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Submission 62



16 March 2006

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

To whom it may Concern,

RE: COMMUNITY BROADCASTING INQUIRY

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

I am a very active participant in the world of community radio in and around Queensland. Currently I am actively involved in four stations in Queensland, three of which are in the south-east corner of the state. I act in the role of Chairman for one station, on the board of another, and act as an adviser to two others. I am also on the board of a co-owned community radio transmission facility at Mt Coot-tha in Brisbane. I act as a technical adviser to all of the above organizations. All roles are on a voluntary basis.

As a result of my involvement, I believe I have some "feel" for the issues facing community broadcasters and believe that I may be able to contribute something of value to the inquiry. I have only addressed a couple of issues here as I those issue

Coming from a commercial background, after being involved in the ambitious not for profit organizations that I am, and seeing the positive impact they are making, I passionately support the work of community broadcasters.

In the attached I have commented on the specific terms of reference that the inquiry will investigate on, sharing my own experiences and insights.

Rob Harling

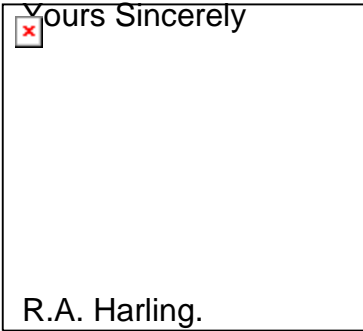
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Please feel free to contact me on 0417646355 or email me at projects@telecasters.com.au should you have any comments or further questions regarding this submission.

Thank you for your consideration.

Regards,

A rectangular box with a black border, containing a small red 'x' icon in the top-left corner. The text 'Yours Sincerely' is positioned at the top of the box, and 'R.A. Harling.' is at the bottom. The rest of the box is empty, indicating a redacted signature.

Yours Sincerely

R.A. Harling.

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COMMUNITY BROADCASTING INQUIRY: Rob Harling

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

In the organizations I am involved with, I am witnessing, in those established organizations, measurable positive impact on the communities being served and also listeners outside of the core community of interest.

In those emerging organizations, where there is commitment to improve the quality of their programming and presentation, we are seeing quite strong growth in listener-ship with a strong positive and encouraging response from the community as a result.

Most of the stations I am concerned with are Christian Community stations, but I am also assist with two youth/alternative music stations an ethnic broadcaster and a jazz music station.

I believe that scope of some of the community broadcasters is changing, as a result of the growing discontent the Australian public have with Commercial radio programming. This is very evident in the case of a number of stations that I am involved with, as they are now considered very favorable alternatives to mainstream commercial radio, and attract a significant listener-ship from, and outside of the community of interest. That is the scope of the community stations is increasing, but not as a result of their direct efforts, but as a result of the lack of substance in the commercial sector programming.

The core issues behind this change I believe, is that commercial radio has as its primary goal, financial gain from their operation. With diminished emphasis in last thirty years, on broadcasters to be socially responsible and with lack of concern for the welfare of the community that digests their product, ethical standards, the quality of program subjects, the standard of maturity and character of presenters, have dropped appreciably. The drive for financial gain has generated a demand by programmers for sensationalism, and anything that can catch the ear of a listener for an extra second or two. It also means that, in an attempt to gain maximum listener-ship, management and programmers have begun programming for the lowest common denominator, in the hope that they will entice greater numbers of listeners.

This generates a negative, depressing and ultimately unhelpful atmosphere for many listeners, but they feel they have no alternative and have only a choice of a handful of less than desirable options.

In my experience, in regard the Christian Community stations I represent, feedback from the community of interest and the wider community commenting on these issues in the light of programming offered by the community stations usually includes the following comments:

- a. Happy with the program content, sighting
 - i. Announcers comments are positive and no inuendo's
 - ii. Song lyrics are encouraging rather than negative
- b. Safe for the kids to listen to, without parents having to "veto" messages, or have to explain an "adult" comments to their inquisitive children
- c. The tone of sponsorship messages is not "hard sell"
- d. Actually promotes healthy family life, and interaction.
- e. The sound of the station makes them "happy" rather than depressed.
- f. They found and commenced listening to the station after becoming sick of listening to "rubbish" on the commercial stations
- g. Makes them consider the deeper issues of life and the impact on their lives

It is of great concern to me that Commercial radio has little or no regard for the impact of their programming on the mood of the community.

