them. We are paying for this out of our own outcome, not out of any funding.<sup>153</sup>

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150 TEABBA, *transcript of evidence 21 July 2006*, p. 20.

151 TEABBA, *transcript of evidence 21 July 2006*, p. 21.

152 CAAMA, *transcript of evidence 21 July 2006*, p. 15.

153 CAAMA, *transcript of evidence 21 July 2006*, p. 16.

2.180 CBAA discussed infrastructure needs:

The community broadcasting sector's infrastructure needs have increased markedly in recent years due to several concurrent factors:

- the recent surge in new licensees with establishment infrastructure needs
- the ageing of early station infrastructure
- demand for regional extension of RPH services
- national training needs
- permanent licensing of CTV
- technological change.<sup>154</sup>

2.181 CBAA suggested that the sector needs to:

... develop the appropriate infrastructure to support its ongoing role in the national provision of accredited broadcast skills training. Most community broadcasting stations do not currently possess ideal training facilities.<sup>155</sup>

2.182 CBAA summarised infrastructure requirements for the sector:

Community broadcasting stations are lean operations. The sector's volunteer ethic and cooperative ethos assist the containment of operational costs. However capital development and recapitalisation costs for broadcast infrastructure cannot be similarly minimised. With many older stations requiring recapitalisation and a host of new community radio and television stations needing assistance with meeting the infrastructure demands of a full-time service there is a clear need for access to ongoing additional resources for these purposes.<sup>156</sup>

## Funding Strategy Group funding request for 2007-08

2.183 The 2007-08 community broadcasting sector funding submission was prepared by the sector's Funding Strategy Group (FSG), and provided to the Minister for Communications, Information Technology and the Arts in October 2006.<sup>157</sup>

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154 CBAA, *submission no. 61*, pp. 34-35.

155 CBAA, *submission no. 61*, p. 35.

156 CBAA, *submission no. 61*, p. 35.

157 FSG, *exhibit no. 11*, p. i.

2.184 FSG is a working group dealing with sector funding issues, and is comprised of the main peak community broadcasting sector organisations including:

- CBAA, including representatives of CTV and ACB
- NEMBC
- RPH Australia
- AICA (Australian Indigenous Communications Association)
- CBF.<sup>158</sup>

2.185 FSG explained how it operates:

Each year the FSG determines a common set of funding priorities for the maintenance and development of the community broadcasting sector, develops a funding proposal and pursues its adoption through the Federal Budget process.<sup>159</sup>

2.186 FSG believes:

... research also shows that community broadcasting remains critically under-resourced - a 'threadbare' media sector unable to fully realise its potential ... a compelling argument now exists for recognition of the community broadcasting sector's value and potential through a more appropriate level of Australian Government funding support.<sup>160</sup>

2.187 FSG added:

The initiatives outlined in the 2007-08 sector funding submission seek to strengthen community broadcasting in four key areas: content production, infrastructure, training and sector coordination and planning. Additional resources in these areas will assist the sector to capitalize on its strengths across radio, television and related new media during a challenging period of industry change.<sup>161</sup>

2.188 CBAA put forward the case for increased targeted funding:

Targeted funding in transmission and training is widely appreciated and will do much to enhance the ongoing

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158 FSG, *exhibit no. 11*, p. i.

159 FSG, *exhibit no. 11*, p. i.

160 FSG, *exhibit no. 11*, p. i.

161 FSG, *exhibit no. 11*, p. ii.

sustainability and growth of the sector. But there would be serious cause for concern if such support is not continued beyond the current four year commitment.<sup>162</sup>

2.189 FSG requested a funding allocation of \$17.561 million for the 2007-08 financial year, encompassing:

- Content Production - \$7.268m
- Infrastructure - \$6.298m
- Training - \$2.155m
- Sector Coordination & Planning - \$1.84m.<sup>163</sup>

2.190 A breakdown on what FSG was specifically seeking is detailed in Table 2.5 below.

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162 CBAA, *submission no. 61*, p. 42.

163 FSG, *exhibit no. 11*, p. 2.

Table 2.5 Funding Strategy Group submission for 2007-08

<b>Area</b>	<b>Amount</b>
<b>Radio content production</b>	
New content production	\$3.25 million per annum
Ethnic, Indigenous and RPH content production	\$2 581 700 per annum
AMRAP	\$710 000 per annum
<b>Total funding requested for radio content production</b>	<b>\$6 541 700 per annum</b>
<b>Radio infrastructure</b>	
Community Radio Infrastructure Renewal and Development Fund	\$3 million per annum
First phase of digital radio implementation	\$2 458 000 in 2007-08
<b>Total funding requested for radio infrastructure</b>	<b>\$4 336 000 in 2007/08</b>
<b>Television content production</b>	
CTV Program Production Fund	\$500 000 per annum
CTV-X National Program Exchange	\$56 000 per annum, plus \$5 000 one-off set-up costs
CTV-Online	\$165 000 per annum
<b>Total funding requested for Television Content Production</b>	<b>\$0.726 million</b>
<b>Television infrastructure</b>	
CTV-Connect	\$340 000 in 2007/08 only
Digital Infrastructure Fund	\$500 000 per annum
<b>Total funding requested for Television Infrastructure</b>	<b>\$0.84 million</b>
<b>Accredited training</b>	
Radio training	\$1.8 million in 2007-08, rising to \$2.4 million per annum thereafter
Television training	\$355 000 per annum
<b>Sector Coordination &amp; Planning</b>	
Radio sector coordination & planning	\$1.6 million per annum
Television sector coordination & planning	\$240 000 per annum

Source FSG, exhibit no. 11, pp. 3-24.

## Sector coordination funding

- 2.191 A substantial amount of sector funding goes toward sector coordination and operation of the CBF:

It should also be noted that the General Grants Fund also carries the burden of funding general sector coordination and the CBF's own net operating costs. Given rapid sector growth and diversification these costs are now a considerable proportion of the total funds available.<sup>164</sup>

- 2.192 In 2004-05, the total allocation for general community broadcasting was \$1 221 861. CBF drew \$339 223 (28%) for its operation, while CBAA was allocated \$404 000 (33%) toward sector coordination costs.<sup>165</sup>

- 2.193 DCITA also provided details on the operation of CBAA and CBF:

In 2006-07 \$413,000 was allocated [to CBAA] which is 32% of the general grants funds or 5.3% of the total annual funding ... In 2006-07 \$387,683 was allocated for this purpose which is 30% of the general grants funds and 4.9% of total funding.<sup>166</sup>

- 2.194 DCITA also added:

It should be noted that the CBF's ratio of administration costs to project costs is highly efficient and compares favourably to other similar funding agencies.<sup>167</sup>

## Government advertising

- 2.195 Several submissions to the inquiry raised the issue of limited or no government advertising on community radio and television.

- 2.196 ACCESS 31 explained:

Community television stations receive no Federal Government advertising or paid Government public information messages whatsoever. From a marketing perspective, the Government is missing out on unique, dedicated and large audiences which other telecasters cannot reach. SBS, Pay-TV and Commercial Television all receive substantial Federal Government advertising. In many markets community TV regularly out rates SBS and all community

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164 CBF, *submission no. 114*, p. 22.

165 CBF, *submission no. 114*, p. 22.

166 DCITA, *submission no. 75.1*, p. 8.

167 DCITA, *submission no. 75.1*, p. 8.

telecasters have larger audiences than any of the individual Pay TV channels.<sup>168</sup>

- 2.197 ACCESS 31 also discussed the value for money governments would get for advertising on community broadcasting stations:

... the costs of sponsorship on community TV are much more modest than their ratings would suggest, so money goes a long way in local television promotion. Therefore, there is no possible justification for neglecting against the only form of television which takes its local and Australian content obligation to heart, when planning Government information campaigns. Most State Governments have recognised this fact and include community TV sponsorship as part of their government advertising and public awareness campaigns. The Commonwealth must address this imbalance as quickly as possible in the interests of equity as well as in being able to obtain more promotional 'bang for its buck'.<sup>169</sup>

- 2.198 ACB also suggested that it has a significant audience reach which would be beneficial to government advertising campaigns:

If the government advertising option was based on audiences and community interests then our sector would actually do very well out of all of that, I would think, because we have a fairly large slab of the listening audience.<sup>170</sup>

- 2.199 Western Radio Broadcasters also discussed audience reach:

Another issue that I believe needs to be address is the placement of government advertising. Considering that there are in the vicinity of four million people listening to community radio, why isn't community radio receiving more government advertising revenue – not only placement into the niche broadcasting area such as ethnic but also English language?<sup>171</sup>

- 2.200 Huon FM also suggested that government advertising would be suitable for community broadcasting:

There is strong case for some of the Government's advertising expenditure to be allocated to community stations that reach markets not covered by other media. Government information and advertising should be allocated to community broadcasters given

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168 ACCESS 31, *submission no. 35*, p. 12.

169 ACCESS 31, *submission no. 35*, p. 12.

170 ACB, *transcript of evidence 6 September 2006*, p. 13.

171 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, pp. 55-56.

the range, demographics, and interests of listeners to community radio. Community stations should be placed on the Government's list of advertising outlets.<sup>172</sup>

2.201 Radio Logan discussed the benefit of government advertising for local communities:

Currently the Federal Government rarely, if at all, sponsors community radio stations. With many government initiatives focusing on local aspects of the Australian community, and the fact that community radio reaches that community, it seems logical that the government should get their message across by sponsored announcements on community radio stations. This would not only benefit the community, but would be a way for stations to raise much needed funds for the day to day running of the station.<sup>173</sup>

2.202 Brisbane's 4EB FM suggested that government advertising can reach all communities:

With services such as 4EB FM available, government advertising can more [effectively be] communicated to all residents (including those that have English as a second language). This can help to stop divisions occurring in the community due to lack of information.<sup>174</sup>

2.203 CBAA summarised:

... there is no inherent barrier to our increasingly being a conduit for government portfolios and departments in terms of helping spread the message ... by and large most stations were keen to embrace the opportunity to carry government information campaigns ... [we will] talk to portfolios and agencies about trying to build greater patronage and support for our services through government information campaigns.<sup>175</sup>

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172 Huon FM, *submission no. 17*, p. 5.

173 Radio Logan, *submission no. 47*, p. 3.

174 4EB FM, *submission no. 54*, p. 2.

175 CBAA, *transcript of evidence 31 May 2006*, p. 5.



## Committee comment

- 2.204 The Committee is impressed by many examples of good governance among community broadcasters.
- 2.205 However, during the course of the inquiry some submissions sought to use the inquiry process to air details of personal conflict at community stations. This reinforced for the Committee the importance of a professional management structure, and appropriate internal procedures and management expertise.
- 2.206 There are enormous benefits from installing a management and governance structure that includes community members with the appropriate skills, knowledge and experience.
- 2.207 The Committee recommends that the Australian Government, in conjunction with the sector's peak bodies, develop a series of guidelines that set up a template for the structure of station boards or management committees.
- 2.208 The Committee also acknowledges that establishing governance structures is not usually the role of Government, as ACMA and DCITA have noted. However, given that the Australian Government is accountable for the way in which funds provided to community broadcasters are spent and is responsible for the very valuable spectrum made available to broadcasters, the Committee considers it important to ensure effective management and governance practices are in place.

## **Recommendation 1**

**The Committee recommends that the Australian Government, in conjunction with the sector's peak bodies, develop a guiding template for the structure of station boards or management committees.**

**The template for a community broadcaster board or management committee should ideally include:**

- **local council representative(s)**
- **educational institution representative(s)**
- **chartered accountant**
- **local Chamber of Commerce or business council representative**
- **other people suitably trained or qualified for managing such a community business.**

2.209 The Committee is impressed by the number of stations that manage to provide a valuable service to their communities, often with limited financial resources.

2.210 Given pressures on funding, the Committee appreciates that some stations have made financial decisions in relation to insurance and training requirements. However, failure to invest in insurance, particularly defamation insurance, is indicative of a poor understanding of business risks.

2.211 The Committee is of the opinion that an increase in forward planning and business training would be of great benefit to community broadcasting stations.

2.212 To increase the level of effective governance in the sector, the Committee recommends that the Australian Government provide additional funding to the sector's peak bodies for the delivery of training material for the sector that focuses on management and effective business planning.

## **Recommendation 2**

**The Committee recommends that the Australian Government provide an additional \$500 000 per year for four years, for the development and delivery of training material for the sector that focuses on management training for the community broadcasting sector.**

**This funding should be effective from 2008-09 and should be in addition to the \$2.2 million over four years that the sector is currently utilising.**

- 2.213 The Committee is of the opinion that management training should be a key component of the operation of a community broadcasting station.
- 2.214 The Committee is also confident that an ethos of better management will be instilled in the sector and in particular, filter down through the substantial number of volunteers.
- 2.215 The Committee considers that a significant proportion of the sector can be trained, with increased funding and with improved training methods. For example, a significant proportion of material can be delivered over the internet. Australia already has many institutions that specialise in distance education. Training for the community broadcasting sector could become more efficient and streamlined.
- 2.216 The Committee also recommends that the Australian Government, through ACMA, ensures that management training requirements are incorporated as community broadcasting licence conditions, as part of the licence renewal process.

## **Recommendation 3**

**The Committee recommends that the Australian Government, through the Australian Communications and Media Authority, require that compulsory accredited business management training is incorporated as a community broadcasting licence condition, as part of the licence renewal process.**

- 2.217 The Committee notes that stations that have demonstrated effective management processes, and have appropriate measures in place such as defamation insurance, are more likely to be considered for Australian Government funding in the future.
- 2.218 The Committee considers that stations with improved management will be able to obtain more sponsorship and private sector funding and also have fewer internal disputes.
- 2.219 The Committee is of the opinion that funding disbursement should be tied to effective management and accountability to the communities particular stations serve.

#### **Recommendation 4**

**The Committee recommends that the Community Broadcasting Foundation reassess their criteria for funding disbursement, taking into account effective management, business planning and accountability to the communities those stations serve.**

- 2.220 The Committee acknowledges the significant amount of financial support given by the Australian Government to the sector, some \$86 million since 1984.
- 2.221 The Committee registers its deep concern at the drop in Australian Government funding support for community broadcasting, on a per station basis, over the past two decades.
- 2.222 The Committee notes the apparent disparity in station income across metropolitan, suburban, regional and rural stations, and also notes the varying levels of dependence on Australian Government funding.
- 2.223 The sector has seen a significant number of new stations established, particularly over the past 15 years. This growth in services and diversification in types of stations has given rise to a vibrant community broadcasting sector.
- 2.224 The Committee considers that the level of financial support for this important sector should have increased significantly as the number of stations rose.

- 2.225 The Funding Strategy Group requested a significant increase in funding for the 2007-08 financial year. The Committee agrees that a substantial increase in funding for the sector is urgently needed.
- 2.226 The Committee notes that core funding has not increased by any significant amount in the 2007-08 Federal Budget. Core funding continues to fall well short of the amount requested by the Funding Strategy Group and the amount considered adequate by the Committee.
- 2.227 Notwithstanding 2007-08 funding levels that have been announced, the Committee considers that the additional funding required is relatively modest. Accordingly, the Committee recommends an increase in core funding for 2007-2008.
- 2.228 The Committee also recommends that core funding for the sector should be indexed and reviewed regularly to ensure funding remains proportionate to growth in the sector.
- 2.229 The Committee notes that funding is not consistent for many stations from year to year. The Committee is of the opinion that stations should receive regular funding, enabling the placement of paid station managers and establishing consistency of operations.
- 2.230 Therefore the Committee recommends that an increase in funding should be allocated to the general community broadcasting part of core funding, and be disbursed by the Community Broadcasting Foundation for the purposes of funding station manager positions. The Community Broadcasting Foundation can disburse those funds on an application basis to stations according to set criteria such as need for management position(s), population and area served, current resources available, etc.
- 2.231 The Committee is confident that a paid station manager, combined with effective management training, will see a significant increase in management standards across the sector.

## **Recommendation 5**

**The Committee recommends that the Australian Government increase the general community broadcasting category of core funding for the community broadcasting sector by \$10 million, with indexed annual increases.**

**This increase in funding is for the purpose of funding community broadcasting station manager positions.**

**This funding increase should be effective for the 2007-08 financial year.**

**The Committee also recommends that the Australian Government review this level of funding every three years to ensure it remains proportionate to sector growth.**

- 2.232 The Committee acknowledges the significant amount of financial support in the form of targeted funding given by the Australian Government to the community broadcasting sector.
- 2.233 However, the Committee notes that the value of targeted funding has declined in real terms and recommends that targeted funding levels for the sector are increased. Funding announced in the 2007-08 Federal Budget did not address this issue.
- 2.234 In particular, an increase in targeted funding over several years would address the sector's infrastructure requirements, including the urgent upgrade of equipment and facilities for all community broadcasters.
- 2.235 Therefore the Committee recommends that the Australian Government increase targeted funding for the community broadcasting sector to \$5 million for 2007-08, with indexed annual increases.
- 2.236 The Committee recommends that this increased level of targeted funding should continue for four years.

## **Recommendation 6**

**The Committee recommends that the Australian Government increase targeted funding for the community broadcasting sector to \$5 million, with indexed annual increases.**

**This funding increase should be effective for the 2007-08 financial year.**

**The Committee also recommends that targeted funding should continue for four years, from 2007-08.**

- 2.237 The Committee fully supports a substantial increase in funding for infrastructure upgrades. However, the targeted funding increases for infrastructure upgrades that have been recommended are for a set time frame.
- 2.238 As infrastructure upgrades occur the Committee urges broadcasters to implement better business and financial planning that factors in the replacement of ageing and redundant equipment in future years.
- 2.239 The Committee is aware that regional and rural areas have a much smaller population than metropolitan and suburban areas, but is also aware of the increased importance of a local community broadcasting service for a particular regional or rural community. Many regional and rural areas rely on their community radio stations as their only source of local information and entertainment.
- 2.240 The Committee is concerned that the ever more important regional and rural community broadcaster will continue to struggle to maintain financial stability in typically small markets.
- 2.241 The Committee therefore recommends that the Australian Government ensure that CBF grants provide to regional and rural stations the funding support appropriate to the services they deliver.

### **Recommendation 7**

**The Committee recommends that the Australian Government ensure that regional and rural community broadcasting stations are not financially disadvantaged, compared to metropolitan stations, and receive support appropriate to the services they deliver, with regard to Australian Government grants disbursed by the Community Broadcasting Foundation.**

- 2.242 The Committee is aware of the extensive and diverse audience reach of community broadcasting services.
- 2.243 The Committee recognises that there is the opportunity for the Australian Government to reach a wider audience by advertising its programs through community broadcasting services.
- 2.244 In particular, the Committee considers that there is great potential for the delivery of advertising on government programs to ethnic, Indigenous and RPH audiences.
- 2.245 The Committee strongly suggest that Government Departments better utilise community broadcasting as a means to advertise Government programs and initiatives.
- 2.246 The Committee recommends that the Australian Government annually report to Parliament the percentage of Australian Government advertising expenditure that it allocates to the community broadcasting sector, and to justify nil returns.

### **Recommendation 8**

**The Committee recommends that the Australian Government annually report to Parliament the percentage of Australian Government advertising expenditure that it allocates to the community broadcasting sector, and justify nil returns.**



## The state of the community broadcasting sector

- 3.1 This chapter discusses the value of the community broadcasting sector to Australian media. In particular, the chapter outlines recent studies demonstrating the importance of the sector.
- 3.2 The chapter includes an examination of the sector's ethos and an outline of the services provided by community broadcasters. More detail is provided on the three categories of broadcaster identified as having special needs or cultural sensitivities.
- 3.3 The chapter also discusses the sector's contribution to the economy, and the importance of the community broadcasting sector as a training ground for the wider media industry including the national and commercial broadcasters.

### **Recent studies**

- 3.4 A considerable amount of research and survey work has been conducted to establish the significance of the community broadcasting sector in Australia's broader media sector.
- 3.5 Several comprehensive studies of the community broadcasting sector have been completed in recent years. The studies are:
  - Culture Commitment Community – The Australian Community Radio Sector
  - Survey Of The Community Radio Broadcasting Sector 2002-03

- Community Broadcast Database: Survey Of The Community Radio Sector 2003-04 Financial Period
- Community Radio National Listener Surveys (2004 and 2006)
- Community Media Matters: An Audience Study Of The Australian Community Broadcasting Sector.

3.6 Each of these studies and their findings is described below.

### Culture Commitment Community – The Australian Community Radio Sector<sup>1</sup>

3.7 This study was conducted between 1999 and 2001, by Susan Forde, Michael Meadows, Kerrie Foxwell from Griffith University.

3.8 CBF discussed the research:

This seminal work studies the current issues, structure and value of the community radio sector from the perspective of those working within it as volunteers and staff. It provides an overview of the community radio sector and a framework for understanding its role as a cultural resource. In particular it explores the value of localism, ethnic and Indigenous community radio programming, news and current affairs services, the sector's training role and funding issues.<sup>2</sup>

3.9 The research was funded and supported by the Australian Research Council, CBAA, CBF and DCITA.<sup>3</sup>

3.10 Meadows et al. outlined the scope of the study:

- This initial three-year study surveyed station managers, general volunteers and news and current affairs worker. In total more than 350 surveys were conducted. The surveys were designed to gather information on a range of issues. Station Managers were surveyed about subscription levels, volunteer participation, their perceived contribution to their local community, training offered, news services and some basic demographics concerning income, age, education, etc ...

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1 Forde, S., Meadows, M. and Foxwell, K. (2002) *Culture Commitment Community – The Australian Community Radio Sector*.

2 CBF, *submission no. 114*, p. 5.

3 Forde, S., Meadows, M. and Foxwell, K. (2002) *Culture Commitment Community – The Australian Community Radio Sector*, pp. 1-2.

- A separate survey of general volunteers sought information about 'everyday volunteers' involved in on-air presentation and program production, asking questions about their programs, aims, audiences and their reasons for involvement in community radio. News and current affairs workers were surveyed about their 'journalistic practices', station policies on news and current affairs, editorial autonomy and if they saw themselves as 'journalists'. All three surveys shared some questions on the respondents' general views on community radio and demographics.<sup>4</sup>

3.11 Meadows et al. explained their use of focus groups in the study:

In order to gather more substantive and qualitative commentary on themes that emerged during the survey results and to pursue areas of interest to ourselves and our industry partners, we conducted focus group discussion in the following centres: Brisbane; Townsville; Canberra; Sydney; Bathurst; Darwin; Hobart; Melbourne; Warrnambool; Adelaide; Port Augusta; Perth; and Albany. In each focus group, we posed general areas for discussion which were:

- The role of community radio
- Funding and resources
- The use of new technologies in the sector
- Training
- Representation by key peak bodies and sector representatives
- The future of community radio.<sup>5</sup>

3.12 Meadows et al. discussed some of the key findings from their research;

- In our final report, we conservatively estimated more than 20,000 volunteers in the community broadcasting sector contributing more than \$145 million in unpaid labour.
- One of the most significant findings was the extraordinary role community broadcasting is performing as a community cultural resource. As some indication of the level of local content and programming produced by these stations, more than two-thirds of station managers across Australia reported 100 or more hours of locally produced content each week ... the role community radio performs as a cultural resource is multifaceted and varies from

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4 Meadows, Forde, Ewart & Foxwell, *submission no. 89*, p. 4.