This is so clearly seen in the contrast indicated by our growing number of listeners, who have indicated that, should we cease to exist for any reason, they would rather turn off than go back to listening to commercial radio.

This is an interesting trend and one reflected in the United States also in research done since the "9/11" attacks. (Troy Research, Gahanna Ohio 2005/2006 "What's So Great About Christian Radio?")

Apart from programming, Community Radio also offers a number of other advantages also lacking in the commercial radio sector.

I have included for the record an example of the work that 965 Family Radio in Brisbane is engaged in:

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

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

Training and encouragement of volunteers and budding announcers has been sadly lacking in Commercial Radio for the last 20 years or so.

Interestingly, many Commercial Radio staff started their careers in Community Radio, as their was no opportunity to learn and “come up to speed” in the Commercial Radio world.

Other areas of interaction with the community include those technologies offered by the internet.

We are seeing substantial interest in online interaction from listeners, who want to influence the programming of the station and “have their say” in what we play and what we do in the community. We have developed interactive web pages in a number of the stations and offered quality web streaming for those who find that delivery medium more suitable for their situation.

As an indication of the popularity of this, 96five’s website at www.96five.com averages over 1,000,000 hits per month and anywhere from 15,000 to 25,000 sessions per month. In excess of 400 user “listeners” at any given time take our streaming service. With improvements to this service and promotion of it, we believe this number will double or triple in the near future.

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

In the case of contemporary Christian Community Radio stations, most are committed not only to supporting the Australian Community in its entirety and endorsing the positive values of the Australian "fair go" ethic, but also encouraging those in their listener-ship to develop positive relationships in all parts of the Australian culture.

Most of these stations have committed to generate relevant programs that not only fit the Australian ethos but endeavor to strengthen it.

Recently one of the Christian stations I am involved with supported a Moslem group who were seeking to raise funds to support relatives and their villages affected by the Tsunami. They sought to encourage that community that while of a different faith, that did not exclude them from "our community of interest"

A number of the stations I am involved with are actively engaged in weekly school and on-air programs that seek to encourage School children, to make wise life and social choices in their lives. This is supported by known sporting identities that relate of their life experiences.

These programs also encourage racial and religious tolerance amongst young people, also learning to value their lives and those of others around them also.

These programs have been strongly supported by the Schools and have generated very positive responses from the children and teaching staff.

One station has commenced a program of encouraging listeners to look out for their friends. Should a friend be in serious need, they were encouraged to contact the station, who would endeavor to assist in whatever way is needed through broadcasting those needs and utilizing the resources of other listeners to help meet the need. The intent is to realize that it is possible to make a difference in the lives of those around you, no matter their background or needs.

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

There is no doubt that one of the biggest opportunities and threats to community broadcasters will be the roll out of digital radio.

There is much confusion in the Community Radio sector, of the impact of the recent statement in the DCITA media release "Framework_for_the_introduction_of_digital_radio".

This states "Jointly, wide-coverage community broadcasters in any market will have access rights to 128 kbps per analogue service (up to a maximum of 256 kbps per available multiplex) on the basis that they collectively determine how this is to be shared"

This appear somewhat ambiguous to most of the community broadcasters. Tied with this is much speculation on how the digital rollout will include community broadcasters, and at what expense, and what impact that any lack of funds at the time of the rollout may have on the long-term availability of that stream for that Community Broadcaster.

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

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

Many Community Broadcasters have made major financial commitments to broadcasting equipment, sites and infrastructure, and there is concern as to how digital radio multiplexing may work in reality. If it were to require extra equipment at a new site, with commercial costs associated with this, this may have a negative financial effect on the Community Broadcaster.

We would be concerned also if in the rollout of digital bandwidth, all community radio stations were expected to share stream bandwidth.