5 Meadows, Forde, Ewart & Foxwell, *submission no. 89*, p. 4.

context to context ... community radio represents, services and importantly enables the participation of a multitude of Australian communities in their local media.<sup>6</sup>

3.13 Meadows et al. summarised their other key findings:

- The community radio sector is fulfilling a broad but largely unacknowledged role in the Australian mediascape, particularly as a source of local content.
- The sector is under increasing pressure from policy-making bodies to increase sponsorship and income levels, which is affecting the content and operations of many stations.
- More than 60 percent of community radio is broadcasting to regional areas – in light of the increasing withdrawal of commercial radio from the regions, the sector is proving the only source of local news and information for many towns.
- Experienced workers in the community radio sector are training work experience students and unskilled community members on a daily basis. We estimate approximately 4000-5000 Australians are trained annually in the sector in mostly unaccredited training programs.
- Around 70 percent of the sector are engaged in training programs involving external organisations, usually universities.
- Almost all of the 23 journalism programs around Australia use community radio as a site of work experience for their students.
- Indigenous radio stations in particular have forged close links with journalism programs and are providing a key indicator of ‘reconciliation in action’ – practical reconciliation.
- Sector representatives feel strongly that they have become a significant de facto trainer for the Australian media industry, which remains largely unacknowledged and unrewarded.
- More than 20,000 Australians are involved as volunteers in the community radio sector on a regular basis.
- Volunteers contribute about \$2.79 million in unpaid work hours to the Australian community each week. This equates to more than \$145 million in unpaid work each year.
- 80 percent of stations broadcast a news service, although this is usually a syndicated service. The most used news

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6 Meadows, Forde, Ewart & Foxwell, *submission no. 89*, p. 4.

services are National Radio News service, followed by the Macquarie and Southern Cross networks.

- Indigenous community radio is growing and continues to provide communities with a first level of service, as well as acting as a bridge between cultures.
- Ethnic community radio stations are providing an essential service to the new wave of migrants to Australia. Anecdotes from the ethnic radio sector provided some of the most moving comments to this project.
- As a result of funding decreases, stations are finding it increasingly difficult to remain afloat without significantly adjusting content to attract a larger audience. Some stations feel this is forcing them to adopt more commercial formats, which is against the principles of community radio as outlined in the *Broadcasting Services Act 1992* [the BSA].
- The government advertising agency, OGIA, should be encouraged to investigate sponsorship of community radio and its national satellite networks to make more effective use of the sector to disseminate information.
- Based on the results of the surveys and focus groups, we find that the community radio sector as a whole is an important cultural resource for the Australian community. While some stations may need to connect more directly with their communities, most in the sector are closely integrated and entwined with their local community or their community of interest.<sup>7</sup>

## Survey Of The Community Radio Broadcasting Sector 2002-03<sup>8</sup>

3.14 This report was completed by the Communications Research Unit for ACMA.

3.15 The report:

... provides a descriptive analysis of data collected by the Community Broadcasting Association of Australia (CBAA) from community radio broadcasting licensees. The data was collected in mid-2004 using an online survey under the CBOOnline Database Project. That project was conducted on behalf of the Community Broadcasting Foundation and funded by the Department of Communications, Information Technology and the Arts. ACMA provided financial

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7 Meadows, Forde, Ewart & Foxwell, *submission no. 89*, pp. 5-6.

8 ACMA (2005) *Survey Of The Community Radio Broadcasting Sector 2002-03*, ACMA.

assistance to the CBAA in order to increase the survey response rate and sample size.<sup>9</sup>

3.16 The report highlights:

... key aspects of the community radio broadcasting sector, and includes details about programming, program sources, finances, staffing, volunteers and subscribers for the 2002-2003 financial year.<sup>10</sup>

3.17 The report provides:

... a description of the CBOOnline Database Project, the survey methodology and how the data were analysed. Detailed statistical tables and figures are provided with breakdowns by sub-sector and geographic location.<sup>11</sup>

3.18 The report stated:

The data was collected by the Community Broadcasting Association of Australia (CBAA) as part of its CBOOnline Database Project. An online survey form was used by the CBAA to collect the data from community radio licensees in 2004. The project was conducted on behalf of the Community Broadcasting Foundation and funded by the Department of Communications, Information Technology and the Arts (the Department). The Australian Communications and Media Authority ... provided financial assistance to the CBAA in order to increase the survey response rate and sample size.<sup>12</sup>

3.19 The report's summary provides survey results and information under the following main finding headings:

- almost all community radio services broadcast 24/7
- music is the most prominent program format
- the sector meets the Australian music requirements
- community stations offer a range of music styles
- most content is locally-produced
- audience research is undertaken by some services
- many community radio stations do not employ staff
- the sector relies heavily on volunteers

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9 ACMA (2005) *Survey Of The Community Radio Broadcasting Sector 2002-03*, ACMA, p. 12.

10 ACMA (2005) *Survey Of The Community Radio Broadcasting Sector 2002-03*, ACMA, p. 12.

11 ACMA (2005) *Survey Of The Community Radio Broadcasting Sector 2002-03*, ACMA, p. 12.

12 ACMA (2005) *Survey Of The Community Radio Broadcasting Sector 2002-03*, ACMA, p. 1.

- fine music, ethnic, youth and seniors stations have more subscribers
- community radio represents a substantial sector of the broadcasting industry
- the sector spends most of what it makes on station operations.<sup>13</sup>

## Community Broadcast Database: Survey Of The Community Radio Sector 2003-04 Financial Period<sup>14</sup>

3.20 This study provides an analysis of data collected by CBAA from community radio broadcasting licensees:

The data was collected in May-June 2005 using an online survey under the CBOOnline Community Broadcast Database Project (CBD), [a project] funded by the Department of Communications, Information Technology and the Arts.<sup>15</sup>

3.21 The report provides:

... detailed information on key aspects of the community radio broadcasting sector, and includes details about programming, program sources, finances, staffing, volunteers and subscribers for the 2003-2004 financial year and some comparisons with data from the previous collection. It also provides a description of the CBOOnline Database Project, the survey methodology and how the data were analysed. Detailed statistical tables and figures are provided with breakdowns by sub-sector and geographic location.<sup>16</sup>

3.22 The report also:

... follows the format of the Australian Communication Media Authority (ACMA) report prepared in 2005 by the Communication Research Unit to allow easy comparisons with previous collection statistics.<sup>17</sup>

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13 ACMA (2005) *Survey Of The Community Radio Broadcasting Sector 2002-03*, ACMA, pp. 2-11.

14 CBAA (2006) *Community Broadcast Database: Survey Of The Community Radio Sector 2003-04 Financial Period*, CBAA.

15 CBAA (2006) *Community Broadcast Database: Survey Of The Community Radio Sector 2003-04 Financial Period*, CBAA, p. 1.

16 CBAA (2006) *Community Broadcast Database: Survey Of The Community Radio Sector 2003-04 Financial Period*, CBAA, p. 1.

17 CBAA (2006) *Community Broadcast Database: Survey Of The Community Radio Sector 2003-04 Financial Period*, CBAA, p. 1.

3.23 The report's summary provides survey results and information under the following main finding headings:

- most community broadcasters are on-air 24/7
- community radio is the solo source of local content in many rural and regional communities
- most community broadcasters provide a mix of music and information for the communities they reach
- Australian music content on community radio has increased
- community radio provides a diverse range of music genres
- community broadcasters cater to the special interest programming needs in the community
- most programming is locally produced
- volunteers are the backbone of community broadcasting
- rise in the number of staff employed by community broadcasters in 2003-04
- volunteers are more likely to be male
- a significant amount of young people are involved in the sector
- staff were more likely to be male but the proportion of female staff is increasing
- female volunteers are most frequently involved in on-air presentation while female staff commonly fill an administrative role
- the community broadcasting sector plays a very important role in media training in Australia
- accredited training in the sector nearly doubled
- subscribers and donors broaden the degree of community participation beyond the walls of the station itself, and provide a vital source of revenue
- rise in the number of donations for stations
- stations embrace technology, but resource issues restrict expansion
- the majority of stations still depended on third party for transmission site and/or facility and access costs rose significantly
- there was revenue growth in 2003-04, with certain station types benefiting more than others
- sponsorship is the largest income item, accounting for more than a third of the total income for the sector
- the sector spends most of its income on station operations



- transmission cost rise.<sup>18</sup>

## Community Radio National Listener Surveys

3.24 McNair Ingenuity Research Pty Ltd conducted community radio national listener surveys in 2004 and 2006. Both surveys were coordinated by CBAA and funded by DCITA.<sup>19</sup>

3.25 McNair Ingenuity explained:

In 2004, the first large-scale survey of the Australian population was conducted in order to measure the size of the audience of community radio throughout Australia ... [the 2006 study is the] second such large-scale survey and care was taken to replicate the research methodology and sample characteristics.<sup>20</sup>

3.26 The report revealed that:

[in the 2004 survey] more than seven million Australians – or 45% of people aged 15 and over - listen to community radio in an average month ... the results from [the 2006 survey] are typically stronger in most segments of the audience ...<sup>21</sup>

3.27 The key findings from the 2006 survey include:

- Overall, 86% of Australians aged 15+ listen to some radio in the course of a typical week. 25% of Australians aged 15+, or 4,034,000 people, listen to community radio in a typical week.
- People who tune in to community radio in an average week tend to have a portfolio of radio listening, with 66% listening to both community radio and commercial radio, and 54% listening to both community radio and ABC/SBS radio.
- Conversely, 34% of community radio listeners in an average week do not listen to commercial radio and 46% do not listen to ABC/SBS radio. 17% of community radio listeners do not listen to either commercial radio or

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18 CBAA (2006) *Community Broadcast Database: Survey Of The Community Radio Sector 2003-04 Financial Period*, CBAA, pp. 1-14.

19 McNair Ingenuity Research (2006) *Community Radio National Listener Survey – Summary Report of Findings*, CBAA, p. 4.

20 McNair Ingenuity Research (2006) *Community Radio National Listener Survey – Summary Report of Findings*, CBAA, p. 4.

21 McNair Ingenuity Research (2006) *Community Radio National Listener Survey – Summary Report of Findings*, CBAA, p. 5.

ABC/SBS radio. In other words, about 1 in 6 community radio listeners are exclusive listeners.

- The key reason for listening to community radio is that they have 'local information/local news'. This is the main reason given by women, people in the 25-54 age group and most occupation categories.
- For non-metro listeners, 'local information/local news' is easily the most cited reason, followed by other statements with a 'local' emphasis. For metropolitan listeners and men, 'specialist music or information programs' and 'they play Australian music/support local artists' are the most frequent reasons.
- People aged 15-24 listen to community radio most frequently for 'Australian music/local artists and people aged 55+ for 'specialist music or information programs'.
- Listeners to community radio in an average week spend 7.5 hours listening to community radio per week. Older people aged 55+ listen the most to community radio, averaging 10.4 hours per week. People aged 15-24 average 5.3 hours per week, and people aged 25-54 average almost 7 hours per week.
- Community radio draws its audience from a wide cross section of the community with at least 20% of most demographic groups tuning in to community radio during a typical week. For example, 27% of employed people and of students, and 27% of people whose annual gross income is over \$40,000, listen to community radio during a typical week. 28% of people who regularly speak a language other than English in their household, listen to community radio during a typical week.
- Looking at the demographic composition of the weekly community radio audience, 55% are men and 45% are women, 19% are aged 15-24, 28% aged 25-39 and 54% aged 40 or over. 42% are engaged in full-time work and 21% in part-time work. Comparisons of these percentages with the population are shown in the Fact Sheets later in this report, by States, cities and non-metro areas.
- The number of Australians aged 15+ listening to community radio in an average week has risen from 3,767,000 people (24%) in 2004 to 4,034,000 people (25%) in 2006 - an increase of 7% in the total number of people listening.
- The number of Australians aged 15+ listening to community radio in an average month has risen from 7,054,000 people (45%) in 2004 to 7,515,000 people (47%) in

2006 – an increase of 7% in the total number of people listening.<sup>22</sup>

## Community Media Matters: An Audience Study Of The Australian Community Broadcasting Sector<sup>23</sup>

3.28 This study is the second completed by the team of Associate Professor Michael Meadows, Dr Susan Forde, Dr Jacqui Ewart and Dr Kerrie Foxwell from Griffith University.

3.29 Meadows et al. stated that the study is:

... an audience-based study which has gathered qualitative data on community broadcasting audiences ... [and] is designed to complement the quantitative study of community broadcasting audiences completed by McNair Ingenuity (2004) and also to complete the circle of community radio stations and their audiences initiated by the first Griffith University study.<sup>24</sup>

3.30 The report explores:

... why a significant and increasing number of Australians listen to community radio and/or watch community television, what they value about it, and how it meets their needs.<sup>25</sup>

3.31 The report outlined the methodology used for the study:

The data on which our findings are based has emerged from a series of audience focus groups, interviews with individual listeners/viewers and station managers, and representatives of community groups accessing community radio and television.<sup>26</sup>

3.32 The report's summary outlined some of the study's key findings:

- For metropolitan and regional radio stations, audience members primarily 'tune in' for these principal reasons:

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22 McNair Ingenuity Research (2006) *Community Radio National Listener Survey – Summary Report of Findings*, CBAA, pp. 8-9.

23 Meadows, M., Forde, S., Ewart, J. & Foxwell, K. (2007) *Community Media Matters: An Audience Study Of The Australian Community Broadcasting Sector*, Griffith University.

24 Meadows, Forde, Ewart & Foxwell, *submission no. 89*, p. 3.

25 Meadows, M., Forde, S., Ewart, J. & Foxwell, K. (2007) *Community Media Matters: An Audience Study Of The Australian Community Broadcasting Sector*, Griffith University, p. [5].

26 Meadows, M., Forde, S., Ewart, J. & Foxwell, K. (2007) *Community Media Matters: An Audience Study Of The Australian Community Broadcasting Sector*, Griffith University, p. [5].

- ⇒ They perceive community radio to be accessible and approachable
- ⇒ They like the laid back, 'ordinary person' station presentation style
- ⇒ They want to access local news and information
- ⇒ They want access to specialist and diverse music formats
- ⇒ They appreciate the diversity represented in station programming.
- A wide range of audiences access Indigenous radio and television across Australia with both Indigenous and non-Indigenous listeners and viewers identifying the following as key attractions:
  - ⇒ They feel Indigenous media offer an essential service to communities and play a central organising role in community life
  - ⇒ Indigenous media help people to maintain social networks
  - ⇒ Indigenous media are playing a strong educative role in communities, particularly for young people
  - ⇒ They offer an alternative source of news and information about the community which avoids stereotyping of Indigenous people and issues
  - ⇒ They are helping to break down stereotypes about Indigenous people for the non-Indigenous community, thus playing an important role in cross-cultural dialogue
  - ⇒ The stations offer a crucial medium for specialist music and dance.
- Audiences listening to specialist ethnic programming on generalist community radio stations or full-time ethnic community radio stations are tuning in because:
  - ⇒ Station programming plays a central role in maintaining culture and language
  - ⇒ Programs help them to maintain community connections and networks
  - ⇒ Stations enable them to hear specialist ethnic music unavailable through other media
  - ⇒ They want to hear local community news and gossip
  - ⇒ They want to hear news and information relevant to their lives in Australia, from their home countries, and from neighbouring countries/regions.

- Audiences for community television watch because:
  - ⇒ They want to access alternative programming than that offered by commercial and national public television stations (ABC and SBS)
  - ⇒ They want to access information that they feel is unavailable anywhere else
  - ⇒ They want to receive this information in non-traditional formats
  - ⇒ They like the diversity of programming, particularly from niche interest groups
  - ⇒ A significant number of viewers of community television are frustrated by poor or unreliable broadcast signal reception.<sup>27</sup>

## Community broadcasting ethos

- 3.33 The inquiry was told of a particular community broadcasting ethos that unites the diversity of broadcasters. CBF and other submissions described the role of community broadcasting and its key features.
- 3.34 CBF stated that community broadcasting is a very different kind of media:

It is a diverse media sector comprised of hundreds of independent media organisations united by a common philosophy. The essential principles of the community broadcasting creed are Access, Diversity, Independence and Localism. In recent years they have been expressed and clarified in the community radio and television Codes of Practice. These principles and their practical expression in the daily operation of community broadcasting organisations distinguish the community broadcasting sector from other broadcast media and highlight many aspects of community broadcasting's value to our society.<sup>28</sup>

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27 Meadows, M., Forde, S., Ewart, J. & Foxwell, K. (2007) *Community Media Matters: An Audience Study Of The Australian Community Broadcasting Sector*, Griffith University, pp. [5-6].

28 CBF, *submission no. 114*, p. 6.

3.35 CBF discussed access to community broadcasting:

Community broadcasting provides all Australians with the opportunity to access the airwaves. It has a particular commitment and responsibility to providing access to minority groups that are unable to effectively access other media. Active participation in media production, and in the governance of independent, community owned and operated media organisations, is a necessary corollary of being an accessible media ... the degree of access offered contrasts the community broadcasting sector strongly against most other Australian media where program content, production and presentation are comparatively tightly controlled.<sup>29</sup>

3.36 CBF added:

The community broadcasting sector's level of access for all Australians makes it unique within our media. It adds an extra dimension of Australian identity and culture that would otherwise not exist simply by involving ordinary Australians from all walks of life in the operation of broadcast media.<sup>30</sup>

3.37 CBF discussed diversity, a key feature of community broadcasting:

Community broadcasting is committed to the principle of Diversity in many manifestations. The sector itself is highly heterogenous in its structure, comprised of many hundreds of individual media organisations. Services are either generalist in nature - committed to meeting the diverse programming needs of a specific geographic area, or specialist in their focus - committed to the diverse programming needs of a particular community of interest. Adherence to diversity as a programming principle necessarily turns the central commercial media programming strategy on its head.<sup>31</sup>

3.38 CBF added:

Community broadcasting does not seek to aggregate and hold mass audiences with particular demographic and socio-economic profiles for delivery to advertisers. It seeks to meet the needs of minority audiences not adequately catered for by other media and accordingly builds its audience from many

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29 CBF, *submission no. 114*, p. 6.

30 CBF, *submission no. 114*, p. 7.

31 CBF, *submission no. 114*, p. 7.

smaller niche audiences ... a further manifestation of Diversity is the sector's strong commitment to tolerance, greater understanding and acceptance of difference, and the promotion of harmony within Australian society.<sup>32</sup>

3.39 CBF discussed the importance of independence in community broadcasting:

... the community broadcasting sector is comprised of hundreds of independent community-owned media organisations. Each station is a voice for its community. Each service provides another source of information and opinion for its community. Each service is a means of stimulating community engagement in the debates and dialogues that allow that community to define itself as a community.<sup>33</sup>

3.40 CBF elaborated, discussing the issue of media ownership:

Australia has one of the highest concentrations of media ownership and control in the world. That trend seems likely to continue. By the number of separate services operating, community broadcasting now forms Australia's largest media sector. Through its sheer size and independent structure the community broadcasting sector makes a significant contribution to the level of diversity in ownership and control of Australian media.<sup>34</sup>

3.41 CBF discussed the significance of community broadcasters contributing to local communities:

Community broadcasting organisations, both general and specialist in nature, serve the needs of local audiences. They are local media closely bound to the communities in which they operate. While the sector promotes the free exchange of specialist programs as the most cost-effective means of augmenting local programming, the great majority of all community broadcasting programming is produced within the communities to which it is broadcast.<sup>35</sup>

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32 CBF, *submission no. 114*, p. 7.

33 CBF, *submission no. 114*, p. 8.

34 CBF, *submission no. 114*, p. 8.

35 CBF, *submission no. 114*, p. 8.

3.42 CBF elaborated on localism:

At a time when commercial media is rapidly being globalised, community media is moving in the opposite direction. As greater networking draws media resources away from rural and regional areas across our country, community broadcasting's role within those local communities is broadening and increasing in value. Many non-metropolitan community radio services are already the only local media outlet in their area ... recent national audience research suggests that community broadcasters are playing an increasingly important cultural role within their communities both in maintaining and developing both a sense of local identity, and Australian identity and character, in media.<sup>36</sup>

3.43 Mr Vincent O'Donnell MA, a community broadcaster associated with Independent Media Foundation Inc. and the radio program Arts Alive also discussed independence and localism:

... while retail sources of news and information, especially from overseas, have diversified, reliable wholesale sources of Australian news and information, capable of authentication, have not increased. If anything, with the mergers and take-overs of the past two decades, the numbers of competing news and information sources has contracted ... increasingly too, the retail news and information sources are networked: be it radio or television ...<sup>37</sup>

3.44 Mr O'Donnell added:

Community owned and controlled media will assume a more crucial role as a source of news and information for the community as Australia's commercial media amalgamate and globalise ... in such a circumstance, community media and, in particular, the national community satellite radio service, assumes a social and political importance as a diversified, authentic and independent source for Australian citizens.<sup>38</sup>

3.45 Sunraysia Community Radio Association, operating as 3HOT FM in Mildura, Victoria, emphasised the importance of local community broadcasters:

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36 CBF, *submission no. 114*, p. 8.

37 Vincent O'Donnell, *submission no. 34*, p. 2.

38 Vincent O'Donnell, *submission no. 34*, pp. 1-2.



Regardless of what commercial radio says and what the ABC say they do, the only broadcasting sector which provides LIVE, LOCAL programs seven days a week in most regional centres is the COMMUNITY BROADCASTING SECTOR ... commercial radio and the ABC can use all the fancy language it can think of and twist words to suit, but when it comes to live presenters at ground level – where the storms are, where the action is outside 9 to 5 and at weekends, COMMUNITY RADIO STATIONS are there.<sup>39</sup>

3.46 Sunraysia Community Radio Association added:

They might be staffed by volunteers, but they are on the job (unpaid) seven days a week and able to respond immediately to a call for localism, whether it is a lost dog or cat, or a cancellation of a sporting event because of rain.

3.47 Community Radio Coraki discussed localism and its opposition to networking:

[networking] excludes local access ... witness the JJJ network. It is devoid of local input ... emergencies such as flooding exposes the inadequacies of networks. The two local commercial stations are reluctant, especially on weekends and overnight, to broadcast emergency information. Emergency services, such as the SES, are forced to ring 2SM Sydney and beg for coverage of an emergency ... networking in the above sense flies in the face of the spirit of community broadcasting because it significantly reduces local focus and access.<sup>40</sup>

## Volunteers

3.48 A key feature of community broadcasting ethos is the commitment of volunteers.

3.49 CBAA discussed the number of volunteers in the sector and the contribution they make:

The community broadcasting sector is sustained by the unpaid labour of more than 20,500 volunteers annually. In fact, 99 percent of stations have at least one volunteer and a small number have in excess of 400. Research conducted by

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39 Sunraysia Community Radio Association, *submission no. 96*, p. 8.

40 Community Radio Coraki, *submission no. 22*, pp. 5-6.

Griffith University indicates that people volunteering at community stations work at least two and half times as many hours as volunteers in other areas and contribute more than \$145 million in unpaid work each year ... volunteers are involved in every aspect of station operations, from management and on-air presentation, to administration and technical support.<sup>41</sup>

3.50 Many submissions to the inquiry indicated that their stations relied heavily on volunteers. Some stations have no paid staff but do pay particular contractors for professional technical services, or pay a commission to staff responsible for securing sponsorship.

3.51 4BAY FM stated that it has:

... no paid staff and all operational tasks are carried out by a broadcast team of volunteers who accept annual contracts to perform jobs of greater responsibility, e.g. Program Manager, Production Coordinator, Administrator, Admin Assistant, Skills Trainers.<sup>42</sup>

3.52 Rainbow FM stated that:

No full time paid staff are employed at the station, however the Sponsorship Manager and 2 of his assistants are paid a commission on sales.<sup>43</sup>

3.53 Yarra Valley FM stated:

All our presenters and support people are volunteers. We have no paid staff. We do engage contractors from time to time for maintenance and specialised tasks. Our sponsorship co-ordinator receives a commission on receipt of sponsorship income. However, all our programs, management and administration is performed by volunteers. Our volunteers come from a diverse background with an age range from mid teens to the 80s. Nearly half our volunteers are women.<sup>44</sup>

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41 CBAA, *submission no. 61*, p. 10.

42 4BAY FM, *submission no. 11*, p. 1.

43 Rainbow FM, *submission no. 18*, p. 2.

44 Yarra Valley FM, *submission no. 55*, p. 1.

3.54 Vincent O'Donnell suggested that volunteer workers in the community sector have time to offer for at least these reasons:

- They are retired and have much discretionary time in addition to recreational time, and have some security of income.
- They are unemployed and have much discretionary time in addition to recreational time, and may be in receipt of benefits. One might include 'work for the dole' recipients here.
- They are students or others building entry level experience and skills with the hope of forging a professional career in the media. For them, volunteering often comes at the cost of forgone income but, for some, it is an investment in their future career'.
- They are employed in the media generally or the community sector in particular and volunteer either some of their paid time and/or recreational time to serve the sector outside the specific remit of their employment.<sup>45</sup>

## Peak bodies

3.55 CBAA is the peak body for community radio and television stations and provides:

... leadership, advocacy and support for our members to actively provide independent broadcasting services and to build and strengthen local communities. Together with other sector organisations, we make representations to the Government and the regulators on behalf of our membership.

3.56 CBAA also stated that there are six key community broadcasting membership organisations, including:

- Australian Indigenous Communications Association (AICA)
- National Ethnic & Multicultural Broadcasters Council (NEMBC)
- RPH Australia (RPHA)
- Indigenous Remote Communications Association (IRCA)
- Association of Christian Broadcasters (ACB).

3.57 CBF discussed its role in the sector:

[CBF] is the community broadcasting sector's independent non-profit funding agency. Its core purpose is to solicit funds

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45 Vincent O'Donnell, *submission no. 34*, p. 3.

and to disburse such funds for the maintenance and development of the community broadcasting sector in an ethical and transparent manner.<sup>46</sup>

## Programming

3.58 Many submissions to the inquiry discussed the widely varied station programming that meets the needs of particular communities.

3.59 A wealth of information regarding content and programming that reflect the character of Australia and its cultural diversity was provided in the submissions. Some examples from those submissions are detailed below.

3.60 The ACT Government stated:

Community radio complements commercial radio by broadcasting specialist music genres, spoken word programs relating to the arts, and by consciously aiming to showcase and promote local talent.<sup>47</sup>

3.61 Lismore's 2NCR discussed its range of programming:

We offer a diverse range of musical genres and formats including country, jazz, blues, heavy metal, punk, golden memories, indigenous, world music, rock music, pop music, community issues, political issues, religious programming and ethnic language shows, much of which is not available on any other local radio station.<sup>48</sup>

3.62 Melbourne's 3CR discussed some of its special programming events, including:

- Live broadcasts from Victorian prisons during NAIDOC week which focus on bringing the voices of indigenous prison inmates to the broader community ...
- Live broadcasts for events such as Survival Day (January 26), International Women's Day (March 8), May Day (May 1), Hiroshima Day (August 6) and Refugee Week (October).<sup>49</sup>

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46 CBF, *submission no. 114*, p. 4.

47 ACT Government, *submission no. 122*, p. 1.

48 2NCR, *submission no. 127*, p. 2.

49 3CR, *submission no. 26*, pp. 2-3.

3.63 Melbourne's 3CR also provided some examples of programs that serve a particular community of interest:

- Radio Mama – focus on issues facing mothers from all walks of life
- Marngrook Aboriginal Football Show – Australian rules focusing on Indigenous players and issues
- Let the Bands Play – military, brass and concert band music from around the world.<sup>50</sup>

3.64 Melbourne's Student Youth Network (SYN) discussed the importance of youth programming and stated that it has become:

... a dynamic radio station providing unparalleled access for young people to participate in creating their own media ... The core innovation is youth participation where the station is operated by young people for the youth community/communities.<sup>51</sup>

3.65 Melbourne's 3RRR discussed some of its programming:

Specialist music shows run the gamut of all forms of contemporary music with 5 specialist Australian music shows and everything from folk, metal, blues, hip hop, reggae, country, beats, funk, jazz, electronic and rock.<sup>52</sup>

3.66 PMBA discussed the music programs it features and their promotion of local music:

We have specialist programs that focus on specific genres (hip hop, hardcore, reggae, folk, blues, jazz, metal, punk, rock & roll, hillbilly, yodel etc), often presented by musicians ... we have provided a place where local musicians can come to speak about and play their music. Many have been able to play live to air, providing the opportunity to have a recording in our library and to have a copy for themselves.<sup>53</sup>

3.67 The Phonographic Performance Company of Australia discussed the contribution of community broadcasting to the development and promotion of Australian music:

Many community radio broadcasters play a much wider variety of Australian music than is typically heard on

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50 3CR, *submission no. 26*, p. 3.

51 SYN, *submission no. 126*, p. 3.

52 3RRR, *submission no. 110*, p. 7.

53 PMBA, *submission no. 121*, p. 2.

mainstream commercial radio networks. As such, for many Australian recording artists, the community radio sector is an extremely important medium for the exposure of their music to the general public. As an example of the importance of the sector to Australian music industry, we are aware that the Sydney community broadcaster FBi has a policy of playing at least 50% Australian music (with half of that amount being recordings by artists from the greater Sydney area).<sup>54</sup>

3.68 Melbourne's 3GDR discussed its audience and programming:

3GDR was formed with the intention of providing the ageing population with the style of radio programming that was familiar to them during their prime years when they were living more functional lives in the community. 3GDR combines information, health and other community awareness programs, with a music and radio style that is reminiscent of the earlier years of radio in Australia and one that the elderly can relate to. The on-air slogan "music and radio as it used to be" sums up the genre that 3GDR presents to its target audience.<sup>55</sup>

3.69 ACB stated that Christian stations have the following common elements in their content and programming:

- positive family values
- programming serving the Christian community which also can be listened to by non-Christians
- alternative opinions reflecting a Christian world view
- an emphasis on programming for the whole person, including spiritual values
- campaigns to assist and address recognised social problems such as drug and substance abuse, breakdown of the family unity and promotion of social justice.<sup>56</sup>

3.70 ACB added that Christian programming also promotes and fosters the development of the Christian music industry, the fastest growing genre of music in the world.<sup>57</sup>

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54 PPCA, *submission no. 91*, pp. 1-2.

55 3GDR, *submission no. 68*, p. 4.

56 ACB, *submission no. 106*, p. 12.

57 ACB, *submission no. 106*, p. 12.

3.71 AFMN discussed its programming of Australian music:

Stations in the fine music network broadcast a minimum of 10% of local (Australian) classical music content by performer, or composer. They encourage and emphasise the importance of local talent and launch new local CDs on air and interview participating artists. Most stations exceed the requirement and regularly exceed the 25% quota established for other music genres.<sup>58</sup>

3.72 Brisbane's 4MBS is a classical music and jazz community broadcaster that has:

... actively sought new and innovative ways to engage the community and support Australian but more particularly Queensland classical and jazz musicians – as part of our commitment to our local community. This strong focus on our local fine music scene is not possible for the national ABC fine music service.<sup>59</sup>

## Identified groups

3.73 There are some groups in the community broadcasting sector that have special needs and cultural sensitivities. These groups, Ethnic, Indigenous and RPH, have been identified by the Australian Government as a priority for specific funding.<sup>60</sup>

3.74 The following sections provide details on the character, content, audience, staff and funding for these groups.

## Indigenous

3.75 The Australian Indigenous Communication Association (AICA) described the importance of Indigenous community broadcasting:

For many Indigenous communities, the Indigenous community radio station is the primary broadcasting services, as it is through their local community station that they receive most of their news and information. In Northern Australia, Indigenous community radio provides a vital service to the communities they serve. In times of natural disasters they are

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58 AFMN, *submission no. 40*, p. 4.

59 4MBS, *submission no. 84*, p. 1.

60 CBF, *submission no. 114*, p. 22.

most likely the only local information provider. Indigenous media is indeed an “essential service”.<sup>61</sup>

- 3.76 AICA suggested that Indigenous community radio stations are:  
 ... a very cost-effective tool for self-management, capacity-building, and ... a very strong partner in their local community’s economic development.<sup>62</sup>
- 3.77 The Productivity Commission Inquiry into Broadcasting in 1999 recognised that broadcasting is important for Indigenous communities in that it provides ‘a primary level of service in remote areas and in local languages’. CBAA suggested that this acknowledged the unique role of Indigenous media in Australia and its primary objective to provide a first level of service for Indigenous people.<sup>63</sup>

#### Audience

- 3.78 AICA discussed Indigenous broadcasting and the audience it reaches:  
 Indigenous community broadcasting enables Aboriginal and Torres Strait Islander people to have access to culturally appropriate and regionally relevant broadcasting services in the same way the broader Australian public does. It also takes Indigenous voices, stories, music, viewpoints and information into communities throughout Australia.<sup>64</sup>
- 3.79 In addition, AICA suggested that Indigenous broadcasting also reaches non-Indigenous audiences.<sup>65</sup>
- 3.80 While conducting research into the community broadcasting sector, Associate Professor Michael Meadows and his colleagues from Griffith University found that:  
 For many non-Indigenous listeners, Indigenous broadcasting is providing a window to a culture and a part of the community that they previously could not or did not have access to.<sup>66</sup>

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61 AICA, *submission no. 72*, p. 2.

62 AICA, *submission no. 72*, p. 3.

63 CBAA, *submission no. 61*, p. 23.

64 AICA, *submission no. 72*, p. 4.

65 AICA, *submission no. 72*, p. 4.

66 Meadows, Forde, Ewart & Foxwell, *submission no. 89*, p. 20.



3.81 The South East Indigenous Media Association (SEIMA/3KND) suggested that stations like 3KND aim to teach and learn from the wider non-Indigenous community by providing

... a broadcasting service of deep and abiding interest to the wider non Indigenous community, with the goal of increasing mutual respect, learning and reconciliation between all Australians.<sup>67</sup>

### Stations

3.82 DCITA stated that there are:

... 106 Indigenous community radio stations, including 22 full-time, three aspirant and more than 80 remote Indigenous radio services.<sup>68</sup>

3.83 AICA provided details of Indigenous community broadcasters. They comprise:

- over 153 Indigenous community radio/television stations in remote areas, self-organised into eight regional networks, now known as Remote Indigenous Broadcasting Services (RIBS)
- five capital city community radio stations – Sydney, Brisbane, Darwin, Melbourne and Perth
- twenty Indigenous community radio stations based in regional centres such as Cairns, Alice Springs, Broome and Port Augusta to name a few.<sup>69</sup>

### Staff

3.84 AICA considers that there is an important distinction between Indigenous community broadcasters and ‘mainstream’ community broadcasters in that:

... for most Indigenous broadcasters, the income they derive from broadcasting is their only income, whereas, most other community broadcasters have other paid employment.<sup>70</sup>

3.85 CBAA explained further explained the distinction:

Non-Indigenous community broadcasting is sustained by more than 20,000 volunteers and grant funding is just part of

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67 SEIMA/3KND, *submission no. 113*, p. 2.

68 DCITA, *submission no. 75*, p. 2.

69 AICA, *submission no. 72*, p. 2.

70 AICA, *submission no. 72*, p. 2.

the mix with membership donations and sponsorship being key sources of revenue. For the Indigenous broadcasting sector the requirement is more for a fully professionalised service providing training and paid employment.<sup>71</sup>

3.86 AICA explained that Indigenous community broadcasters:

... provide many Indigenous people with part-time or full-time employment. These broadcasters have the potential to even further the line to do both social and economic development within any of our Indigenous communities where there are few or no employment opportunities for Indigenous Australians.<sup>72</sup>

3.87 AICA added that the stations:

... provide training in the range of broadcasting skills. They are an important element of the economic structure of Indigenous communities. The majority of Indigenous broadcasters are paid through the Community Development Employment Project (CDEP).<sup>73</sup>

3.88 SEIMA/3KND suggested that some stations such as 3KND do have a large volunteer component:

Our volunteers in the main are not the CDEP supported broadcasters. They are normally either working or receiving their own income from other sources. We do not have a CDEP program.<sup>74</sup>

## Content

3.89 AICA discussed the value of broadcasting in local languages:

... in traditional communities, where written English is sometimes a third or fourth language ... face-to-face communication in the local languages is most effective, and local radio broadcasts in local languages, containing relevant Indigenous news and music is most cost-effective.<sup>75</sup>

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71 CBAA, *submission no. 61*, p. 23.

72 AICA, *submission no. 72*, p. 2.

73 AICA, *submission no. 72*, p. 2.

74 SEIMA/3KND, *transcript of evidence 20 July 2006*, p. 80.

75 AICA, *submission no. 72*, p. 3.

3.90 SEIMA/3KND described program content at 3KND:

Indigenous programmers broadcast a variety of shows including specialist music programs, community issues and current affairs, political opinion, sports, health and arts programs ... the music broadcast on 3KND is predominantly by Indigenous artists.<sup>76</sup>

3.91 SEIMA/3KND added:

In the time we have been on the air 3knd has made a rich contribution to the community broadcasting sector in Melbourne. Our programs are produced and presented by community members and therefore provide an accurate reflection of the character and diversity within that community and the wider community.<sup>77</sup>

3.92 SEIMA/3KND also discussed its role in networking particular programs:

We have also produced and broadcast our own national talkback show, *Talkabout*, and music show *Songlines National*. We join the broadcast stations of 4K1G in Townsville, Radio Larrakia in Darwin, PK Media in Halls Creek, Koori Radio in Sydney, Radio Goolari in Western Australia and PY Media in South Australia, when they broadcast in their own language. While servicing our Melbourne based community is our priority, these 3KND initiated linkages forge communication and contact previously unavailable to the Melbourne Indigenous community.<sup>78</sup>

3.93 CAAMA discussed its station's programming:

Our radio station broadcasts 24 hours with Indigenous radio broadcasters, and we have a number of programs for all ages, ranging from the very young to the older generation. We do news on the hour every hour, so they know what Indigenous news is happening out there. We do a current affairs series and we also do a talkback series where we are dealing with politicians on a daily basis. That goes for one hour every day, so that people in the communities know what is going on.

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76 SEIMA/3KND, *submission no. 113*, p. 3.

77 SEIMA/3KND, *submission no. 113*, p. 3.

78 SEIMA/3KND, *transcript of evidence 20 July 2006*, p. 69.

They also have the opportunity to go on air and speak about the issues they have got.<sup>79</sup>

3.94 CAAMA added:

We play a number of different genres of music – country and western, blues, hip-hop. We also have a number of language programs. At the moment, we are broadcasting in about nine different languages.<sup>80</sup>

3.95 CAAMA discussed its health programs:

We have two [health] programs a day. One is the *Livewire* program in which we interview people from all around Australia on what is happening with regard to health, petrol sniffing or alcohol ... every day that goes to air. We also have talkback, so everyone knows what is going on within politics and how that is being addressed. Every Friday we have *A Current Affair*, which deals with all the social problems. On Friday nights, Saturdays and Sundays we broadcast the football live. We are trying to promote healthy sport. It is just local.<sup>81</sup>

3.96 CAAMA explained how it operates as a hub, providing programming to other stations:

... we are a hub that provides technical and training support, but also a hub that provides a lot of programming to other radio stations throughout Australia so they can operate longer hours. Not all of them are funded to employ a large number of staff, so they take a lot of our programming – our talkback programs, our *Livewire* program, our news and current affairs.<sup>82</sup>

3.97 CAAMA further explained:

We give people out in the communities – there are about six who participate – an opportunity to broadcast live on CAAMA Radio from 2 pm to 4 pm every day. We switch straight to a community that has a RIBS unit, and they go live from their studios on to CAAMA Radio.<sup>83</sup>

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79 CAAMA, *transcript of evidence 21 July 2006*, p. 2.

80 CAAMA, *transcript of evidence 21 July 2006*, p. 2.

81 CAAMA, *transcript of evidence 21 July 2006*, p. 11.

82 CAAMA, *transcript of evidence 21 July 2006*, p. 3.

83 CAAMA, *transcript of evidence 21 July 2006*, p. 2.

3.98 The National Indigenous Radio Service Limited (NIRS) is a national service provided from a hub station in Brisbane. NIRS explained its operations:

It primarily provides a bed program to Indigenous media organisations that don't have the staffing or capital requirements to provide 24-hour high quality broadcasting to their audience. NIRS supplies high quality entertainment and important information to all members who then retransmit the service when relevant.<sup>84</sup>

3.99 NIRS explained how its service is utilised by different stations:

At one end of this scale NIRS enables aspirant and remote area broadcasters to provide relevant Indigenous broadcasting 24 hours a day to their community, with the opportunity to "window" local programming as each community desires ... for broadcasters who meet the licensing and equipment requirements for a full time service, but lack the funds or resources to provide a full 24-hour service, NIRS will enable them to fill any holes with its continuous programming.<sup>85</sup>

3.100 NIRS explained that its service:

... is received by over 100 Broadcasting to Remote Indigenous Broadcasting Services, (RIBS), 50 Indigenous Radio Stations and 40 Community Radio Stations.<sup>86</sup>

3.101 NIRS added that it has a unique ability to reach a potential audience of almost four million people nationwide.<sup>87</sup>

3.102 NIRS discussed the importance of local stations and explained how its service contributes to the programming of those stations:

NIRS is not to be seen as an alternative to regional broadcasting, but rather as a supplement. While NIRS can provide high quality relevant programs, especially on a National perspective, it can never provide the service supplied by local broadcasters who know their local audience best. With this in mind, NIRS is importantly a tool for which

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84 NIRS, *submission no. 19*, p. 1.

85 NIRS, *submission no. 19*, p. 1.

86 NIRS, *submission no. 19*, p. 2.

87 NIRS, *submission no. 19*, p. 2.

local broadcasters can tap into and utilise to compliment their existing service.<sup>88</sup>

3.103 NIRS outlined its programming content:

NIRS is primarily a bed program with a large percentage entertainment content in the form of music. At any specified time (depending on current affairs and information programs) you can access the largest range of indigenous Australian music, both traditional and contemporary, as well as the best in Australian contemporary music. The music philosophy behind the NIRS concentrates solely on Australian content.

...

Around this music bed are based national programming in areas such as health, education, talkback, special event of Indigenous importance, various governmental department updates, and issues relevant to Indigenous Australians.

...

Other programming includes regional roundups from all over the country, sporting events and special music and festival events. A monthly program guide is supplied to members for their information.<sup>89</sup>

3.104 CBAA discussed Indigenous content produced by community radio stations:

In 2002-2003, 37 per cent of all community broadcasting stations aired programs aimed at an Indigenous audience, broadcasting a total of 1,602 hours of Indigenous programming. This is in addition to the programming provided by the 76 Indigenous Remote licensees.<sup>90</sup>

## Funding

3.105 DCITA stated that Indigenous community radio broadcasting received the following core funding:

- \$655 254 (plus \$65 525 GST) in 2005-06<sup>91</sup>

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88 NIRS, *submission no. 19*, p. 2.

89 NIRS, *submission no. 19*, p. 2.

90 CBAA, *submission no. 61*, p. 23.

91 DCITA, *submission no. 75*, p. 4.

- \$670 722 (plus \$67 072 GST) in 2006-07.<sup>92</sup>

3.106 DCITA also discussed other funding for Indigenous community broadcasting:

From time to time the Government provides funding for one-off projects. For example, on 5 April 2004 the Minister announced \$2 million in funding to provide additional television transmitters at Remote Indigenous Broadcasting Services (RIBS) sites across remote Australia. This funding was provided to the CBF to administer the project.<sup>93</sup>

3.107 DCITA explained that it provides separate funding under the Indigenous Broadcasting Program:

The Government also provides \$13.3 million through direct grants to Indigenous broadcasting organisations under the Indigenous Broadcasting Program (IBP). This funding was transferred from ATSIIS to DCITA in July 2004. The IBP provides funding support for Indigenous organisations that hold a community broadcasting licence under the Broadcasting Services Act 1992. It also contributes towards the ongoing operations of peak Indigenous media bodies, the satellite delivery of networked Indigenous radio programming, and some Indigenous radio content producers.<sup>94</sup>

3.108 DCITA added that the budget for 2006-07 is \$13.7 million, and outlined the breakdown of funding for the Indigenous Broadcasting Program:

24 radio stations are funded directly through IBP, 20 of which are regionally based and receive over 80% of IBP funding that goes directly to Indigenous stations. The remaining IBP funds are allocated to Imparja; [seven] Remote Indigenous Media Organisations (RIMOS), who provide coordination, technical assistance and training services to Remote Indigenous Broadcasting Services (RIBS); [two] Peak Bodies, who provide representation for Indigenous Media and Broadcasting organisations and [one] organisation providing accredited training in broadcasting.<sup>95</sup>

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92 DCITA, *submission no. 75.3*, p. 1.

93 DCITA, *submission no. 75*, p. 5.

94 DCITA, *submission no. 75*, p. 5.

95 DCITA, *submission no. 75.1*, p. 10.

## Ethnic and multicultural

### 3.109 NEMBC discussed the beginnings of ethnic broadcasting in Australia:

From its beginnings in the 1970s the ethnic community radio sector has given a voice to marginalized groups in the Australian community. For ethnic radio, this meant a large and diverse European community that had arrived after World War II. It also included the beginnings of large scale Asian migration in aftermath of the Vietnam War. In doing that ethnic community radio became the public manifestation of the social policy of multiculturalism. It demonstrated that recognizing a diversity of cultures is not necessarily synonymous with ghettoization. Inclusiveness and tolerance allowed all members of society access to opportunity.<sup>96</sup>

### 3.110 The Department of Immigration and Multicultural Affairs (DIMA) stated that:

... community ethnic broadcasting has an important role in building social cohesion through linking Australians to local and national news, perspectives and events through Australia-focused non-English broadcasting.<sup>97</sup>

## Audience

### 3.111 The Multicultural Community Radio Association (MCRA), broadcasting as Radio2000 in Sydney, stated that the target audience for ethnic broadcasters is:

... both the old, new and emerging ethnic communities who speak languages other than English (16.3% of NSW population 1996 Census).<sup>98</sup>

### 3.112 NEMBC stated that the ethnic radio sector now broadcasts over 95 languages from 125 stations throughout Australia.<sup>99</sup>

### 3.113 NEMBC added that the capital city full-time ethnic stations are successful in servicing large diverse audiences.<sup>100</sup>

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96 NEMBC, *submission no. 108*, p. 8.

97 DIMA, *submission no. 93*, p. 2.

98 MRCA/Radio2000, *submission no. 64*, p. 2.

99 NEMBC, *submission no. 108*, p. 8.

100 NEMBC, *submission no. 108*, p. 12.



- 3.114 The Ethnic Broadcasters' Council (EBC), broadcasting as 1CMS in Canberra, discussed differences in its audience:

We reach both longer established and emerging communities in the ACT and region. Each ethnic community has its own listeners profile, depending on the levels of English spoken in the particular community; the length of residence in Australia; the general age structure; and access to alternative sources of information.<sup>101</sup>

### Stations

- 3.115 NEMBC provided an overview of ethnic stations:

Currently there are seven major fulltime stations broadcasting exclusively in languages other than English ... another 88 stations carry a diverse mix of ethnic language as well as English language programming.<sup>102</sup>

- 3.116 CBAA provided details on ethnic stations:

Stations that hold full-time ethnic/multicultural broadcasting licences are 2000 Sydney, 3ZZZ Melbourne, 4EB Brisbane, 5EBI Adelaide, 6EBA Perth and 1CMS Canberra. However, a station does not have to have a dedicated ethnic focus to broadcast ethnic programming. In fact, 47 percent of [community] stations broadcast 2,125 hours weekly of programming aimed at people from non-English speaking backgrounds every week.<sup>103</sup>

### Staff

- 3.117 As with many community broadcasters, ethnic stations rely heavily on volunteers.

- 3.118 The Ethnic Public Broadcasting Association of Victoria (EPBAV), broadcasting as 3ZZZ in Melbourne discussed its volunteer base:

more than 400 volunteers freely giving time to research, prepare and deliver radio programs ... community radio volunteers are passionate about their stations. It is difficult to estimate the number of volunteer hours and to put a dollar figure on the worth of salary that volunteers forgo. For the

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101 EBC/1CMS, *submission no. 83*, p. 1.

102 NEMBC, *submission no. 108*, p. 8.

103 CBAA, *submission no. 61*, p. 24.

150 hours of locally produced programming each week at 3ZZZ there are an average of 3 volunteers putting together the program, each spending on average 4 hours per broadcast hour – this would equal 1800 hours each week, or 93 600 hours each year.<sup>104</sup>

3.119 MCRA/Radio2000 has a similar volunteer base:

More than 300 volunteer broadcasters have dedicated their time to produce and broadcast programs to their respective communities throughout the year ... a significant portion of the volunteer broadcasters is from the general youth population of the community.<sup>105</sup>

3.120 EBC/1CMS stated that:

Programs are typically produced and presented by volunteers who are required to demonstrate that they are responsive to their respective listening audiences.<sup>106</sup>

3.121 The Multicultural Radio And Television Association of WA (MRTAWA), broadcasting as 6EBA in Perth, acknowledged the contribution of its volunteers:

There are approximately 300 volunteers who assist with the numerous radio programmes broadcast daily from 6EBA, and represent all ages, both genders, and who broadcast their own language programmes. 6EBA recognises and appreciates the work volunteers do, not only in terms of programming, formatting and presentation of programmes, but also with regards to the tremendous cost saving to the station if they were paid.<sup>107</sup>

## Content

3.122 NEMBC provided an overview of ethnic broadcasting content:

There are around 4000 broadcasters involved in the delivery of settlement information, news, entertainment, music, language and cultural maintenance to their audiences. They

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104 EPBAV/3ZZZ, *submission no. 105*, pp. 6-7.

105 MRCA/Radio2000, *submission no. 64*, p. 2.

106 EBC/1CMS, *submission no. 83*, p. 1.

107 MRTAWA/6EBA, *submission no. 86*, p. 3.

continue to be one of the largest language workshops in Australia.<sup>108</sup>

3.123 CBF summarised ethnic program production in Australia:

... the community radio sector in 2004-05 produced 66,480 hours of locally relevant ethnic language programs in 97 languages used by 124 distinct ethnic/cultural groups located in over 750 distinct local ethnic communities in over seventy locations across Australia.<sup>109</sup>

3.124 CBAA discussed the role of community broadcasters for ethnic communities:

Ethnic community broadcasting stations and the NEMBC have also played a leading role in assisting new, emerging and refugee communities make the transition to Australian life – providing news, information and assistance by and for these communities in their own languages.<sup>110</sup>

3.125 DIMA added that:

Community broadcasting provides a valuable source of information for people settling in Australia. This can include information about services, Australian ways, and local migrant communities' experiences. It also provides a valuable link to existing community networks.<sup>111</sup>

3.126 EPBAV/3ZZZ explained that, in addition to providing essential services, its programs help the community to maintain cultures through:

- Music
- Stories
- Children's entertainment
- Language maintenance
- Folklore
- Oral History
- Literature & Poetry
- The Arts
- Festivals and community gatherings.<sup>112</sup>

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108 NEMBC, *submission no. 108*, p. 8.

109 CBF, *submission no. 114*, p. 30.

110 CBAA, *submission no. 61*, p. 24.

111 DIMA, *submission no. 93*, p. 3.

112 EPBAV/3ZZZ, *submission no. 105*, p. 11.

- 3.127 MRTAWA/6EBA features special programmes on:  
 ... youth, seniors and sport, including community organisations ... local news regarding community events, forthcoming elections, information about Australia's security ...<sup>113</sup>
- 3.128 Ethnic Broadcasting Association of Queensland, broadcasting as 4EB FM in Brisbane, stated that its programmes consist of:  
 ... local and international news, community announcements, settlement information, presentation of government and aid organisation information, music and cultural information, and interviews with government employees, experts and community leaders ... all programmes are produced locally and provide a service that contains specific local information that is very different from SBS, other local ethnic commercial media services, satellite services or internet services in people's first language.<sup>114</sup>
- 3.129 A substantial number of general community broadcasting stations broadcast a considerable amount of ethnic programming. Some examples are described below.
- 3.130 Radio 8CCC in Alice Springs outlined the programs it provides:  
 Currently we offer news and music programs in Latin American, French, Spanish, Filipino and Maori. Past programs have been produced in Italian, Dutch, Japanese and German. Most importantly, we have a flexible programming strategy which adjusts to the cultural mix in our transient population, and the availability and interest of volunteer ethnic broadcasters.<sup>115</sup>
- 3.131 Western Radio Broadcasters, broadcasting as Stereo 974 in Melbourne's western suburbs, discussed its ethnic programming:  
 ... we carry out a considerable aggregate of Vietnamese programs ... brought about by recognising an emerging community in the western suburbs of Melbourne. The Vietnamese community are great supporters of this radio

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113 MRTAWA/6EBA, *submission no. 86*, p. 4.

114 EBAQ/4EB, *submission no. 54*, p. 1.

115 Radio 8CCC, *submission no. 117*, p. 4.

station, and we believed are starved for information and entertainment.<sup>116</sup>

3.132 Western Radio Broadcasters added:

We are doing about 56 hours of ethnic broadcasting per week, predominantly between the hours of 8.30 in the morning through until six at night.<sup>117</sup>

3.133 Eastside Radio in inner Sydney has programs in the following languages:

Thai, Macedonian, Indian, Bengali, Vietnamese, Chinese, Mandarin and German.<sup>118</sup>

3.134 Voice FM in Ballarat discussed its ethnic programming:

We ... currently have 7 ethnic programs (Dutch, Filipino, German, Greek, Hindi, Italian and Japanese). We have had Chinese and French programs but the presenters for these programs recently moved from Ballarat. These programs will be filled as soon as new presenters become available. We have a Russian presenter currently training and have been approached by a potential Spanish presenter.<sup>119</sup>

3.135 World Music Radio suggested that some ethnic programming should reach a wider audience:

... although ethnic programs are much appreciated by the individual communities concerned, they are not able, by their very nature, to include the mainstream community ... what are urgently needed are community stations that will present popular music, folk music, as well as information from all cultures, **but in the English language**, much like SBS TV is doing. This would not only serve the people of the particular language/ethnic group from which the news/music comes, but would also cater to the English speaking population, as well [as] allowing all the other listeners from various cultural backgrounds to become familiar with each others music.<sup>120</sup>

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116 WRB/Stereo 974, *submission no. 21*, p. 3.

117 WRB/Stereo 974, *transcript of evidence 20 July 2006*, p. 56.

118 Eastside Radio, *submission no. 9*, p. 2.

119 Voice FM, *submission no. 78*, p. 1.

120 World Music radio, *submission no. 41*, p. 1.

## Funding

- 3.136 DCITA stated that ethnic community radio broadcasting received the following Australian Government funding for 2005-06:
- Core funding of \$1 552 550 (plus \$155 255 GST)
  - Targeted funding of \$1 133 347 (plus \$113 335 GST).<sup>121</sup>
- 3.137 For 2006-07, ethnic community radio broadcasting received the following Australian Government funding:
- Core funding of \$1 589 139 (plus \$158 914 GST)
  - Targeted funding of \$1 154 761 (plus \$115 476 GST).<sup>122</sup>
- 3.138 Income from different sources varies from station to station. EPBAV/3ZZZ described its major sources of income:
- membership fees and community donations (30% in 2004-2005)
  - sponsorship and production (on air announcements) (27% in 2004-2005)
  - grants from the Community Broadcasting Foundation (32% in 2004-2005).<sup>123</sup>

## Radio for the print handicapped

- 3.139 A unique service provided by community radio stations is a reading service for Australians with a print handicap.
- 3.140 RPH services are operated by dedicated RPH stations, and also provided to a lesser extent by other community stations.
- 3.141 CBAA discussed RPH services:

RPH fulfils an undeniably essential role for many in the community, not only for people with a print disability. People with arthritis, the elderly and people with mobility disabilities also use RPH. Additionally, some non-English speaking migrants use the service to practise their English.<sup>124</sup>

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121 DCITA, *submission no. 75*, p. 4.

122 DCITA, *submission no. 75.3*, p. 1.

123 EPBAV/3ZZZ, *submission no. 105*, p. 17.

124 CBAA, *submission no. 61*, p. 24.

3.142 CBAA also stated that:

RPH also contributes to the ability of visually impaired community members to take part in their local community, by offering volunteer opportunities and providing information about local events and news.<sup>125</sup>

### Audience

3.143 Vision Australia discussed the target audience for RPH services:

The community of interest for our radio service are people with a print disability. That is those people who for reasons such as vision loss, a physical disability inhibiting handling of the printed page or because a learning or language difficulty are unable to adequately access print. It is estimated that in the order of 17 % of the population have a print disability ... many others tune to RPH because it is convenient and its readings and other specialised information content are of interest.<sup>126</sup>

3.144 Sydney's Radio Reading Service (2RPH) also discussed the RPH audience:

The term print handicapped applies broadly to people who can't see, hold, or understand the printed word. The most obvious group is people who are blind or vision impaired. Others are people who are arthritic or quadriplegic (can't hold newspapers). Still others are people who are dyslexic, illiterate, or whose first language is not English. This list is not exhaustive.<sup>127</sup>

### Stations

3.145 There are 15 RPH stations in Australia. Eight of those stations, based in Victoria and southern NSW, are operated by Vision Australia.<sup>128</sup>

3.146 Sydney's 2RPH discussed the operation of the RPH peak body, RPH Australia:

We are a legal entity in our own right while at the same time being a member of the RPH Australia (RPHA) group. RPHA

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125 CBAA, *submission no. 61*, p. 24.

126 Vision Australia, *submission no. 107*, p. 7.

127 Sydney's Radio Reading Service – 2RPH, *submission no. 101*, p. 3.

128 Vision Australia, *submission no. 107*, p. 7.

is the national peak organisation of licensed RPH broadcasters and provides support to members through policy development and implementation, Government liaison and development and management of a range of national projects that benefit member organisations.<sup>129</sup>

- 3.147 A full account of the development of RPH services in Australia can be found on the RPHA website.<sup>130</sup>

### Staff

- 3.148 RPH services rely heavily on volunteers:

Vision Australia RPH is resourced by 800 volunteers comprising 450 for the Melbourne operation and around 50 at each of the seven regional stations. A staff team of five, and others from the organisation, provide infrastructure support in areas such as volunteer coordination, marketing and finance and administration.<sup>131</sup>

- 3.149 Sydney's 2RPH has only one full-time paid employee, the station manager. The station relies on a group about 250 volunteers to present on-air programming. The station also relies on a very small group of specialist volunteers that work on an almost full-time basis to train staff.<sup>132</sup>

### Content

- 3.150 Vision Australia discussed the content that its services provide to listeners:

Our role is to convey to our audience the content of the print media. We endeavour to communicate the character of Australia and cultural diversity as portrayed in newspapers, magazines, and other printed content to which other people have direct access.<sup>133</sup>

- 3.151 Vision Australia outlined RPH programming:

- readings from newspapers and other printed publications
- information from Government, disability and other community organisations of special relevance to various

129 Sydney's Radio Reading Service – 2RPH, *submission no. 101*, p. 3.

130 <http://www.rph.org.au/html/development.html>, accessed 23 March 2007.

131 Vision Australia, *submission no. 107*, p. 7.

132 Sydney's Radio Reading Service – 2RPH, *submission no. 101*, p. 10.

133 Vision Australia, *submission no. 107*, p. 8.



listener groups and not available through alternative electronic media

- other content of special interest to listener groups, such as audio description of events otherwise only available on television, including Wimbledon Tennis and Vision Australia Carols By Candlelight.<sup>134</sup>

3.152 Vision Australia provided a breakdown of programming from a typical day:

During the first part of the day there is concentration on in-depth readings of the news items of the day's newspapers. In the afternoon there is more attention given to feature items from newspapers and magazines. The evening programs give attention to comment and opinion from the papers as well as extensive book readings. Throughout the day and evening there are special interest information programs from Government, disability and other community organisations.<sup>135</sup>

3.153 Vision Australia also discussed regional station programming:

For up to three hours each day the regional stations break away from the network to broadcast local content. This includes extensive reading from the local publication such as The Border Mail through Albury RPH or Sunraysia Daily in Mildura. Attention is also given to local community information through reading and interviews with key individuals. During week day afternoons listeners in Melbourne can hear extensive readings from the suburban publications.<sup>136</sup>

## Funding

3.154 The annual operating cost of Vision Australia's RPH services is around \$500 000.<sup>137</sup>

3.155 Vision Australia explained that its major spending areas are:

- salaries
- communications links
- transmitter maintenance, operation and site rental

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134 Vision Australia, *submission no. 107*, p. 8.

135 Vision Australia, *submission no. 107*, p. 8.

136 Vision Australia, *submission no. 107*, p. 8.

137 Vision Australia, *submission no. 107*, p. 7.

- subscriptions to newspapers and other publications
    - printing.<sup>138</sup>
- 3.156 Vision Australia outlined its sources of revenue:
- program sponsorship – 40 per cent
  - individual and other donations – 35 per cent
  - Australian Government – 20 per cent
  - other Vision Australia sources – 5 per cent.<sup>139</sup>
- 3.157 Sydney’s 2RPH outlined its primary sources of funding:
- the Australian Government, through CBF, which provides an annual programming support grant and meets some electricity and program line costs
  - DCITA, which provides funding for Sydney transmitter costs
  - NSW Department of Ageing, Disability and Home Care for most operating costs
  - sponsorship
  - donations, bequests and fund raising activities.<sup>140</sup>

## Contribution to the economy

- 3.158 CBF suggested that the community broadcasting sector contributes significantly to the Australian economy. Based on the CBD survey data, the community broadcasting sector has an annual turnover in excess of \$69 million.<sup>141</sup>
- 3.159 CBF suggested that, according to ACMA, CBAA and CBF data, the sector is:
- ... driven by the collective energy and enthusiasm of over 23,000 volunteers and it employs more than 960 staff (both full-time and part-time).<sup>142</sup>

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138 Vision Australia, *submission no. 107*, p. 7.

139 Vision Australia, *submission no. 107*, p. 7.

140 Sydney’s Radio Reading Service – 2RPH, *submission no. 101*, p. 3.

141 CBF, *submission no. 114*, p. 10.

142 CBF, *submission no. 114*, p. 10.

- 3.160 Meadows et al. stated that community broadcasting volunteers are strongly committed, donating on average 10 hours of their time per week.<sup>143</sup>
- 3.161 CBF explained that the economic value of volunteer contribution is conservatively estimated at over \$4 million each week – almost \$212 million per annum.<sup>144</sup>
- 3.162 CBF stated that a more accurate estimate of the community broadcasting sector's economic value is in excess of \$280 million per annum. However, CBF added that financial measures cannot adequately indicate the sector's value to Australian society.<sup>145</sup>

## A training ground for the commercial sector

- 3.163 In addition to the services provided to local communities, the community broadcasting sector informally fills another highly role for Australian media.
- 3.164 CBAA stated that the community broadcasting sector must be acknowledged as a training ground for successive generations of media professionals.<sup>146</sup>
- 3.165 CBAA provided a list of people who have achieved recognition in national and commercial media sectors, and who began their media careers in the community broadcasting sector. This list is summarised in Table 3.1.
- 3.166 CBAA added:
- The national and commercial sectors have benefited from the sector's provision of an entry level training facility at no direct cost for many years.<sup>147</sup>

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143 Forde, S., Meadows, M. and Foxwell, K. (2002) *Culture Commitment Community – The Australian Community Radio Sector*, p. 28.

144 CBF, *submission no. 114*, p. 10.

145 CBF, *submission no. 114*, p. 10.

146 CBAA, *submission no. 61*, p. 28.

147 CBAA, *submission no. 61*, p. 29.

- 3.167 Open Spectrum Australia stated that community broadcasters have prepared talent and production crew for the commercial and national broadcasters:

Community broadcasting is the engine-house of the broadcasting industries. It is the major training ground for radio and television in Australia, teaching and nurturing new talent and production crew both informally and via its University partners. The sector has long been a content proving ground, nurturing programs and talent, including some of Australia's most recognisable names in entertainment and news.<sup>148</sup>

- 3.168 CBAA also stated that CTV is an important training ground for careers in the media industry and that many volunteers have gone on to work for the commercial and national networks.<sup>149</sup>

- 3.169 C31 Melbourne added:

Many people associate Rove McManus with community television, but the breadth of people trained in the sector is not widely recognized by the public. While there are a number of notable personalities on mainstream television and radio who have a background in the community sector, there are far more people behind the scenes who have also developed and honed their skills through their association with community television.<sup>150</sup>

- 3.170 Huon FM emphasised the sector's contribution:

I am aware that there have been suggestions of a cross-subsidy from commercial stations and the ABC to recognise the substantial contribution made by community radio stations to training people who are later employed by other broadcasting sectors. While such training may be regarded as an intangible it is nonetheless [a] significant contribution made by community broadcasters.<sup>151</sup>

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148 Open Spectrum Australia, *submission no. 56*, p. 5.

149 CBAA, *submission no. 61.1*, p. 9.

150 C31 Melbourne, *submission no. 102*, p. 10.

151 Huon FM, *submission no. 17*, p. 5.

Table 3.1 A training ground for the national and commercial sectors

<b>Name</b>	<b>Position</b>	<b>Started at</b>
<b>Journalism</b>		
Andrew Denton	Host, <i>Enough Rope</i>	2MCE
Liz Jackson	Host, <i>Four Corners</i>	2MCE, 2SER
Jessica Rowe	Host, <i>Today Show</i> , Nine	2MCE
Natasha Belling	Newsreader, Ten	2MCE
Fran Kelly	<i>Foreign Correspondent</i> , ABC	2XX
Ramona Koval	ABC Radio	3RRR
Sian Prior	ABC Radio	3RRR
Marian Wilkinson	Fairfax	4ZZZ
<b>Comedy</b>		
James O'Loghlin	Presenter, <i>Evenings</i> , ABC Radio	FBi
Brian Dawe	<i>7.30 Report</i> , ABC	3RRR
Grieg Pickhaver (HG Nelson)	Presenter, <i>The Dream</i>	3RRR
Coodabeen Champions	ABC Radio	3RRR
Merrick & Rosso	Nova breakfast, <i>Unplanned with Merrick &amp; Rosso</i> , Nine	3RRR
Santo Cilaurò	Working Dog Productions	3RRR
Richard Fidler	Ex-DAAS, ABC Head of Comedy	3WAY
Hamish & Andy	Fox FM	SYN
Rove McManus	Host, <i>Rove</i>	6RTR
<b>Television</b>		
Catriona Rowntree	Presenter, <i>Getaway</i> , Nine	2NSB
Fenella Kernebone	Presenter, <i>The Movie Show</i> , SBS	2SER
Jamie Leonarder	Presenter, <i>The Movie Show</i> , SBS	FBi
Kate Langbroek	Host, <i>The Panel</i> , Ten	3RRR
<b>Other radio</b>		
Robbie Buck	Presenter, <i>Home &amp; Hosed</i> , Triple J	2NCR, 2SER
Julie McCrossin	Presenter, <i>Life Matters</i> , Radio National	2SER
Richard Kingsmill	Presenter/Music Director, Triple J	2NUR, 2SER
Caroline Tran	Presenter, Triple J	2RES
Mick O'Regan	Presenter, <i>Media Report</i> , Radio National	2SER
<b>Writers</b>		
Helen Razer	Freelance journalist	2XX, 2SER
Sarah McDonald	Author, <i>Holy Cow</i>	2SER

Source CBA, submission no. 61, pp. 28-29.

3.171 Melbourne's 3CR, discussed its contribution to training in community broadcasting:

3CR has a strong history of accessible and professional radio training with approximately 80 people trained annually in:

- Specialist current affairs
- Digital audio production
- Outside broadcasting
- Sound engineering including a specialist program that trains young women.

In addition to the general radio training, over 30 people are annually trained in management and administration including reception skills, event management and volunteer coordination. In the station's 30-year history this equates to over 3000 volunteers being provided with training expertise and its affordability ensures accessibility to people on low-incomes.<sup>152</sup>

3.172 Gippsland FM looked for recognition for the training role undertaken by the community broadcasting sector:

The sector is also a training ground for national and commercial broadcasters. Whilst this may be recognised informally, there is no national recognition for the important role played by community media in developing the current and next generation of journalists for the electronic media.<sup>153</sup>

3.173 The ABC also acknowledged the important role that the community broadcasting sector plays:

... as an opportunity for individuals to test their interest in radio and/or television. Over the years, a significant number of talented people have come to the ABC from community broadcasting.<sup>154</sup>

3.174 AFMN recommended that:

... Government recognise the role played by community radio as a quality training ground for the industry in general and allocate funding to support day to day operations and

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152 3CR, *submission no. 26*, p. 2.

153 Gippsland FM, *submission no. 76*, p. 5.

154 ABC, *submission no. 7*, p. 1.

strengthen the professional management base of community radio.<sup>155</sup>

## Committee comment

- 3.175 The Committee recognises the breadth of the community broadcasting sector. The sector serves a vast number of local communities and provides services to people with special needs.
- 3.176 The Committee also acknowledges the incredible contribution made to local communities by more than 20 000 volunteers in the sector.
- 3.177 The Committee also recognises that the sector is a significant training ground for the national and commercial broadcasting sectors and feels that this role deserves much more recognition in Australia's wider media sector.

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155 AFMN, *submission no. 40*, p. 7.





## Regulatory issues in the community broadcasting sector

- 4.1 This chapter examines the major regulatory issues affecting the community broadcasting sector.
- 4.2 The chapter examines general licensing issues including licence allocation, licence breaches and complaints.
- 4.3 The chapter also examines the significant issue of sponsorship in the sector.

### Licensing

- 4.4 Many submissions raised licensing issues as a significant problem to be addressed by inquiry.
- 4.5 Some submissions claimed that community broadcasters have difficulty in interpreting regulations. The Northern Territory Department of Corporate and Information Services discussed difficulties broadcasters face regarding the interpretation of legislation:

The current legislation is complex for broadcasters to interpret. It is also open to subjective opinion and decision making ... interpretation of licence conditions and seeking opinions from the ACMA attracts a fee from those least likely to be able to afford it ... application [of the legislation] lacks consistency and is open to widely differing interpretations and applications.<sup>1</sup>

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1 Northern Territory Department of Corporate and Information Services, *submission no. 13*, p. 2.

## Transparency of decision making

4.6 Several submissions to the inquiry raised the issue of transparency of the regulator's decision making processes.

4.7 DIMA called for increased transparency in the licence allocation process:

The need for transparency and fairness in the allocation of licenses is illustrated by an incident in 2001 in relation to the allocation of three community licenses to serve Sydney by the Australian Broadcasting Authority. The decision to grant one of the licences to a particular Islamic charity was severely criticised as a political decision by a competing body which claimed broader community representation of mainstream Australian Muslims. Other groups were also not supportive of the decision. The licensee did, however, go on to provide successful programming. This case indicates that there are community sensitivities in this area and that there is a need for transparency of decision-making.<sup>2</sup>

4.8 CTV Perth also raised the issue of decision making transparency:

The process of the granting of the licences to local community televisions appears lacking the clear transparency and accountability in its decision making process.<sup>3</sup>

4.9 PCR FM suggested that ACMA may not be fully aware of how the sector functions. PCR-FM, through recent experience gained in particular court cases, suggested that ACMA's lack of understanding and appreciation of the fundamental principles pertaining to the sector has emerged.<sup>4</sup>

4.10 PCR FM also suggested that ACMA may not be completely objective in its decision making processes:

Documents acquired under the FOI reveal a subjective rationale having been applied to our specific case and demonstrate the dangers of allowing ACMA to remain unaccountable to anyone.<sup>5</sup>

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2 DIMA, *submission no. 93*, p. 4.

3 CTV Perth, *submission no. 99*, p. 11.

4 PCR FM, *submission no. 32*, p. 2.

5 PCR FM, *submission no. 32*, p. 2.

- 4.11 PCR FM suggested that correspondence received from the Minister for Communications, Information Technology and the Arts indicated a level of autonomy and unaccountability on the part of the ACMA. PCR FM explained:

The letters reflect a pro format response provided by ACMA to the Ministers' Offices and once again promote a notion of little accountability.<sup>6</sup>

- 4.12 PCR FM claimed that, in a new environment where boundaries between emerging and existing technologies may overlap, it becomes vital that the discretionary powers of ACMA be controlled without affecting its autonomy.<sup>7</sup>

- 4.13 PCR FM suggested that this could be achieved by giving CBAA or an equivalent body a greater co-regulatory role within the system applying to the community broadcasting sector. PCR FM described CBAA:

It is a peak organisation that understands the effects of modern technologies on the community radio sector, is answerable to its members, and above all is totally immersed in the values promulgated by its Code of Practice. The input of the CBAA must be formalised and more than just advisory or rhetorical.<sup>8</sup>

- 4.14 Several passionate submissions to the inquiry cited recent decisions regarding licence allocations as examples of poor ACMA decision making processes. For example, Doris Freris explained:

... I believe that a great injustice has been committed by the [ACMA]. They have committed this not just once but twice in the last three and a half years by licensing Radio Rhema Gosford. My impression is that this has been blatant discrimination against the migrant communities and PCR FM. I can only logically conclude that this has occurred because of corruption through the payment of either bribes, spiritual favour or promise or capitulation to foreign interests. It has not been for the building of harmonious communities or Australian equality.<sup>9</sup>

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6 PCR FM, *submission no. 32*, p. 2.

7 PCR FM, *submission no. 32*, p. 2.

8 PCR FM, *submission no. 32*, p. 2.

9 Doris Freris, *submission no. 10*, pp. 1-2.

- 4.15 Doris Freris also recommended that an independent person should rule on licensing disputes:

With regard to community radio and disputes either between the radio and the bureaucracy or the radio members and the ruling committee, I believe that some sort of ombudsman should be readily available to arbitrate in disputes. Obviously such a person would have to demonstrate a total lack of bias to anyone other than humanity.<sup>10</sup>

- 4.16 When asked if its licence allocation process is transparent and accountable, ACMA stated:

I believe so, yes. It is a public process. We put material out in public ... we give a report in which we set out our comparative assessment of the applicants ... it is publicly available ... they can get a statement of reasons from us.<sup>11</sup>

- 4.17 With regard to ACMA decisions, PCR-FM stated that it has:

... no right of appeal under the BSA 1992 thereby restricting any challenge to ACMA's reasons behind its decision to allocate a licence. The BSA gives wide discretionary powers to the Authority.<sup>12</sup>

- 4.18 When asked if there is a way that licence applicants can challenge an ACMA decision without having to resort to lengthy and expensive legal proceedings, the ACMA stated:

No; there is no appeal on the merits to the AAT [Administrative Appeals Tribunal]. There is only review on the law to the Federal Court under the ADJR Act [the *Administrative Decisions Judicial Review Act 1977*].<sup>13</sup>

- 4.19 ACMA clarified:

... the decisions to revoke a licence or impose a new condition are both appellable to the AAT, but the decision on [licence] allocations is not.<sup>14</sup>

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10 Doris Freris, *submission no. 10*, p. 2.

11 ACMA, *transcript of evidence 29 November 2006*, pp. 23-24.

12 PCR FM, *submission no. 32*, p. 3.

13 ACMA, *transcript of evidence 29 November 2006*, p. 24.

14 ACMA, *transcript of evidence 29 November 2006*, p. 24.

- 4.20 ACMA added significant problems and delays would occur if licence allocation was subject to the AAT:

... if you had 18 applicants in Sydney for three licences, what were the odds of it going to the AAT? You can add an extra year or two. That is a decision for the parliament if you want to do that, but it would mean the final decision was made not by [ACMA] but by AAT.<sup>15</sup>

- 4.21 ACMA stated that most licences have been allocated and its focus is now on renewing licences and keeping those licensees accountable:

... three years ago we were allocating 20 or 30 community licences a year ... I think in the last couple of years we have been allocating more like two or three a year. We have finished; not quite, but we have nearly finished. We could spend a lot of time shutting doors on allocation. In a lot of ways, I think that the thinking behind the renewals power was that we have come to the end of when a free new channel was the answer to every government's problem, dispute or inadequacy with the community broadcasting sector in a town. Now we have come to a time where you have got a pretty scarce resource; there are not a lot of alternatives in most places, so let us make sure that the incumbents are accountable. I guess that is where we are putting our resources and energy. But there are still occasionally new licences planned and there are still occasionally allocation processes.<sup>16</sup>

- 4.22 ACMA discussed the options available to it in dealing with regulation breaches:

We can do a whole range of stuff. Depending on how bad the breach is and whether there are statutory requirements ... we use a whole range of stuff from discussions with them, so that they have voluntary undertakings. That is our preferred method of operation because it lets them craft the solution to achieve the outcomes. We have at times put conditions on particular cases ... which [may include] reporting.<sup>17</sup>

- 4.23 ACMA added:

Our experience of our capacity to impose active conditions is that we are quite hamstrung. I would say that we are quite

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15 ACMA, *transcript of evidence 29 November 2006*, p. 24.

16 ACMA, *transcript of evidence 29 November 2006*, p. 24.

17 ACMA, *transcript of evidence 29 November 2006*, p. 26.

conservative in anything we do other than voluntary undertakings. So the risk I think you are going to have, of being aggressively intrusive on our part, is lesser than it might appear on paper. When our powers have been tested in this field, they have generally been shown to be relatively limited.<sup>18</sup>

4.24 ACMA discussed some specific cases and how those cases affected the way in which its decisions are subsequently made:

There was a case three or four years ago with regard to a commercial radio station in Ipswich, Queensland, which we felt was going well beyond its licence area. We tried to impose conditions on them to make them an Ipswich station, which we felt they were. The AAT told us we could not do that. Of course, we then built that understanding of our powers into all our decisions. There was the case with Groove in Western Australia where we have been involved in quite lengthy litigation with them over the conditions we tried to impose. I think we are probably close to an agreement ... with them whereby we will take something that is less intrusive. So we build those into our understanding of what we can do.<sup>19</sup>

4.25 ACMA further discussed how it imposes conditions and the implications for broadcasters and ACMA:

I guess that threat of AAT review has always made the regulator very cautious to ensure that it does what it should have done anyway – that is, take account of the costs or the unreasonableness of any measure it proposes ... there is a very real risk that if we push a station too far over a condition, it will challenge it in the AAT. It will get bogged down there for years, potentially, and we may have our decision overturned. And it is quite resource intensive, not just for them but for us.<sup>20</sup>

4.26 ACMA explained that it could impose a condition on a licence at any time during the licence period.<sup>21</sup>

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18 ACMA, *transcript of evidence 29 November 2006*, p. 27.

19 ACMA, *transcript of evidence 29 November 2006*, p. 27.

20 ACMA, *transcript of evidence 29 November 2006*, p. 28.

21 ACMA, *transcript of evidence 29 November 2006*, p. 26.

4.27 ACMA explained further:

After an investigation and findings, if people do not adhere to those we can revoke that licence at the end of the day, but that is a very long process.<sup>22</sup>

4.28 ACMA added that, in limited circumstances, another path involved prosecution.<sup>23</sup>

4.29 When asked how it acts upon complaints made to it about particular community broadcasters, ACMA stated:

If there is a complaint that there has been a breach of an issue dealt with in a code of practice – an example of that might be racial vilification – then our co-regulatory scheme means that we tell them to go and complain to the station. We will assist them to do that ... if they are dissatisfied with the response then they have a right to complain to us and get the issue resolved and settled. That is how the co-regulatory scheme works on code issues.<sup>24</sup>

4.30 ACMA explained further regarding complaints about breaches of law:

If the breach is about a mandatory standard, a condition or a requirement of law, the complainant has a right to come to us and have a complaint that there has been a breach investigated without recourse to the station.<sup>25</sup>

4.31 When asked what the response would be regarding a complaint concerning sponsorship issues, ACMA stated:

That is a legal issue because that is in their mandatory licence conditions, so the commercial station does not have to go to the community service first, it can come direct to us. The mere fact that they allege that requires us to investigate and report back to them. We would then proceed to do that – of course giving natural justice to the station.<sup>26</sup>

4.32 ACMA explained that the station in question is not informed of who made the complaint:

Quite often complainants ask that their identity be kept quiet, and we would respect that. The reason, at the very broadest, we would

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22 ACMA, *transcript of evidence 29 November 2006*, p. 26.

23 ACMA, *transcript of evidence 29 November 2006*, p. 27.

24 ACMA, *transcript of evidence 29 November 2006*, p. 28.

25 ACMA, *transcript of evidence 29 November 2006*, p. 28.

26 ACMA, *transcript of evidence 29 November 2006*, p. 28.

respect that is that in general when you are a law enforcement body it is in your interest that people bring complaints to you and not be afraid to do that for whatever reason.<sup>27</sup>

- 4.33 ACMA also discussed the nature of some complaints and how community broadcasters deal with them:

... I would say that complaints by commercial broadcasters against community broadcasters are things that only happen to a minority – and probably not a very large minority – of community broadcasters. I would say that we do sometimes see a situation where one individual or group is responsible for a large number of complaints about a particular service. I can see that that puts the service in question under a lot of pressure.<sup>28</sup>

- 4.34 When asked if it was looking at ways of reducing legal costs and litigation in the sector, ACMA explained:

Under the present law we do have an obligation to investigate every time. We have a discretion not to investigate a complaint which is frivolous, vexatious or an abuse of process, but those are very high tests.<sup>29</sup>

### Committee comment

- 4.35 The Committee will not comment on particular decisions made by ACMA as that is not the purpose of this inquiry.
- 4.36 The Committee acknowledges that some community broadcasters have an issue with the way ACMA allocates licences, and the way it handles licence renewals and complaints.
- 4.37 The Committee recognises that meeting particular obligations required by ACMA and the *Broadcasting Services Act 1992* is the responsibility of community broadcasters.
- 4.38 During the inquiry the Committee was impressed with the professionalism of ACMA and its commitment to the sector. However, the Committee is of the opinion that there is scope for ACMA to improve its dealings with licensees.

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27 ACMA, *transcript of evidence 29 November 2006*, p. 28.

28 ACMA, *transcript of evidence 29 November 2006*, p. 31.

29 ACMA, *transcript of evidence 29 November 2006*, p. 31.



- 4.39 The Committee recommends that ACMA substantially improves its transparency with regard to complaint handling and decision making processes.
- 4.40 The Committee also recommends that ACMA improve communications with community broadcasting licensees. This should be achieved by the development and implementation of extension services that allow community broadcasters access to ACMA officers. ACMA should also increase awareness of its processes through workshops and campaigns for the sector.

### **Recommendation 9**

**The Committee recommends that the Australian Communications and Media Authority:**

- **substantially improve its transparency with regard to community broadcasting complaint handling and decision making processes**
- **improve communications with community broadcasting licensees**
- **develop and implement extension services that allow community broadcasters to access Australian Communications and Media Authority officers**
- **increase awareness of its processes through workshops and campaigns directed towards the community broadcasting sector.**

## **Sponsorship**

- 4.41 Many submissions to the inquiry claimed community broadcasting stations are having significant problems concerning sponsorship guidelines.
- 4.42 Some stations are still breaching regulations by one or more of the following:
- **broadcasting material that would be considered advertising**

- broadcasting sponsorship announcements without appropriate tags
- broadcasting more than the five minutes per hour sponsorship announcement limit.

## Sponsorship and advertising

- 4.43 CBAA discussed sponsorship and the regulations that relate to sponsorship:

We as an industry body are charged with the responsibility to come up with codes of practice that are registered with the regulator. It is a common misinterpretation that we get to set the rules for sponsorship. We do not because, as you know, sponsorship is black letter inscribed in the BSA. They have existed in that form since 1992 ... there is certainly no groundswell to have that part of the act revised from our quarter. Getting back to the regulatory framework, there is a frustration and a lack of clarity and transparency in how those provisions ... are interpreted and applied by the regulator.<sup>30</sup>

- 4.44 CBAA explained how the current sponsorship guidelines came about:

In 2003, [ACMA] put out a set of specific guidelines for advertising and sponsorship for community broadcasters – in other words, how to draw the line. This is right off the tail end of the cash-for-comment stuff that swept through the commercial radio industry. Obviously issues about the dividing line between what is valid editorial comment and what is advertorial or advertising were and are live issues in commercial radio, for goodness sake, let alone community radio, where the rigours you would imagine should be applied fairly strongly.<sup>31</sup>

- 4.45 CBAA suggested that the sponsorship guidelines are not helpful and added that community broadcasters have fallen foul of the guidelines:

We believe that the guidelines that were issued in 2003 are not as helpful as they might be ... there has been a recent spate, if that is the word, of regulatory investigations and breaches found against a small handful of community stations that have somehow been found guilty of advertising.<sup>32</sup>

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30 CBAA, *transcript of evidence 31 May 2006*, p. 18.

31 CBAA, *transcript of evidence 31 May 2006*, p. 18.

32 CBAA, *transcript of evidence 31 May 2006*, p. 18.

- 4.46 Melbourne's 3RRR also expressed concern over recent ACMA findings relating to sponsorship in the sector:

There has to be a very pragmatic view of the sector. If it is self-funded then there are only two primary areas for that to come from – sponsorship and listener subscriptions. I think some of the ACMA findings recently are quite bizarre in that regard. For example, a finding that an interview with an artist about an upcoming show in a regional area was contravening sponsorship because it was promoting their show. Well, hello – why else do people go on radio? That would wipe out 80 per cent of Triple R's interviews, because everybody has a CD out or a gig or a show coming up; that is why you are going in to talk to the local media. It is a bizarre finding.<sup>33</sup>

- 4.47 Western Radio Broadcasters discussed the difficulties of determining what sponsorship is:

Another difficulty that we face is the definition of sponsorship announcement. I believe the sector, on the whole, and ACMA need to work vigorously on this ... we do at times have difficulties defining what a sponsorship announcement is. For example, if we interview an up-and-coming Australian artist and then mention where they are appearing or if they have a CD available for sale, under the current guidelines I believe that this is a sponsorship announcement. Until such time as we can receive further clarification surrounding this issue, we have put a halt to all such interviews to protect the licence of Western Radio Broadcasters Inc.<sup>34</sup>

- 4.48 Radio Logan also discussed the difficulties of determining what sponsorship:

One of the main issues experienced by community radio stations is differentiating programming from advertising. Many stations have been taken to task by the ACMA or had 'Show Cause' notices because something said in a program has been interpreted as advertising ... we have a regular Morning Magazine show running for 3 hours Monday to Friday. An important part of this show is interviews with various organisations in the local community. Some of these interviews are with local artists, or local book authors or even a local business that may have important

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33 3RRR, *transcript of evidence 24 May 2006*, pp. 11-12.

34 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 55.

information for the community. As soon as the whereabouts of the business is mentioned, or the availability of a CD or book, this then becomes an advertisement. There does not seem to be any leeway. We feel there should be more latitude when it comes to differentiating programming to advertising.<sup>35</sup>

- 4.49 ACB also raised the issue of promotion of local music and events, including interviews, book reviews and CD giveaways:

The decision against 2SWR-FM by ACMA regarding the interview being advertising sent shockwaves throughout our members. Almost every week the ACB is now being asked by its members about what they are allowed to broadcast. As Christian stations we want to do book reviews, we want to do interviews and promote and encourage Christian music, especially Australian Christian music. We want to give away film tickets to family friendly movies or concerts, we want to help charities and we firmly believe that our community of interest wants their station to be doing this as well.<sup>36</sup>

- 4.50 ACB suggested that its members are subject to onerous compliance burdens:

The very sector in Australian broadcasting – community radio – with the least amount of resources, with an expectation to use volunteers and to serve a community of interest, has compliance burdens put on it that commercial broadcasters, who seem to have plenty of resources, do not even think twice about.<sup>37</sup>

- 4.51 ACB added:

We are also finding that in the sector there is very little help available. For instance, if we were to ring ACMA and ask for an opinion, we would not be able to get one. Sometimes that is distressing because the only way we find out that we are in breach is when a complaint is lodged.<sup>38</sup>

- 4.52 Mr Shane Moore, a community broadcaster with a number of stations, explained difficulties in promoting local music:

Specifically, the scenario is the one in which a program presenter wishes to present a 'gig-guide', i.e. an enumeration of bands, or

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35 Radio Logan, *submission no. 47*, p. 2.

36 ACB, *transcript of evidence 6 September 2006*, p. 4.

37 ACB, *transcript of evidence 6 September 2006*, p. 5.

38 ACB, *transcript of evidence 6 September 2006*, p. 5.

DJs, or concerts, or other public performances which may be of interest to listeners ... the rulings by the Authorities seem to suggest that such enumerations could be construed to be advertisements, because the performers generally make some profit from performing ... but they have not 'sponsored' the station.<sup>39</sup>

4.53 Mr Moore added:

It would be very difficult in general to contact each individual performing group/ solo-artist to ask them to make a 'sponsorship' payment to the station, and would sound silly to then say about each act 'sponsors of the station', yet this is what the recent breach rulings seems to suggest is meant to occur.<sup>40</sup>

4.54 Mr Moore sought clarification on whether gig guides were construed as advertising, and if so, asked:

... that the community broadcasting license conditions in the Act be re-worded to allow for some form of non-sponsored gig guides to be aired.<sup>41</sup>

## Tagging announcements

4.55 Several submissions to the inquiry called for a change in how sponsorships are tagged, or for dropping the tag requirement altogether.

4.56 Upper Goulburn FM stated:

We need more flexibility in the way we are allowed to promote activities and items of interest for which we receive no return, remuneration, or kickbacks. The line between advertising and information needs to be black and white. If we are receiving nothing in return for it, then it's not a Sponsor and not classified as advertising.<sup>42</sup>

4.57 Upper Goulburn FM explained that:

The word 'Sponsor' should remain if only to indicate the current announcement is a paid announcement of which the station is receiving a return, remuneration or kickback. Everything else not

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39 Shane Moore, *submission no. 50*, p. 4.

40 Shane Moore, *submission no. 50*, p. 4.

41 Shane Moore, *submission no. 50*, p. 4.

42 Upper Goulburn FM, *submission no. 44.1*, p. 3.

'tagged' 'Sponsor' then the station is not receiving a return, remuneration or kickback.<sup>43</sup>

4.58 Upper Goulburn FM added:

The word 'Sponsor' should also be able to be used for a group of sponsor's announcements when they are aired as a group, instead of having to 'tag' each announcement in the group. They should be able to be 'tagged' at the start or the end of the group.<sup>44</sup>

4.59 Family Radio discussed its view of tagging announcements:

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.<sup>45</sup>

4.60 Radio KLFM remarked on the difference between sponsorship and advertising:

It is usually obvious when a paid announcement is being run ... we submit that community radio listeners are just as well able to discern an advertisement as are commercial radio listeners. Therefore the need for tagging, and the difference between sponsorship and advertising, seems to be an unnecessary legal technicality that provides the principal source of complaints against community radio licensees for breaching the BSA.<sup>46</sup>

4.61 Radio KLFM queried the technical legal difference between sponsorship and advertising:

Our experience is that for all intents and purposes the general listener (and sponsor/advertiser) does not see any difference between an advertisement broadcast on commercial radio and the

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43 Upper Goulburn FM, *submission no. 44.1*, p. 3.

44 Upper Goulburn FM, *submission no. 44.1*, p. 3.

45 Family Radio, *submission no. 36*, p. 8.

46 Radio KLFM, *submission no. 82*, p. 11.

same announcement broadcast on community radio with the words station sponsor (or similar) added.<sup>47</sup>

4.62 Radio KLFM added:

It seems that a lot of ACMA time and resources are used to enforce a very technical legal difference between an advertisement and a sponsorship announcement. Could these scarce resources be better employed elsewhere?<sup>48</sup>

4.63 ACB suggested that its members are trying to serve their community of interest, and advocates that:

... [community service announcements], either paid or unpaid, from registered charities, religious organisations or not-for-profit incorporated associations should be allowed and, indeed, encouraged on community stations and should not be considered sponsorship, which was clearly intended in the first place to allow community stations to raise operational revenue from commercial sources.<sup>49</sup>

## Possible solutions

4.64 Mr Peter James, a lawyer that has acted for several community broadcasters, outlined some proposed changes that would make compliance less onerous for broadcasters and ACMA.

4.65 In summary, Mr James' submission called for three changes:

- Permitting advertising - no more tagging. The removal of the prohibition against community broadcasting licensees broadcasting advertisements, while retaining the existing limitation of five minutes per hour (radio) or seven minutes per hour (television). That hourly limitation would need to be modified to apply to advertising, rather than sponsorship announcements and this submission suggests it be moved to the Code of Practice).
- ACMA power to make determinations and grant exemptions. The introduction of a power for ACMA to issue binding determinations about sponsorship (if that is retained) and advertising (regardless of whether the first submission is accepted) and about the five or seven minutes per hour limit and codes of practice. The ACMA should also be

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47 Radio KLFM, *submission no. 82*, p. 11.

48 Radio KLFM, *submission no. 82*, p. 12.

49 ACB, *transcript of evidence 6 September 2006*, p. 4.

given the power to exempt in appropriate circumstances, where the interests of the station's community of interest would not be damaged by doing so. Both determinations and exemptions might be specific to a licensee or to a class or all licensees.

- Move the five or seven minute limit to the Codes of Practice. The existing limitation of five minutes per hour (radio) or seven minutes per hour (television) should be removed as a schedule 2 licence condition and instead should form part of the Community Broadcasting Code of Practice (where most other important content restrictions currently are placed, such as restrictions on vilification), which is consistent with the approach used for commercial broadcasting.<sup>50</sup>

4.66 Mr James stated that these measures would:

- remove significant compliance risk from a meaningless restriction (sponsor tagging)
- enable the ACMA to assist community broadcasters to comply (through the determinations and exemption power), rather than limiting its role to investigating and punishing non-compliance
- ensure the limitation on the volume of advertising is placed with other content regulation (in the Code of Practice), so that licensees have one source for their content regulatory compliance and so advertising restrictions are not irrationally elevated in importance above other important content regulation (such as vilification).<sup>51</sup>

4.67 Radio KLFM stated that:

The current restrictions on community broadcasters broadcasting sponsorship/advertisements are complex and have acted to restrict the ability of community broadcasters to interact with and promote their community, including local business and to be more self funded.<sup>52</sup>

4.68 Radio KLFM also outlined some recommendations for improving the sponsorship regulation situation:

- that the current prohibition on community broadcasters broadcasting advertisements be repealed
- that the current distinction between advertisement and sponsorship be removed to help simplify and clarify the regulations and to help remove the major source of complaints against community radio licensees

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50 Peter James, *submission no. 52*, pp. 1-2.

51 Peter James, *submission no. 52*, p. 2.

52 Radio KLFM, *submission no. 82*, p. 14.



- that the current limits on community broadcasters broadcasting sponsorship announcements/advertising be removed and the level of sponsorship/advertising broadcast by each station be determined by that station and its community of interest
- that if recommendation three is implemented there be a graded set of licence fees for community broadcasters.<sup>53</sup>

## The need for clarity

4.69 Many submissions called for the clarification of sponsorship guidelines for the community broadcasting sector.

4.70 CBAA stated:

The point is that we do want some transparency and clarity. If, as a result of our analysis of these recent decisions, we go back to the regulator and they say, 'No, sorry, this is the valid determination,' I do not know that we will have the legal resources to test it in court, which is where you would have to take it. So you might be hearing from us if we feel that they do have a narrow, onerous or unclear interpretation of the dividing line between advertising and sponsorship. I hope that is clear.<sup>54</sup>

4.71 Western Radio Broadcasters discussed the sector and the need for assistance:

I will go back to the fact that community broadcasting is about volunteerism and I believe that government and government departments need to keep that very much in mind. If I were to go to ACMA now and ask, 'What are the sponsorship guidelines?' I think I might get told in reply, 'The act is there; I think you should read it.' That is fine. We can read the act and I suppose we could get 50 different QCs to give us an opinion on it and they would all be different. We are treading through a mine field ... we need to try to work through this area because it is tough and it is a restriction that is being placed on us. It is not about blatant advertising.<sup>55</sup>

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53 Radio KLFM, *submission no. 82*, p. 14.

54 CBAA, *transcript of evidence 31 May 2006*, p. 19.

55 Western Radio Broadcasters, *transcript of evidence 20 July 2006*, p. 66.

4.72 ACB also called for clarity concerning sponsorship:

There is ambiguity. We find that the word 'sponsorship' is not even defined. ACB, on behalf of all of our members, would like to see that resolved so that there is no further ambiguity.<sup>56</sup>

4.73 ACB added:

... the act is very ambiguous in terms of what is promotional content, what is community content and what is community promotional content. In the act there is no definition of advertising. There is no definition of a community of interest. ACMA cannot give you advice about what it is because they do not really know either. If there is a complaint it usually takes eight weeks to resolve. It could cost you \$10,000 to \$20,000 to defend your position for something that in effect is actually a trivial issue.<sup>57</sup>

4.74 ACB discussed how onerous compliance can be for its members:

Two days ago I received a sponsorship policy document that one of our members had put out. It runs for 12 pages of single-spaced text. It is to, step by step, give announcers a heads-up. It says: 'If you do an interview, make sure you don't do this and don't do that. If you're doing a book review, be careful not to mention this.' Remember that a lot of our announcers are not paid; they are volunteers. If we had a professional commercial announcer come in and give them 12 pages of information and say, 'Go and do an hour's shift and make sure you don't make any mistakes because you could make us lose our licence,' it would not make for good broadcasting. You cannot do good programming when you are under that sort of pressure.<sup>58</sup>

4.75 Family Radio claimed that ACMA guidelines regarding sponsorship announcements were inconsistent and recommended a review of the guidelines.<sup>59</sup>

4.76 Family Radio added:

It would greatly assist community radio if the ACMA were empowered to issue binding rulings and exemptions about

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56 ACB, *transcript of evidence 6 September 2006*, p. 5.

57 ACB, *transcript of evidence 6 September 2006*, p. 5.

58 ACB, *transcript of evidence 6 September 2006*, pp. 5-6.

59 Family Radio, *submission no. 36*, p. 8.

specific sponsorship or advertising issues. That would give more regulatory certainty.<sup>60</sup>

## ACMA

4.77 ACMA explained the difficulty of sponsorship and advertising for the community broadcasting sector:

A key issue for any community sector in any country is how it funds itself. If you look at countries around the world, you will see that they are on a continuum between: 'No advertising allowed; go and find some other way of doing it,' and 'You can advertise and, if you get the governance right, that's all that's important. You have to be not-for-profit and all those sorts of things.' We are somewhere in the middle.<sup>61</sup>

4.78 ACMA explained further:

What we actually have is a prohibition on advertising as a condition and a series of dispensations to put in what is, in effect, advertising or promotional material, which is very wide. If you have any legal training, that should be immediately signalling complex issues, because it means that as soon as a community service wanders out of these wide dispensations it finds itself breaching the fundamental condition that it is not allowed to advertise.<sup>62</sup>

4.79 ACMA discussed the nature of sponsorship for the sector:

The main dispensation it has – you have probably heard all this from the community sector too – is on sponsorship announcements, which can be promotional. There is not much difference between them and ads, but the act does not use the term 'ad', so we always insist that they have to have a tag. We do not mind if they otherwise sound like ads.<sup>63</sup>

4.80 ACMA discussed what it communicates to the sector and feedback it has received:

We are saying, 'What is a simple one that they can understand?' We say, 'It has to have to a tag which acknowledges a sponsor.' That is relatively simple because, in the end, it comes down to

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60 Family Radio, *submission no. 36*, p. 8.

61 ACMA, *transcript of evidence 29 November 2006*, p. 12.

62 ACMA, *transcript of evidence 29 November 2006*, p. 12.

63 ACMA, *transcript of evidence 29 November 2006*, p. 12.

tracking it with a stopwatch. Where I think they have run into difficulties in the last year or two has been around community promotional material, and certainly we have received a fair bit of feedback about that recently.<sup>64</sup>

- 4.81 ACMA admitted that the regulations are complex and stated that it publishes guidelines for the sector:

I do think that it is very hard to get the very small organisations that often run community stations to understand and administer really complex law that lawyers can struggle with. So we have always promulgated and, in the past, periodically updated a guideline on the promotion and sponsorship of a community station.<sup>65</sup>

- 4.82 ACMA discussed problems raised regarding sponsorship guidelines, particularly in recent times:

What we have learned over the last six months ... is that the sponsorship guidelines are out of date and that there is a lot of confusion, particularly around the issue of community promotion: where it adjoins sponsorship and where it becomes illegal advertising.<sup>66</sup>

- 4.83 ACMA stated that it has:

... undertaken to the sector to work with the CBAA ... to update the guideline to take account of recent decisions of our investigation team which have caused real concern.<sup>67</sup>

- 4.84 ACMA also admitted that it has:

... recognised and affirmed to the sector that we have allowed the guideline to get out of date and that we want to work with them to update that.<sup>68</sup>

## Sponsorship limits

- 4.85 There has been some debate regarding the level of sponsorship community broadcasters should be allowed.

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64 ACMA, *transcript of evidence 29 November 2006*, p. 12.

65 ACMA, *transcript of evidence 29 November 2006*, p. 12.

66 ACMA, *transcript of evidence 29 November 2006*, p. 12.

67 ACMA, *transcript of evidence 29 November 2006*, p. 12.

68 ACMA, *transcript of evidence 29 November 2006*, p. 12.

- 4.86 Currently, community broadcasters are prohibited from carrying advertising, but may broadcast up to five minutes (radio) or seven minutes (television) of sponsorship announcements per hour (Schedule 2, Part 5, 9(3)(a) and 9(3)(b) of the BSA).<sup>69</sup>
- 4.87 Submissions to the inquiry revealed that some broadcasters felt that the five minutes per hour limit for community radio is sufficient, while other stations feel an increase would help them significantly.
- 4.88 Griffith University's Centre for Public Culture and Ideas suggested that:
- The sector is under increasing pressure from policy-making bodies to increase sponsorship and income levels, which is affecting the content and operations of many stations.<sup>70</sup>

### Increase the limit

- 4.89 Some stations suggested increasing the sponsorship limit.
- 4.90 ArtSound FM recommended:
- ... increasing the current limit of 5 minutes of sponsorship messages in any hour to 6, thereby providing a modest but vital increase to community radio's revenue generating capabilities.<sup>71</sup>
- 4.91 Sydney's Radio2000 recommended that sponsorship time should increase from five minutes per hour to seven minutes per hour to be in par with CTV.<sup>72</sup>
- 4.92 GVCR recommended that consideration should be given where a need can be demonstrated for an increase in sponsorship limitations.<sup>73</sup>
- 4.93 Community Radio Coraki asked:
- ... what if the Federal Government were to increase the sponsorship announcement per hour from five minutes to six minutes. That would provide stations with a potential 20% revenue increase.<sup>74</sup>

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69 ACMA, *submission no. 115*, p. 5.

70 CPCI, *submission no. 89*, p. 5.

71 Artsound FM, *submission no. 28*, p. 4.

72 Radio2000, *submission no. 64*, p. 5.

73 GVCR, *submission no. 97*, p. 1.

74 Community Radio Coraki, *submission no. 22*, p. 8.

### Keep the limit at five minutes per hour

- 4.94 Some stations suggested that the five minutes per hour level of sponsorship for community radio is adequate.
- 4.95 Bay and Basin FM stated that its management and membership:  
... does not have an issue with a 5-minute limit to sponsorship or tagging of these announcements as sponsorship. This fortunately is one of the good differentiating factors of Community Radio over Commercial Radio. Current regulations in this area still allow Community Radio to gather sufficient sponsorship.<sup>75</sup>
- 4.96 PMBA believes that stations should rely less on sponsorship:  
One of the greatest threats to, and perhaps one of the greatest failures of, the community radio sector is that of widespread dependence on sponsorship. While our station stands out as being fiercely independent of the demands of sponsors, we believe there is a trend in community radio to pander to the desires of sponsors. It would greatly improve the independence of the community radio sector if stations could be encouraged to diversify their income sources away from a heavy reliance on sponsorship.<sup>76</sup>
- 4.97 PMBA added:  
Our sponsorship policy ensures that we have minimal sponsorship messages (usually less than 1 minute per hour) and that they are almost exclusively music/arts related promotions. Our membership and our community of interest expect us to maintain our independence from commercial pressures.<sup>77</sup>
- 4.98 Mr Darce Cassidy, a private individual, stated that:  
Advertising is now the single largest source of funds for community broadcasters, and on average accounts for 32% of income. However at 2TEN in Tenterfield, it accounts for 80% of income. It is not surprising therefore Dr Kitty van Vureen, in her study of community stations in regional areas, concludes that 2TEN takes commercial broadcasting as its source of reference.<sup>78</sup>

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75 Bay & Basin FM, *submission no. 38*, p. 1.

76 PMBA, *submission no. 121*, p. 4.

77 PMBA, *submission no. 121*, p. 2.

78 Mr Darce Cassidy, *submission no. 58*, p. 5.

4.99 Mr Cassidy discussed broadcasters' dependence on sponsorship or advertising:

Such is the lure of advertising that community broadcasters are calling out for more, and are regularly and persistently breaking the guidelines relating to the limitation of advertising on community radio. Advertising is limited to five minutes per hour, but this requirement is regularly flouted. In fact breaches of the restrictions on advertising on community radio is the complaint most frequently upheld by the Australian Broadcasting Tribunal in relation to radio. Findings against community radio stations for breaches of the sponsorship/advertising rules account for just over a quarter of all breaches by all radio stations in Australia.<sup>79</sup>

4.100 When asked if five minutes per hour of sponsorship announcements is sufficient for the sector, Melbourne's 3RRR stated:

I think five minutes is okay. We have a policy at Triple R of four – we stayed with the old one – but I think five minutes is fine. No-one is running anywhere near that other than in a few popular programs. If we could run five minutes an hour for 10 hours a day we would be in a totally different circumstance. I cannot see any need for that to be increased. I know there is an argument in community television that it should be higher and I cannot see any need for that either. I think five minutes for non-commercial not-for-profit services is absolutely adequate and gives us a good level of self-funding.<sup>80</sup>

4.101 NEMBC also considered the five minute limit to be adequate, particularly in light of the benefits to the community a station serves:

The moment you start forcing stations to sell their time in order to make ends meet, that works at the expense of community input. We have agreed as a sector that four or five minutes per hour ought to be the very maximum. We have noticed that people under pressure are forced to sell time and, by doing so, deny the community greater access.<sup>81</sup>

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79 Mr Darce Cassidy, *submission no. 58*, p. 5.

80 3RRR, *transcript of evidence 24 May 2006*, p. 12.

81 NEMBC, *transcript of evidence 20 July 2006*, p. 34.

## Committee comment

- 4.102 The Committee considers that the current limits of five minutes per hour of sponsorship announcements for community radio, and seven minutes per hour for community television, are sufficient for the sector.
- 4.103 The Committee is also of the opinion that the sponsorship tagging requirement should remain as part of the sponsorship regulations for the sector.
- 4.104 The Committee recognises that a significant amount of information on sponsorship guidelines for the sector exists for broadcasters to utilise. For example, the CBAA Handbook describes in great detail what stations can and cannot do.
- 4.105 The Committee also recognises that ACMA has provided extensive advice on sponsorship guidelines.
- 4.106 The Committee urges all community broadcasters to take advantage of the detailed material provided by the CBAA and ACMA.
- 4.107 ACMA's participation in events like the CBAA annual conference is a significant measure of its willingness to provide extension service to the sector.
- 4.108 However, the Committee feels that ACMA could be more active in the provision of advice to community broadcasters.
- 4.109 By ACMA's own admission, the sponsorship guidelines need to be updated. The Committee acknowledges that ACMA has pledged to work with the sector to update the sponsorship guidelines, and trusts that this will occur in the next 12 months.
- 4.110 The Committee trusts that a revised set of sponsorship guidelines and increased awareness in the sector will lead to a significant decrease in regulation breaches.
- 4.111 The Committee believes that broadcasters should be able to contact ACMA for an opinion on an issue, or have the ACMA contact a particular broadcaster regarding a complaint, rather than a station merely receiving a breach notice.
- 4.112 The Committee recommends that the Australian Government, in particular, ACMA, clarify community broadcasting sponsorship guidelines and provide detailed explanatory material concerning broadcaster responsibilities.



- 4.113 The Committee also recommends that ACMA provide significant extension support to stations regarding sponsorship guidelines, and significantly increase its awareness raising workshops and campaigns in community radio forums.

#### **Recommendation 10**

**The Committee recommends that the Australian Government, through the Australian Communications and Media Authority, clarify community broadcasting sponsorship guidelines and provide detailed explanatory material concerning broadcasters' responsibilities.**

**The Committee further recommends that the update of sponsorship guidelines should be completed by 30 June 2008.**

#### **Recommendation 11**

**The Committee recommends that the Australian Communications and Media Authority:**

- **provide significant extension support to community broadcasting stations regarding sponsorship guidelines**
- **significantly increase its awareness raising workshops and campaigns in community broadcasting forums.**



## Other community broadcasting sector issues

- 5.1 This chapter examines other issues affecting the community broadcasting sector, including:
- the move to digital
  - transmission fees
  - other technologies
  - radio for the print handicapped.

### The move to digital broadcasting

- 5.2 The Minister for Communications, Information technology and the Arts announced the framework for the introduction of digital radio in October 2005.<sup>1</sup>
- 5.3 CBAA stated that, at that time:
- ... the Government made a series of commitments that make community broadcasting an essential part of the framework for digital radio in Australia, on a basis affordable for the sector.<sup>2</sup>
- 5.4 CBF stated that the announcement of the Australian Government's Digital Radio Framework in October 2005 changed several key industry

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1 <[www.minister.dcita.gov.au/media/media\\_releases/framework\\_for\\_the\\_introduction\\_of\\_digital\\_radio](http://www.minister.dcita.gov.au/media/media_releases/framework_for_the_introduction_of_digital_radio)>, accessed 3 May 2007.

2 CBAA, *submission no. 61*, p. 30.

assumptions about the process and has shifted the time-frame for implementation from the horizon to the foreground.<sup>3</sup>

5.5 CBF outlined the state of play surrounding the move to digital:

- Digital radio is viewed as a supplementary platform to analogue rather than as a replacement.
- A limited amount of digital spectrum is guaranteed for wide-area community radio services to be introduced in metropolitan areas. This is a lesser amount than that available to commercial and national services and will not be sufficient to translate all existing wide-area analogue services. Jointly, wide-coverage community broadcasters in any metropolitan market will have access to 128kbps 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.
- Wide area community broadcasters may jointly participate in the management of multiplex ensembles and hold the associated spectrum licenses in each market.
- New services adding to the diversity of services currently available and new innovative functions associated with those services (record & rewind, streamed text, play list information and still images) are expected to drive listener take-up. Accordingly simulcasting of existing services is not required.
- Planning for localised (suburban) and non-metropolitan services will be considered at a later stage.<sup>4</sup>

5.6 CBAA also discussed the digital conversion process:

The framework outlines a staged rollout, with digital radio to be implemented in metropolitan areas as soon as practicable. The Government has also urged broadcasters to trial digital radio in regional areas so that technical and other issues can be resolved. The Government will then consider what financial support is necessary to expand digital radio into rural and regional Australia.<sup>5</sup>

5.7 CBAA added:

The Government's framework is built around digital radio being a supplement to existing radio services in Australia rather than a replacement technology, as it is with television. In the long term, should digital radio supplant the place of analogue radio in common use then the community sector would expect the

3 CBF, *submission no. 114*, p. 28.

4 CBF, *submission no. 114*, p. 28.

5 CBAA, *submission no. 61*, p. 31.

Government to hold true to the full extent of its commitments and ensure sufficient digital capacity is provided to carry the full range of existing community broadcasters.<sup>6</sup>

5.8 Submissions to the inquiry have generally indicated that most community broadcasting stations are not yet considering the move to digital broadcasting.

5.9 Indeed, some stations cannot yet afford digital production facilities for their stations. For many stations, the move to digital is many years away and well beyond current station budgets.

5.10 Melbourne's 3CR stated that the possibilities of digital radio are yet to be fully explored as it struggles to implement other much needed technologies.<sup>7</sup>

5.11 Melbourne's 3CR explained that it cannot begin to think about the move to digital broadcasting, as it can barely afford digital production technology:

... we have struggled to equip our station with up-to-date technology due largely to financial constraints ... our on air system continues to be reliant on [cartridges] which are extremely old and problematic and funding has restricted us in replacing the system ... the transition from reel to reels to digital recording and editing has been slow and costly and continues to be implemented ... [other] opportunities have not yet been taken up due to hardware and technical limitations unable to be overcome due to financial restraints.<sup>8</sup>

5.12 Eastside Radio in inner Sydney is in a similar situation:

It would be our dream to broadcast in digital. At the moment we do not even have computers in our studios and we do not even have digital editing. We are constantly asked when will we be able to have online streaming and pod casting. The sad realisation is that new technology require new equipment and training which of course costs money. We do not have the funds to explore such venture at the moment ...<sup>9</sup>

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6 CBAA, *submission no. 61*, p. 32.

7 3CR, *submission no. 26*, p. 4.

8 3CR, *submission no. 26*, p. 4.

9 Eastside Radio, *submission no. 9*, p. 3.

- 5.13 Western Victorian station 3WAY FM summarised its position with regard to digital conversion:

We are relieved that the coming digital revolution is not seen as a replacement technology, as our location and resource base will probably mean we are a considerably long way from being able to make the change. We are fairly firmly rooted in the analogue mode into the immediate future.<sup>10</sup>

- 5.14 CBAA suggested that the sector would need financial support for the move to digital:

There is a reasonable expectation that the Government would underscore its guarantee of digital capacity by assisting with the cost of linking and transmission aspects necessary to effect use of digital capacity.<sup>11</sup>

- 5.15 Melbourne's 3ZZZ stated that its ability to broadcast in digital will be limited without:

... the proviso that the Federal Government provide funding for the community broadcasting sector as the cost of migration to the new technology is far beyond our ability to afford it.

- 5.16 AFMN stated that each station supports the move to digital, however:

... each needs to find or generate the considerable funds necessary to make the change. It is expected that for many years after the introduction of digital broadcasting, it will be necessary to continue broadcasting in FM analogue to service those listeners who have not bought or cannot afford to buy digital receivers. This poses challenges for community radio because the costs involved in the transition to digital radio transmissions are likely to be considerable.<sup>12</sup>

- 5.17 Upper Goulburn FM stated that the cost of conversion would be too great:

... the migration for us to digital without significant injection of funds for both infrastructure and ongoing transmission costs ... would be horrific.<sup>13</sup>

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10 3WAY FM, *submission no. 30*, p. 3.

11 CBAA, *submission no. 61*, p. 31.

12 AFMN, *submission no. 40*, p. 5.

13 UGFM, *submission no. 44*, p. 4.

5.18 Melbourne's 3RRR discussed the need for financial support:

The sector is very accustomed to generating funding ... digital infrastructure for transmission has to be 100 per cent funded or the community broadcasting sector will slowly disappear. That does not have to be funding delivered in a short period; it could be delivered over a 20-year period with metro to regional to rural and remote.<sup>14</sup>

5.19 CBF suggested that the move to digital will require a change in outlook for some community broadcasters:

The parameters of the Digital Radio Framework set a considerable challenge to the metro-based community radio sector to reorganise from a large group of avowedly independent organisations providing separate services to a collective producing a range of new, innovative services.<sup>15</sup>

5.20 CBF added that the greater challenge will be for the sector to:

... establish the infrastructure for those new services and find the ongoing resources for program production. Clearly the current major sources of income for community radio services in metropolitan areas – sponsorship, subscriptions, and donations could only be developed in line with listener take-up of the new digital medium.<sup>16</sup>

5.21 Noosa Community Radio raised concerns about licensing arrangements under the new digital broadcasting regime:

... in this region, only 4 digital licenses will be issued, and us being a community radio station, have no chance of securing at least one of those licenses against the bigger commercial stations. There would appear to be an inequality in the distribution of same, rendering community radio as not even in the running, to obtain one of these licenses.<sup>17</sup>

5.22 Family Radio is also concerned that the community radio sector will be disadvantaged with respect to commercial radio services:

The concern is based on much speculation that a different set of rules may be implemented for community operators and may lead

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14 3RRR, *transcript of evidence 24 May 2006*, p. 8.

15 CBF, *submission no. 114*, p. 29.

16 CBF, *submission no. 114*, p. 29.

17 Noosa Community Radio, *submission no. 73*, p. 4.

to the [nobbling] of our ability to deliver digital services with the same technical integrity as the commercials.<sup>18</sup>

5.23 CBF summarised the move to digital issue:

Until the many operational issues surrounding community broadcasting access to digital spectrum are resolved, the prospect of digital transition must be regarded as both one of the sector's greatest opportunities and threats. From the Foundation's perspective early clarification of the Australian Government's funding support for digital infrastructure, associated program production, aggregation, distribution and other operational costs would be of great assistance in ensuring that the sector engages effectively with the challenge presented by new and converging technologies.<sup>19</sup>

5.24 FSG sought \$2 458 000 in 2007-08 for funding support for the first year of the first phase of digital radio implementation.<sup>20</sup>

5.25 FSG indicated that this amount was for estimated capital and operational transmission costs for the first year implementation, as supplied to DCITA by the CBAA in October 2006.<sup>21</sup>

5.26 FSG also indicated that additional capital and operational costs for the second year of implementation (main VHF site in each city plus full hub costs) would total \$5.633 million.<sup>22</sup>

## Committee comment

5.27 The Committee noted that many submissions did not provide extensive comments on the conversion to digital broadcasting. The Committee was surprised that several key submissions did not elaborate on the issue. This indicated that broadcasters are not considering the move to digital as an urgent issue for the immediate future.

5.28 The Committee understands the barriers faced by many smaller community broadcasters in terms of being able to afford the move to digital broadcasting.

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18 Family Radio, *submission no. 36*, p. 6.

19 CBF, *submission no. 114*, pp. 29-30.

20 FSG, *exhibit no. 11*, p. 14.

21 FSG, *exhibit no. 11*, p. 14.

22 FSG, *exhibit no. 11*, p. 14.



- 5.29 The Committee appreciates how difficult it can be for stations to raise revenue for current services. The Committee recognises that obtaining additional funds for digital conversion will be particularly difficult.
- 5.30 The Committee is pleased to note that the Australian Government has made a significant commitment in the 2007-08 Budget for digital radio rollout. A commitment of \$10.5 million has been made to help community and national broadcasters establish digital radio infrastructure.
- 5.31 However, the Committee must make comment of its surprise at the 2007-08 Australian Government commitment to digital radio conversion at this time. While supportive of the funding, the Committee notes that many community radio stations are facing more immediate issues, with infrastructure and equipment replacement needed as a priority before thought is given to digital conversion. If the funding for digital conversion is to be effective, the Committee reiterates the importance of increasing core and targeted funding beginning in 2007-08, as recommended earlier.

## Transmission fees

- 5.32 A key threat for the community broadcasting sector is further pressure on viability through marked increases in transmission site access fees charged by commercial providers.<sup>23</sup>
- 5.33 CBAA stated that only 69 per cent of community broadcasters enjoy reception coverage on par with other broadcasters in their areas.<sup>24</sup>
- 5.34 CBAA also stated that with 60 per cent of stations leasing their transmission site and/or facilities from a third party, the increasing cost of transmission is a major concern.<sup>25</sup>
- 5.35 CBAA provided some background on transmission for the sector:
- Since the Government's sale of the National Transmission Network for \$650m in 1999 to *NTL Australia Pty. Ltd.* ... which has since become Broadcast Australia ... the community broadcasting sector has progressively been exposed to full commercial pricing of access to privately owned transmission infrastructure. While commercial media can pass these costs on to advertisers and public broadcasters' transmission costs are supported from the

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23 CBAA, *submission no. 61*, p. 42.

24 CBAA, *submission no. 61*, p. 42.

25 CBAA, *submission no. 61*, p. 42.

public purse the community sector is faced with a substantial increase in transmission infrastructure costs as a percentage of total operating costs with little opportunity to defray them through increased turnover.<sup>26</sup>

5.36 CBAA added:

The consolidation of transmission infrastructure as a result of the introduction of digital broadcasting only threatens to further exacerbate this process.<sup>27</sup>

5.37 CBAA acknowledged the Australian Government's assistance with the problem:

The Government recognised this problem and has addressed it to some extent by the introduction of a Transmission Access Fund, which subsidises the costs of transmission for community broadcasting stations. However, the high costs of transmission remain an ongoing concern for community broadcasters.<sup>28</sup>

5.38 CBAA discussed the control of transmission sites and the increase in fees:

We have a good relationship with [Broadcast Australia], but boy, do they know how to charge fees. I use the words advisedly; I would not accuse them of being monopoly operators, but what is the next step back from a monopoly? I am not an economist, but they do have the vast majority of viable sites and they paid a reasonably stiff figure for them – over \$600 million back in 1997. But they are extracting very good economic rents for the use of those sites ... we have tracked the site access fees paid between 2002-03 and 2003-04 and, sadly, transmission site access fees went up by 54 per cent in that one year.<sup>29</sup>

5.39 CBAA explained that many of the site access agreements came up for renegotiation in 2003-04:

The net result was a 54 per cent hike in fees. Our claim, and it would stand up to some investigation and empirical testing, is that the fees charged by the commercial providers of sites are arguably outpacing the underlying costs.<sup>30</sup>

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26 CBAA, *submission no. 61*, p. 42; CBAA, *transcript of evidence 31 May 2006*, p. 5.

27 CBAA, *submission no. 61*, p. 42.

28 CBAA, *submission no. 61*, p. 42.

29 CBAA, *transcript of evidence 31 May 2006*, p. 6.

30 CBAA, *transcript of evidence 31 May 2006*, p. 6.

- 5.40 When asked if the increase in fees was significantly disadvantaging the sector, 3RRR stated:

Yes, it is pushing a lot of the sector ... after the NTA was sold and privatised, a lot of the little stations in regional areas had much higher transmission costs for analog ... for new stations like FBI in Sydney and SYN, they are on turnkey and a lot of the transmission is \$75,000 to \$95,000 a year just in site fees. That is not power, operating costs or transmitter maintenance; it is just a site fee to be there. Those are costs that stations like Triple R and others in the early days never had. Those stations have had those sorts of costs from day one ... at the moment analog transmission for new stations ... are around \$80,000 a year, and that is fairly heavily discounted from their standard commercial rates.<sup>31</sup>

- 5.41 Melbourne's 3RRR discussed the history of transmission arrangements:

In a number of capital cities, those early stations were on commercial sites at a relatively minimal cost basis. My old station, RTR in Perth, for instance, had that same arrangement whereby it had no transmission site fees other than its power. Things have changed around the country, and, when that was re-examined two or three years ago, its site fees were changed and are now close to \$100,000 a year. Triple R is still under its original agreement. It is up on the Channel 7 tower at Mount Dandenong ... but we still do not get charged a site fee. At some point something called Melbourne FM facilities, which is an amalgamation of commercial services, will say: 'Why has this little thing been happening on the tower for the last 30 years?' And, at the point someone says that we will have to pay a lot more in transmission site fees. It is one of those idiosyncratic things where we are just quietly ticking along for as long as we possibly can.<sup>32</sup>

- 5.42 A number of submissions shared concerns about significant increases in transmission fees, and how those costs would be met in the future.

- 5.43 PMBA stated:

The sale of the Government owned National Transmission sites has caused a rapid rise in costs to community broadcasters who have their transmitters located on these sites. Our own fees have nearly tripled since the sale. It has been good to see the recent increases in subsidies available to community broadcasters who

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31 3RRR, *transcript of evidence 24 May 2006*, p. 17.

32 3RRR, *transcript of evidence 24 May 2006*, p. 17.

must pay these increased fees and it is vital to our continued operation that these subsidies keep pace with expected future increases.<sup>33</sup>

5.44 Coral Coast Community Radio stated:

... transmission costs (rent for our tower space) being increased to market rates ... would impose severe financial pressure on our organization.<sup>34</sup>

5.45 ArtSound FM suggested that:

Care must be taken to ensure that community radio stations have access to broadcasting sites at reasonable rates which reflect their not-for-profit status. We recommend that action be taken to ensure that commercial operators of national broadcasting sites do not discriminate against or exclude any licensed community broadcaster wishing to gain access to prime transmission sites now effectively monopolised by commercial operators.<sup>35</sup>

5.46 Melbourne's 3MBS suggested a different approach to operating transmission sites:

3MBS' experience of analogue transmission facilities has also underlined the need to have control over transmitters. We would argue that the government enable community broadcasters to operate digital transmission facilities collectively, rather than exposing community stations to third party or commercial arrangements.<sup>36</sup>

5.47 CBAA recommended that core and targeted funding support should be indexed in key areas of rising cost such as transmission site access and transmission technology access.<sup>37</sup>

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33 PMBA, *submission no. 121*, p. 4.

34 Coral Coast Community Radio, *submission no. 95*, p. 6.

35 ArtSound FM, *submission no. 28*, p. 4.

36 3MBS, *submission no. 71*, p. 4.

37 CBAA, *submission no. 61*, p. 42.

## Committee comment

- 5.48 The Committee is of the opinion that the community broadcasting sector, a not-for-profit sector, should not be exposed to significant increases in transmission fees.
- 5.49 The Committee notes that the Australian Government provides a significant amount of funding to the sector to subsidise transmission costs. However the sector will cease to exist if transmission costs continue to escalate at current rates. This will result in the Australian Government having to increase its subsidisation of transmission costs unless an alternative is reached.
- 5.50 The Committee understands that private companies may charge market prices for their services, however the Committee is surprised by the particularly significant increases that not-for-profit community broadcasters have had to face in recent times.
- 5.51 The Committee notes the success of Community Service Obligations in other sectors in ensuring equity and access for community organisations. The Committee notes the option that the Australian Government has to make transmission for community broadcasting a Community Service Obligation. There is also concern that transmission access is an issue that warrants investigation.
- 5.52 The Committee recommends that an investigation be conducted by the Australian Government to determine if recent fee increases have been fair on community broadcasters, what charges should be levied against not-for-profit community broadcasters in the future, and to determine if any particular competition issues need to be addressed.

## Recommendation 12

The Committee recommends that the Australian Government conduct an investigation examining:

- increases in transmission fees for not-for-profit community broadcasters
- the impact of transmission fee increases on community broadcasters
- ways to monitor and regulate transmission fee increases for community broadcasters
- the potential for transmission for community broadcasters to be made a Community Service Obligation
- transmission access issues for community broadcasters
- any competition issues concerning transmission.

## Other technologies

5.53 CBAA discussed the use of other technologies by community broadcasters:

Innovative use of online technologies is well-established in the sector and the internet is well-used both as a resource base for information and programming but increasingly as an alternative or supplementary delivery platform via streaming and/or downloads (podcasting).<sup>38</sup>

5.54 CBAA elaborated:

Community broadcasting stations were amongst the first to take up internet streaming. More recently, stations such as 2FBI have made free podcasts available to listeners and subscribers. These services complement analogue technologies and expose community radio to an international audience.<sup>39</sup>

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38 CBAA, *submission no. 61*, p. 13.

39 CBAA, *submission no. 61*, p. 13.

5.55 The ACT Government also discussed new technologies:

The growth of new communications technologies, in conjunction with the emergence of more efficient digital distribution media, presages a new era of broadcasting, and communications. The Internet and 'pod-casting' are transforming conventional ways of receiving programming and distant radio stations, and other program sources are available to Australians in ever growing numbers.<sup>40</sup>

5.56 Many stations that made submissions to the inquiry indicated that they stream their services to the internet.<sup>41</sup>

5.57 For example, Melbourne's 3MBS stated that it operates a streaming service, allowing:

... people around the world to listen to the Australian musicians broadcast by the station. Listeners to the streaming service have registered from Europe, North America and Asia.<sup>42</sup>

5.58 Many Indigenous community broadcasters, particularly the regional network hubs, city stations and the more developed remote stations, take advantage of the internet:

4K1G in Townsville and CAAMA in Alice Springs stream their programming via the internet and are reaching a vast audience. Many communities are and many others want to access new technologies.<sup>43</sup>

5.59 New and developing technologies are used differently by particular community groups. Noosa Community Radio stated:

We have recognized that as youth are more involved with computerized technology, they tend to listen to radio that is streamed via the Internet.<sup>44</sup>

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40 ACT Government, *submission no. 122*, p. 4.

41 3RRR, *submission no. 110*, p. 2; 96five FM, *submission no. 36*, p. 4; Rainbow FM, *submission no. 18*, p. 3; 4BAY FM, *submission no. 11*, p. 4; SYN, *submission no. 126*, p. 4; Narrabri Shire Community Radio, *submission no. 48*, p. 2; 4EB FM, *submission no. 54*, p. 2; 4MBS, *submission no. 84*, p. 2; Light FM, *submission no. 77*, p. 3; TUNE! FM, *submission no. 81*, p. 3; Western Radio Broadcasters, *submission no. 21*, p. 5;

42 3MBS, *submission no. 71*, p. 2.

43 AICA, *submission no. 72*, p. 3.

44 Noosa Community Radio, *submission no. 73*, p. 3.

5.60 AFMN also discussed changing demographics and new technologies:

Internet streaming/podcasting ... is a developing technology and in time a substantial audience will develop but many listeners/supporters of the fine music network have not had the necessary technical background to access program material in this way. This will change as the current generation of computer literate people move into retirement.<sup>45</sup>

5.61 Brisbane's 4EB FM also discussed changing audience and technology:

New services such as Podcasting and digital broadcasting will be sought after by the younger segment of 4EB's listenership and will be a large part of 4EB's future. However, there has been a very small financial return from the investment in new technologies with changes in radio listenership patterns being much slower than the changes in technology.<sup>46</sup>

5.62 SYN discussed technological developments in its submission:

New technologies have completely changed audience's media consumption patterns. We believe that cross-platform productions can increase our volunteer involvement and pioneer new technologies and that community broadcasting has the potential to pioneer and be the incubator of many new ideas within digital broadcasting in Australia.<sup>47</sup>

5.63 SYN explained that media literacy for young people is as important as traditional literacy:

It gives students critical understanding and active participation, developing critical and creative abilities. The media is the major socializing influence in our society and the main means of cultural expression and communication: to become an active participant in public life necessarily involves making use of the modern media.<sup>48</sup>

5.64 SYN elaborated on the value of community broadcasting for young people:

As online technologies invariably involves media, posting a blog on a website, creating a video or radio piece to be heard by others, is essential for young people to engage more with school and society in general. Community broadcasting is capable of

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45 AFMN, *submission no. 40*, p. 5.

46 4EB FM, *submission no. 54*, p. 2.

47 SYN, *submission no. 126*, p. 10.

48 SYN, *submission no. 126*, p. 10.



providing organizational supports and structures to support this type of social connectedness.<sup>49</sup>

5.65 SYN discussed its streaming and podcasting services:

SYN currently simulcasts the radio broadcast on the internet and podcasts a number of flagship programs ... this has taken a great deal of organisational and structural ground work and support from SYN and is still under resourced and really in its emerging stages ... we are keen to continue and build our podcasting capabilities over the next 12 months.<sup>50</sup>

5.66 SYN also discussed digital content distribution and new media developments:

SYN is exploring opportunities to create unique content for new forms of media. There is certainly a rise in interest from our community in access to blogging, podcasting and general digital media creation. SYN is also exploring utilising mobile phone technologies to create video content for its television productions and audio for its radio programs.<sup>51</sup>

5.67 Sydney's 2SER considered the emergence of new technologies as both an opportunity and a threat to the sector:

The challenge [is] to fund the development of websites, audio on demand and streaming services, podcasting and cross-platform content, whilst maintaining and developing traditional broadcasting infrastructure, and to provide for the migration to digital radio broadcasting, is colossal.<sup>52</sup>

5.68 Sydney's 2SER discussed the importance of new services:

In order to maintain its relevance and to meet the growing expectations of media-savvy listeners, 2SER, and the sector, must be able to offer, and proffer from, these new services. 2SER's long-term survival is predicated upon its ability to do so.<sup>53</sup>

5.69 Sydney's 2SER acknowledged the benefits of new services:

... these services provide stations with the ability to increase interaction with listeners, to increase community participation and

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49 SYN, *submission no. 126*, p. 10.

50 SYN, *submission no. 126*, p. 10.

51 SYN, *submission no. 126*, p. 10.

52 2SER, *submission no. 118*, p. 5.

53 2SER, *submission no. 118*, p. 5.

to increase the listener base and thus potentially increase subscription and sponsorship income streams ...<sup>54</sup>

5.70 However, 2SER also considered new technologies as a threat:

Their proliferation is leading to a fragmentation of both audience and sponsorship/advertising budgets, so the mainstays of income generation for the majority of stations, listener subscription and sponsorship, are also threatened.<sup>55</sup>

5.71 ACB also considered the development of podcasting and the convergence of broadcasting and the internet as both an opportunity and a threat to the sector. ACB suggested that:

... funds should be allocated to explore these technologies allowing community broadcasters to become pro-active in making the best use of this development.<sup>56</sup>

5.72 Eastside Radio is concerned that new technologies may cost too much for smaller broadcasters:

We are constantly asked when will we be able to have online streaming and podcasting. The sad realisation is that new technology requires new equipment and training which of course costs money. We do not have the funds to explore such venture at the moment ...<sup>57</sup>

5.73 Artsound FM discussed the benefits of new technologies, but re-emphasised the value of local community broadcasting:

... the internet and podcasting techniques are transforming the conventional ways in which consumers receive their programming. Distant radio stations, and other program sources, whether domestic or international, private or public, are now available to Australians in ever growing numbers. But community radio will always hold up a mirror to the local community and provide recognizable voices and artists. Australians are entitled to as much choice in programming as changing technologies and technical distribution arrangements enable them to receive. However, 'choice' for Australians would be meaningless unless it

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54 2SER, *submission no. 118*, p. 5.

55 2SER, *submission no. 118*, p. 5.

56 ACB, *submission no. 106*, p. 14.

57 Eastside Radio, *submission no. 9*, p. 3.

also continues to include programming which reflects local community cultural heritage ...<sup>58</sup>

## Committee comment

- 5.74 The Committee is impressed by the number of community broadcasters embracing new ways for broadcasting their important services. There is no doubt that streaming to the internet, podcasting and other technologies will greatly enhance community broadcasting.
- 5.75 The Committee is disappointed that the new era of broadcasting utilising other technologies was not greatly emphasised by stations in their submissions to the inquiry.
- 5.76 The Committee understands that some stations may struggle with the cost of introducing new technologies at their stations. However, the Committee also recognises that some stations with very modest budgets have introduced broadcasting techniques such as internet streaming, which has benefited their station and extended their services to a wider audience.
- 5.77 The Committee notes that the opportunity for broadcasters to share content has escalated immensely with digital distribution. The Committee strongly encourages community broadcasters to become creative and innovative in the use of new technologies.

## Radio for the Print Handicapped

- 5.78 Vision Australia stated that utilisation of the internet for RPH delivery can:
- enable listeners to access live content where AM radio is not accessible
  - enable listeners to access content as audio on demand providing more timely and convenient access and increasing the opportunity for maximum use to be made of the content
  - showcase this specialized broadcasting format to the world.<sup>59</sup>
- 5.79 RPH stations are able to provide their services as they each hold a print disability radio licence under Section 47 of the *Copyright Act 1968* (the Copyright Act).<sup>60</sup>

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58 Artsound FM, *submission no. 28*, p. 3.

59 Vision Australia, *submission no. 107*, p. 9.

60 2RPH, *submission no. 101*, p. 4.

5.80 Sydney's 2RPH explained:

Holding these licences ensures that 'the making of a sound broadcast of, or of an adaptation of, a published literary or dramatic work does not constitute an infringement of copyright in the work ...' [Section 47A(1) of the Copyright Act]. This simplifies much of our operations by reducing what would otherwise be a huge overhead to clear copyright.<sup>61</sup>

5.81 Vision Australia explained that the primary barrier to utilisation of the Internet for RPH delivery is:

... current copyright provisions which do not automatically allow flow on of arrangements currently available to RPH broadcasters ... currently this provision does not apply to RPH programming on general community radio stations or to RPH content delivered via the Internet.<sup>62</sup>

5.82 Sydney's 2RPH pointed out that the Copyright Act does not exempt RPH service providers from copyright obligations should they wish to make their services available on the internet as a streaming audio service, or if they wished to provide audio content via a telephone service.<sup>63</sup>

5.83 Vision Australia discussed barriers that its services face:

Though RPH content is delivered via analogue radio, we are mindful that the need of the 'community' of interest' will be better served through such delivery pathways as the internet and digital radio. We look to the Commonwealth Government to help us overcome barriers to full utilisation of the digital technologies. These barriers include current copyright provisions, uncertainty about spectrum availability for digital transmission, and the need for funding to achieve transition to digital transmission.<sup>64</sup>

5.84 The Attorney-General conducted a review of the Copyright Act in 1998. That review considered copying for people with disabilities, and commented on other forms of transmission:

The Committee notes that it is possible for services for people with a print disability to be transmitted online – for example, over the internet – as well as broadcast as radio programs. These services may also attract a wider audience than just those people with a

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61 2RPH, *submission no. 101*, p. 4.

62 Vision Australia, *submission no. 107*, p. 9.

63 2RPH, *submission no. 101*, p. 4.

64 Vision Australia, *submission no. 107*, p. 8.

print disability. In this situation, the Committee considers that the 'sole purpose' test should also apply to such transmissions.<sup>65</sup>

5.85 Sydney's 2RPH commented that while this report raised the issue of delivery of RPH services over the internet, no action was taken at that time.<sup>66</sup>

5.86 Sydney's 2RPH explained its rationale for seeking to stream their service to the internet:

It is our view that such a streaming service would be listened to predominantly by persons with a print handicap who lived outside the primary coverage area of existing RPH transmitters, or in poor reception pockets. As such it would provide a valuable service to this class of people. While there is no doubt that such a streaming service could also be listened to by some persons without a print handicap, the same situation already exists with our present radio broadcasts.<sup>67</sup>

5.87 Sydney's 2RPH added:

The issue of the extent to which such broadcasts would be listened to by people overseas should not, in our view, be a major practical concern.<sup>68</sup>

5.88 Sydney's 2RPH discussed its preference for the broadcasting of its service:

We would prefer an arrangement in regard to print handicapped services in Australia, which enabled direct access to RPH radio services by internet streaming technology and which did not require costly, complex and difficult to manage registration/eligibility processes. i.e. an internet streaming arrangement that mirrored the present RPH radio services, but extended to all persons in Australia.<sup>69</sup>

5.89 Sydney's 2RPH added:

The issue of streaming our programming over the internet is an important medium term objective for 2RPH. Without some resolution of the matters raised in this section of our submission

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65 Attorney-General's Department, *Simplification of the Copyright Act 1968*, September 1998, <[www.ag.gov.au/agd/WWW/clrHome.nsf/Page/Overview\\_Reports\\_Simplification\\_of\\_the\\_Copyright\\_Act:\\_Part\\_1](http://www.ag.gov.au/agd/WWW/clrHome.nsf/Page/Overview_Reports_Simplification_of_the_Copyright_Act:_Part_1)>, accessed 3 May 2007.

66 2RPH, *submission no. 101*, p. 4.

67 2RPH, *submission no. 101*, p. 4.

68 2RPH, *submission no. 101*, p. 5.

69 2RPH, *submission no. 101*, p. 5.

we could be severely restricted in the range of programming we might deliver in this way.<sup>70</sup>

5.90 While the *Copyright Amendment Act 2006* was passed in late 2006, it appears that this amending Act did not consider the issue of internet streaming for RPH services.<sup>71</sup>

5.91 Vision Australia's submission recommended that:

... the Commonwealth Government amend the Copyright Act provision in Section 47 A of a statutory licence for RPH licensees to be extended to encompass delivery over the Internet and on general community licensed stations by accredited RPH program makers.<sup>72</sup>

### Committee comment

5.92 The Committee is concerned that vital RPH services may not be available to those Australians that need them.

5.93 There may be a significant number of Australians that are not able to receive RPH radio broadcasts. There may also be a substantial number of people that prefer to listen to broadcasts on their computer, or download broadcasts to listen to at a later time.

5.94 The Committee is of the opinion that the provisions of the statutory licence under the Copyright Act should be extended to non-RPH community broadcasters, provided that those broadcasters are utilising material from accredited RPH content providers.

5.95 The Committee is of the opinion that RPH services should be broadcast on the internet.

5.96 The Committee understands that an appropriate statutory licence is required for the broadcast of RPH services on the internet. The Committee recommends that the Australian Government amend the Copyright Act to allow RPH services to be broadcast on the internet, either as a streamed broadcast or downloadable files.

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70 2RPH, *submission no. 101*, p. 5.

71 Copyright Amendment Act information sheet, <[www.copyright.org.au/news/newsbytopic/changesnews/u27261](http://www.copyright.org.au/news/newsbytopic/changesnews/u27261)>, accessed 3 May 2007; <[www.aph.gov.au/Senate/committee/legcon\\_ctte/copyright06/index.htm](http://www.aph.gov.au/Senate/committee/legcon_ctte/copyright06/index.htm)>, accessed 3 May 2007.

72 Vision Australia, *submission no. 107*, p. 10.

**Recommendation 13**

The Committee recommends that the Australian Government amend the *Copyright Act 1968*, extending the Section 47A statutory licence to enable community radio broadcasting licensees to broadcast sound material that is provided to those broadcasters by approved Radio for the Print Handicapped organisations.

**Recommendation 14**

The Committee recommends that the Australian Government amend the *Copyright Act 1968*, creating a new statutory licence to:

- enable Radio for the Print Handicapped service providers to stream material on the internet
- enable Radio for the Print Handicapped material to be made available by way of download from Radio for the Print Handicapped websites.

This new statutory licence should be available to:

- print disability or Radio for the Print Handicapped licensees
- community radio broadcasting licensees, but only for material for which the expanded Section 47A relates.





## Conclusion

- 6.1 The Committee recognises the immense value that the community broadcasting sector contributes to Australian society. The Committee is thoroughly impressed by the quality of programming produced by broadcasters and the dedication and commitment shown by the sector's volunteers.
- 6.2 Although the Australian Government's contribution to the sector has been significant, the Committee feels that a substantial boost in core funding, with annual indexed increases, will ease the financial pressures on community broadcasters, allowing them to continue to provide valuable services to their communities. In particular, the Committee sees great value in providing funding for paid station managers and is of the opinion that better management practices will lead to a more robust community broadcasting network.
- 6.3 The Committee recommends an increase in targeted funding over the next four years to address more urgent problems that the sector faces. In particular, the increase in funding should contribute significantly to the update or replacement of community broadcasting infrastructure. Indigenous broadcasters in particular should be assisted by this increase in targeted funding.
- 6.4 The Committee recognises the importance of regional and rural broadcasters, particularly as they are often the only source of local information and entertainment for many areas. The Committee trusts that the Australian Government will ensure that regional and rural broadcasters are not financially disadvantaged when compared to their metropolitan and suburban counterparts.
- 6.5 The Committee considers that the amounts of funding recommended in this report are not substantial. The Committee also understands that the

- Australian Government has a significant budget surplus in the next financial year.
- 6.6 Therefore, the Committee recommends that, despite the budget and funding levels having been announced, the Australian Government implement the funding recommendations presented throughout this report for the 2007-08 financial year.
- 6.7 An increase in targeted funding will be of enormous benefit to the sector in terms of upgrading infrastructure. However, the Committee believes that stations should not rely on funding in the long term for the replacement of equipment. The Committee's governance recommendations should see an increased level of effective station management, including better financial and forward planning. A significant boost in funding for business management training will also make a great contribution to effective governance in the sector.
- 6.8 The Committee recognises that the Australian Communications and Media Authority's regulation of the sector is a difficult task. The Committee anticipates that its recommendations for the regulator will clarify guidelines for stations and assist in reducing the number of breaches and complaints.
- 6.9 The Committee strongly urges the Australian Government to conduct an investigation into recent transmission fee increases for community broadcasters, and determine what are appropriate charges for not-for-profit community broadcasters.
- 6.10 The Committee has made some brief yet very important recommendations concerning the Copyright Act and Radio for the Print Handicapped services. The Committee urges the Australian Government to act quickly with regard to those recommendations so that providers may extend their services to those Australians in most need.
- 6.11 Community broadcasters now reach a significant audience. The Committee is puzzled by the Australian Government's reluctance to advertise on community broadcasting stations and urges it to take the opportunity to reach a greater number of Australians.
- 6.12 The Committee tabled its first report for this inquiry in February 2007. That report dealt with the important issue of access to digital spectrum for community television.
- 6.13 The Committee notes that there has not been an Australian Government response to that particular report, despite the urgency of the issue and the

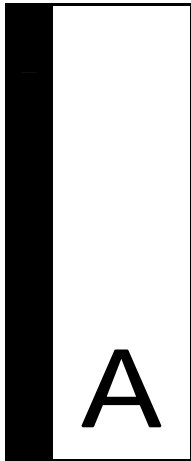
- Committee's decision to table the report early in the year prior to Government budget decisions.
- 6.14 Additionally, the Committee was disappointed to note that there was no consideration given to community television in the 2007-08 Federal Budget.
- 6.15 The Committee considers it will be the death knell for community television if it does not gain access to digital spectrum before the end of 2007.
- 6.16 Some community television stations are already very close to ceasing their operations. In fact, it is understood that the closure of one particular broadcaster can be partially attributed to the uncertainty of access to digital spectrum.
- 6.17 The Committee understands that some community television stations are currently surviving only with the support of particular state governments. One particular station recently was informed that its state funding would be withdrawn if the station could not guarantee access to digital spectrum. Despite that particular situation being resolved the outlook is still bleak for community television stations.
- 6.18 Again, the Committee strongly urges the Australian Government to implement the recommendations of the first report for this inquiry.
- 6.19 The key findings from the first report recommended that the Australian Government:
- sell the unreserved channel known as Licence A, with an obligation to be placed on the new licensee to carry community television during the simulcast period
  - at analogue switch-off convert the spectrum band known as Channel 31 to digital and permanently allocate it to current and future community broadcasters
  - provide funding of \$6 million to the community television sector for the conversion of broadcast equipment to digital
  - provide funding of \$1.7 million per year to the community television sector for each year of simulcast.
- 6.20 The Committee also requests that the Australian Government respond promptly to this second report, given the value of the community broadcasting sector and the modest requests made for increased funding.

- 6.21 This second report concludes the Committee's inquiry into community broadcasting. The Committee thanks all those individuals, stations, peak bodies and other organisations that made important contributions to the inquiry in the way of submissions and at public hearings.

**Hon Jackie Kelly**

**Committee Chair**

**20 June 2007**



## Appendix A - List of Submissions

- 1 Rhema FM 105.7FM
- 1.1 Rhema FM 105.7FM
- 2 Ms Linda Campbell
- 3 Mr Richard Newby
- 3.1 Mr Richard Newby
- 3.2 Mr Richard Newby
- 3.3 Mr Richard Newby
- 3.4 Mr Richard Newby
- 3.5 Mr Richard Newby
- 4 Bushvision Inc
- 5 Minister for Indigenous Affairs, Tourism, Culture and the Arts
- 6 Wagga's 101.9 Life FM
- 7 Australian Broadcasting Corporation
- 8 Radio Alexandrina (Alex-FM) Community Broadcasters Association Inc
- 9 Eastside Radio 89.7fm
- 10 Ms Doris Freris

- 11 Bayside Community Radio Association Inc
- 12 South Gippsland Community Radio Inc
- 13 Northern Territory Department of Corporate and Information Services
- 14 Community Media Services
- 15 Channel 68 LINC TV
- 16 89.7 FM Tamworth - Peel Valley Christian Broadcasters Inc
- 17 HUON FM
- 18 89.3 4CCC Rainbow FM
- 19 National Indigenous Radio Service
- 20 Fbi 94.5 FM Sydney
- 21 Western Radio Broadcasters Inc Stereo 974
- 22 Community Radio Coraki Association Inc.
- 23 Cooloola Christian Radio Inc
- 24 Orange Community Broadcasters Inc. FM 107.5
- 25 Dr Neil Runcie
- 26 3CR Community Radio
- 27 Radio Northern Beaches
- 28 Artsound FM 92.7
- 29 Radio East Gippsland 90.7 & 105.5 FM
- 30 Great Ocean Radio 3WAY-FM 103.7
- 31 Metro Screen
- 32 Progressive Community Radio Inc
- 33 Whyalla FM Public Broadcasting Association Inc.
- 34 Mr Vincent O'Donnell MA
- 35 Access 31 Perth
- 36 Family Radio Limited
- 37 Wagga Wagga Community Media Inc. FM 107.1 Two AAA
- 38 Bay & Basin FM

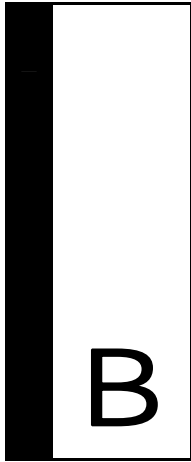
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- 39 Mr Bruce Carty
  - 40 Australian Fine Music Network
  - 41 World Music Radio Inc.
  - 42 96.5 Spirit FM
  - 43 Hunter Community Television (Novacast)
  - 44 Upper Goulburn Community Radio Inc
  - 44.1 Upper Goulburn Community Radio Inc
  - 45 Inner North East Community Radio (96.5 INNER FM)
  - 46 Mitchell Community Radio OKR FM 97.1
  - 47 Radio Logan Inc. (101FM)
  - 48 Narrabri Shire Community Radio Inc
  - 49 Ryde Regional Radio (2RRR)
  - 50 Mr Shane Moore
  - 51 PY MEDIA
  - 52 Mr Peter James
  - 53 The Octapod Organisation
  - 54 The Ethnic Broadcasting Association of Queensland Limited
  - 55 Yarra Valley FM Inc
  - 56 Open Spectrum Australia (Community Spectrum Taskforce)
  - 57 WARP Inc
  - 58 Mr Darce Cassidy
  - 59 Broadcast Australia Pty Limited
  - 60 Top End Aboriginal Bush Broadcasting Association
  - 61 Community Broadcasting Association of Australia
  - 61.1 Community Broadcasting Association of Australia
  - 61.2 Community Broadcasting Association of Australia
  - 62 Mr Rob Harling
  - 63 Sutherland Shire Community Radio Association Inc.

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- 64 Multicultural Community Radio Association Inc.
  - 65 Tasman FM
  - 66 Department of Industry & Resources - WA
  - 67 Bega Access Radio Committee
  - 68 Golden Days Radio for Senior Citizens Inc.
  - 69 Mr Murray Peterson
  - 70 Southern Cross Broadcasting Australia Limited
  - 71 3MBS
  - 72 Australian Indigenous Communications Broadcasting
  - 73 Noosa Community Radio
  - 74 Asian Television Australia Association Inc
  - 75 Department of Communications, Information Technology and the Arts
  - 75.1 Department of Communications, Information Technology and the Arts
  - 75.2 Department of Communications, Information Technology and the Arts
  - 75.3 Department of Communications, Information Technology and the Arts
  - 76 Gippsland FM 104.7
  - 77 LIGHT FM Inc.
  - 78 The Voice 99.9FM
  - 79 C31 Adelaide Limited (TV)
  - 80 National Indigenous Television (NITV Committee)
  - 81 TUNE 106.9 FM
  - 82 Radio KLFM - Bendigo FM Education Broadcasters Inc.
  - 83 Ethnic Broadcasters' Council
  - 84 4MBS Classic FM
  - 85 Radio EMFM
  - 86 Multicultural Radio & TV Association of WA Inc



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- 87 Community Radio Station 2RDJ FM 88.1
  - 88 Port Stephens FM - 100.9
  - 89 Associate Professor Michael Meadows, Dr Susan Forde, Dr Jacqui Ewart and Ms Kerrie Foxwell
  - 90 SBS Corporation
  - 91 Phonographic Performance Company of Australia Limited
  - 92 Australian recording Industry Association
  - 93 Department of Immigration and Multicultural Affairs
  - 94 Aboriginal Resource & Development Services Inc.
  - 95 Coral Coast Community Radio 94.7 FM
  - 96 3HOT FM
  - 97 FM 98.5
  - 97.1 FM 98.5
  - 97.2 FM 98.5
  - 98 Umeewarra Aboriginal Media Association
  - 99 CTV Perth Inc
  - 100 Macquarie Regional Radioworks
  - 101 Sydney's Radio Reading Service (1224AM 2RPH)
  - 102 C31 Melbourne
  - 102.1 C31 Melbourne
  - 103 Federation of Ethnic Communities' Councils of Australia Inc.
  - 104 5TCB FM
  - 105 92.3FM ZZZ Melbourne Ethnic Community Radio
  - 106 Association of Christian Broadcasters
  - 107 Vision Australia
  - 108 National Ethnic and Multicultural Broadcasters' Council
  - 109 Commercial Radio Australia Limited
  - 110 Triple R Broadcasters
  - 111 Radio Five-O-Plus

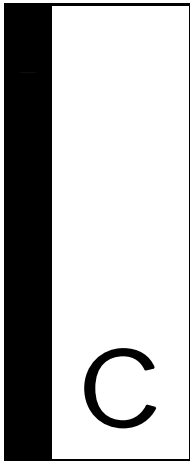
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- 112 National Radio News
  - 113 3KND/South East Indigenous Media Association
  - 113.1 3KND/South East Indigenous Media Association
  - 114 Community Broadcasting Foundation
  - 114.1 Community Broadcasting Foundation
  - 115 Australian Communications and Media Authority
  - 115.1 Australian Communications and Media Authority
  - 116 NSW Government
  - 117 8CCC FM
  - 118 2SER-FM 107.3 Sydney Education Broadcasting Limited
  - 119 South Australian Multicultural & Ethnic Affairs Commission
  - 120 Minister for Health - Government of South Australia
  - 121 Progressive Music Broadcasting Association
  - 122 Chief Minister's Department Cabinet & Policy
  - 123 Australia Council of the Arts
  - 124 Deepwater & District Community FM Inc - 2CBD FM
  - 125 CONFIDENTIAL
  - 125.1 CONFIDENTIAL
  - 126 SYN 90.7 Melbourne
  - 127 North Coast Radio Inc. - 2NCRFM 92.9
  - 128 Mr Lee Hubber
  - 129 Sylvester Caraway
  - 129.1 CONFIDENTIAL
  - 130 CONFIDENTIAL
  - 131 Wasabi TV



## Appendix B - List of Exhibits

- 1 Highland FM 107.1  
*Highland FM 107.1*
  
- 2 3CR Community Radio  
*Beyond The Bars 2 Prison Broadcasts & The Diy Arts Show*  
(Related to Submission No. 26)
  
- 3 Griffith University  
*Culture Commitment Community - the Australian community radio sector*
  
- 4 Community Broadcasting Foundation
  
- 5 5TCB Part of the Family  
*Tatiara Community FM Broadcasters Inc. 5TCB - Business Plan as at 2004*  
(Related to Submission No. 104)

- 6 Australian Indigenous Communications Broadcasting  
*Submission on Backing Indigenous Ability*  
(Related to Submission No. 72)
  
- 7 Australian Indigenous Communications Broadcasting  
*Annexure A - Historical Level of Indigenous Broadcasting  
Founding and the other comments on Submission*  
(Related to Submission No. 72)
  
- 8 C31 Melbourne & Victoria
  
- 9 CONFIDENTIAL
  
- 10 The Octapod Organisation
  
- 11 Community Broadcasting Foundation  
*Community Broadcasting Foundation - Foundation Submission*



## Appendix C - List of Hearings and Witnesses

**Wednesday, 24 May 2006 - CANBERRA**

**Triple R**

Ms Kath Letch, Station Manager

**Wednesday, 31 May 2006 - CANBERRA**

**Community Broadcasting Association of Australia**

Ms Jan Forrester, Consultant

Mr Paul Mason, Senior Project Manager, Australian Music Radio  
Airplay Project

Mr Barry Melville, General Manager

Mr Paul Terdich, President

**Wednesday, 14 June 2006 - CANBERRA**

**Community Broadcasting Foundation**

Mr John Martin, President

Mr Ian Stanistreet, Executive Director

**Wednesday, 21 June 2006 - CANBERRA****Australian Indigenous Communications Broadcasting**

Mr Patrick Malone, Chief Executive Officer

**The Australian Indigenous Communications Association**

Mr George Villaflor, Project & Research Officer

**Thursday, 20 July 2006 - MELBOURNE****3KND/South East Indigenous Media Association**

Mr Peter Johnson, Committee Member, Australian Indigenous  
Communication Association

**92.3FM ZZZ Melbourne Ethnic Community Radio**

Mr Martin Wright, Station Manager

**C31 Melbourne & Victoria**

Mr Greg Dee

Mr Peter Lane, Chairperson of the MCTC Board

Mr Peter McArthur, President of the MCTC Board

**Channel 31 - Melbourne Community Television Consortium**

Ms Carly O'Donovan, Programming Manager

**Ethnic Broadcasters' Council - VIC**

Ms Joanna Curtin, Assistant Station Manager

**National Ethnic and Multicultural Broadcasters' Council**

Mr Timothy Tolhurst, Executive Officer

Mr George Zangalis, President

**Vision Australia**

Mr Tim Evans, General Manager - Business Development

Mr Stephen Jolley, Manager

Mr Michael Simpson, General Manager Policy & Advocacy

**Western Radio Broadcasting Incorporated**

Mr Rodney Boyd, General Manager

**Friday, 21 July 2006 - ALICE SPRINGS****8CCC Community Radio Inc**

Maria, Acting Station Manager

Mr Miguel Ociones, President

**CAAMA**

Mrs Priscilla Collins, Chief Executive Officer

**Central Australian Aboriginal Media Association**

Mr James Remedio, Radio Manager

**Top End Aboriginal Bush Broadcasting Association**

Ms Ella Geia, General Manager

**Wednesday, 9 August 2006 - CANBERRA****Community Spectrum Taskforce**

Mr Leo Berkeley, Chair

**Community Taskforce Secretariat**

Ms Amy Herbohn

**Wednesday, 16 August 2006 - CANBERRA****3KND/South East Indigenous Media Association**

Mr Peter Johnson, Committee Member, Australian Indigenous  
Communication Association

**National Indigenous Television**

Ms Michelle Harrison, Project Manager

**Wednesday, 6 September 2006 - CANBERRA**

**98.5 Sonshine FM**

Mr Barry Grosser, General Manager

**Association of Christian Broadcasters**

Mr David Turrell, Development Manager

**Wednesday, 13 September 2006 - CANBERRA**

**Department of Communications, Information Technology and the Arts**

Ms Jennifer Levy, Manager, Community Broadcasting

**Department of Communications, IT and the Arts**

Dr Simon Pelling, Acting Chief General Manager, Community  
Broadcasting

**Wednesday, 1 November 2006 - CANBERRA**

**Department of Communications, Information Technology and the Arts**

Ms Jennifer Levy, Manager, Community Broadcasting

**Department of Communications, IT and the Arts**

Dr Simon Pelling, Acting Chief General Manager, Community  
Broadcasting

**Wednesday, 29 November 2006 - CANBERRA**

**Australian Broadcasting Authority**

Mr Giles Tanner, General Manager, Inputs to Industry Division

**Australian Communications and Media Authority**

Ms Lyn Maddock, Deputy Chair

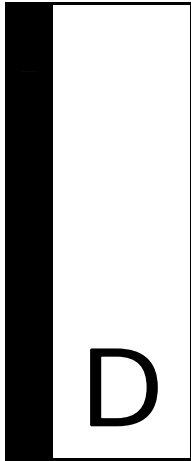


**Wednesday, 28 February 2007 - CANBERRA**

**Griffith University**

Associate Professor Michael Meadows, Associate Professor of  
Journalism





## Appendix D - List of Inspections

### **Wednesday, 19 July 2006, Melbourne**

C31 Melbourne

3ZZZ/Melbourne Ethnic Community Radio

3KND/South East Indigenous Media Association

3RRR/Triple R Broadcasters Ltd

### **Thursday, 20 July 2006, Melbourne**

3RPH/Vision Australia

### **Friday, 21 July 2006, Alice Springs**

CAAMA - Central Australian Aboriginal Media Association



# E

## Appendix E - Station Income

1.1 In its submission, CBF presented an analysis of community radio income and expenditure for 262 stations for the 2002-03 financial year.

Station Type (n) (% of all)	Total income	Total expenditure	Average income	Average exp.	Average surplus/loss
All stations (262) (100)	46,584,804	45,013,842	177,805	171,809	5,996
stations earning <\$500k. (236) (90)	26,298,809	25,243,897	111,436	106,966	4,470
stations earning >\$500k. (26) (10)	20,285,995	19,769,946	780,231	760,383	19,848
Metropolitan (53) (10)	26,34,709	25,534,362	504,428	481,780	22,648
Suburban (42) (16)	3,899,816	3,402,530	93,082	81,013	12,069
Regional (94) (36)	8,308,186	237,652	88,385	87,635	750
Rural (73) (28)	7,642,094	7,839,299	104,686	107,388	-2,702
General (169) (64)	20,624,120	19,590,107	122,036	115,918	6,118
Religious (34) (13)	9,475,968	9,376,189	278,705	275,770	2,935
Indigenous (non RIBS) (22) (8)	7,171,929	7,753,233	325,997	352,420	-26,423
RPH (14) (5)	2,120,428	1,899,955	151,459	135,711	15,748
Ethnic (7) (3)	3,218,597	2,821,517	459,800	403,074	56,726
Youth (6) (2)	983,690	827,495	163,948	137,916	26,032
Seniors (5) (2)	385,069	328,140	77,014	65,628	11,386
Fine Music (5) (2)	2,605,004	2,417,207	521,001	483,441	37,560

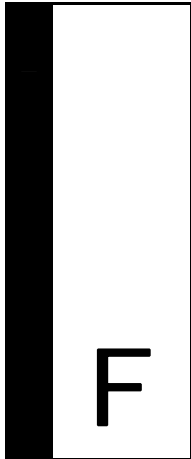
Source CBF, submission no. 114, p. 11.

1.2 CBF provided clarification on some of the data:

As noted at p.20 of the ACMA survey the results for rural stations have been distorted by the strong presence of 15 Indigenous stations in the sample. Indigenous stations receive operational funding from the DCITA Indigenous Broadcasting Program that accounted for almost 46% of total rural station income. When this amount is removed from the data the average income for the remaining 58 rural stations is \$71,526. Non-Indigenous rural community radio stations actually have the lowest average income of any station type.<sup>1</sup>

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1 CBF, *submission no. 114*, p. 11.



## Appendix F - List of Stations

<b>Name of Organisation or Submitter</b>	<b>Station ID</b>	<b>Location</b>
Rhema	FM 105.7	Mount Isa, QLD
Wagga's Life	101.9 FM	Wagga Wagga, NSW
Radio Alexandrina Community Broadcasters Association	ALeX-FM	Goolwa, SA
Eastside Radio	89.7FM – Jazz Plus	Paddington, NSW
Bayside Community Radio Association	4BAY	Cleveland, QLD
South Gippsland Community Radio	3MFM	Inverloch, VIC
Channel 68 LINC TV	68 LINC TV	Lismore, NSW
Rhema - FM	89.7 FM	Tamworth, NSW
Huon FM	95.3 FM	Geeveston, TAS
Rainbow FM	4CCC - 89.3	Warwick, QLD
National Indigenous Radio Service	NIRS	Fortitude Valley, QLD
FBi	94.5 FM	Strawberry Hills, NSW
Western Radio Broadcasters	stereo 97.4 FM	Sunshine, VIC
Community Radio Coraki Association	2RBR FM / 88.9FM	Coraki, NSW
Cooloola Christian Radio	FM 91.5	Gympie, QLD

Orange Community Broadcasting	FM 107.5	Orange, NSW
3CR - Community Radio	3CR	Collingwood, VIC
Radio Northern Beaches	88.7 & 90.3 FM	Belrose, NSW
ArtSound	FM 92.7	Curtin, ACT
Radio East	90.7 & 105.5 FM	Lakes Entrance, VIC
Great Ocean Radio -3 Way	FM 103.7	Warrnambool, VIC
Wyong-Gosford Progressive Community Radio	PCR FM	Gosford, NSW
Whyalla FM Public Broadcasting Association	5YYY FM	Whyalla, SA
Access TV 31	TV C31	Cloverdale, WA
Family Radio Limited	96.5 FM	Milton BC, QLD
Wagga Wagga Community Media	2AAA FM 107.1	Wagga Wagga, NSW
Bay and Basin FM	92.7	Sanctuary Point, NSW
96.5 Spirit FM	96.5 FM	Victor Harbour, SA
Hunter Community Television	NOVACAST - HCTV	Carrington, NSW
Upper Goulbourn Community Radio	UGFM	Alexandra, VIC
Inner North East Community Radio	96.5 INNER FM	Heidelberg, VIC
Mitchell Community Radio	OKR FM 97.1	Kilmore, VIC
Radio Logan	101 FM	Logan City DC, QLD
Narrabri Shire Community Radio	91.3	Narrabri, NSW
Ryde Regional Radio	2RRR	Alice Springs, NT
The Ethnic Broadcasting Association of Queensland Limited	4EB FM	East Brisbane, QLD
Yarra Valley FM	3VYV - FM 99.1	Woori Yallock, VIC
Ryde Regional Radio	2RRR - 88.5 FM	Gladesville, NSW
Sutherland Shire Community Radio Association	2SSR FM - 99.7 stereo	Sutherland, NSW



Multicultural Community Radio Association	Radio 2000 - FM 98.5	Burwood, NSW
Tasman FM	97.7	Nubeena, TAS
Bega Access Radio Committee	Edge FM 93.7	Bega, NSW
Golden Days Radio for senior Citizens	95.7	Sandringham, VIC
Classically Melbourne 3MBS	103.5 FM	Kew, VIC
Noosa Community Radio	FM 101.3	Tewantin, QLD
Gippsland	FM 104.7	Morwell, VIC
LIGHT FM	89.9 FM	Mont Albert, VIC
The Voice	99.9 FM	Ballarat, VIC
TUNE	106.9 FM	Armidale, NSW
Radio KLFM	3EON	Bendigo, VIC
Ethnic Broadcaster's Councill	FM 91.1	Weston, ACT
4MBS Classic FM	103.7 FM	Cooparoo, QLD
Radio EMFM	3 GRR - 104.7 FM	Echuca, VIC
Multicultural Radio and Television Association	6EBA 95.3 FM	North Perth, WA
Community Radio Station 2RDJ	FM 88.1	North Perth, WA
Port Stephens	FM 100.9	Salamander Bay, NSW
Coral Coast Radio	94.7 FM	Bundaberg, QLD
3HOT FM	106.7 FM	Mildura, VIC
Goulburn Valley Community Radio	FM 98.5	Shepparton, VIC
Sydney's Radio Reading Services	1224 AM 2 RPH	Glebe, NSW
C31 Melbourne	Channel 31	Melbourne, VIC
Part of the Family	5tcb FM	Bordertown, SA
Melbourne Ethnic Community Radio	92.3FM ZZZ	Collingwood, VIC
3RRR Triple R Broadcasters	3RRR	Brunswick East, VIC
Radio Five-O-Plus	93.3 FM	Gosford, NSW

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South East Indigenous Media Association	3KND	Preston, VIC
Upfront Outback Radio	8CCC	Alice Springs, NT
Sydney Educational Broadcasting Limited	2SER-FM 107.3	Broadway, NSW
Deep Water and District Community FM	2CBD FM	Glen Innes, NSW
SYN	90.7 FM	Melbourne, VIC
North Coast Radio	2NCRFM 92.9	East Lismore, NSW

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