The most difficult and unprofitable outcome would be Community Broadcasters having to share channels with another station, whereby listeners may have Christian content playing in the morning, followed by ethnic broadcasting on the same channel in the afternoon.

From my perspective it is critical that the rollout of digital radio does not exclude or minimize the available channel bandwidth given to community radio.

Community radio should be granted at least the same availability to bandwidth as Commercial Radio if not more, so as to be able to better service their communities of interest in a more defined way.

As an example, in the case of 96five in Brisbane, the audience cumulative weekly listenership is of the order of 222,000 people per week (McNair Ingenuity Audience Research 2005), and if 96five were excluded or offered limited digital spectrum, my main concern would be that the station would no longer be able to adequately service our community of interest in this new and emerging, parallel and superceding medium.

A more positive outlook recognizes that digital enables a more flexible delivery medium. With this we may be able to provide more suitable programming to satisfy many of the different age groups in our community of interest we are unable to do adequately at present.

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

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

This does provide an exciting possibility and opportunity for the future.

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

I would suggest that there are a number of issues that are seen as threats to the viability of community radio in Australia.

Firstly, the ability to generate working finance is always on the top of the list. The restrictions imposed on community radio in the area of “sponsorship” make financial survival, difficult at best. The 5 minute rule for Community radio, while it is not the major issue in fundraising can minimize potential income for the station

Secondly, in the exercise of airing “sponsorship announcements”, the community broadcaster faces a minefield of issues relating to the lack of clear and decisive guidelines to determine what constitutes a “sponsorship announcement” and what constitutes an “advertisement”.

This lack of clear information, allows for the following:

- a. A rich source of “grey areas” that allow envious Commercial Radio entities to use as legal footholds for complaints against the community sector
- b. An inability or at least a strong fear of broadcasting information on events that are relevant to the community of interest, and sought by the community of interest, but these announcements may constitute an “advertisement” is aired.
- c. Fear that the ACMA is unable to clearly interpret legislation for the Community Broadcasting sector, who want to comply with the legislation, leaving them to feel that they are prone to attack by the Commercial Radio sector again

Commercial Radio entities appear to spend a large proportion of time looking for “breaches” of the act by Community Broadcasters.

Community Broadcasters often feel hamstrung by the often irrelevant and petty issues that constitute a “breach” of the act. The fact that an announcer reading a live sponsorship announcement, may leave out the word “sponsor” in the “tag”, and that, that could jeopardize the station license, is absolutely ridiculous.

I have a copy of the submission Peter James has made the inquiry regarding this very situation and I fully endorse his suggestions.

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His suggestions would not only reduce the onerous and “nit-picking” issues in regard sponsorship announcements for community radio, and allow us to get on and do the job properly, but also reduce the burden of complaint to the ACMA over trivial and inconsequential matters.

I make a point that Commercial Radio only targets those stations who are meeting the needs of the community and as a result are attracting listeners

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

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

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

We have been taken to task also for broadcasting a program, made by a “Not for Profit” organization, whose prime goal is to assist in life matters, those in a family situation, whose program is consistent with our listeners interest. As a Not for Profit they do not pay to air the program, but offer this as a service to Christian Community Radio and ultimately the community of interest. In the particular case, as a service, the provider offered copies of the program at cost price. We were advised that this constituted an “advertisement”, so we were unable to offer this service to our community of interest, who were and had been very keen to avail themselves of this offer.

We are currently constrained in our ability to communicate many events, of interest to our listeners, generated by Not for Profit organizations, even though their activities are in support of and of great value to our community of interest, as the announcement may constitute an “advertisement”

This constitutes a serious threat to the Community Broadcaster, given that while such issues are really quite petty in regard truly responsible broadcasting, they are a stumbling stone that may cause the broadcasters license to be revoked as a result of a breach, or repeated breach.

In regard opportunities, I believe that, in the case of those stations who are committed to providing quality programming for their community, they will see an increase in listenership, as listeners, in the majority, appear to want socially responsible broadcasting that encourages the community and seeks to give and serve the community.

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I also have a major concern for community broadcasters who have limited resources in regard training and programming skills and technical resources, as I believe the community generally, is tired of “back yard” community broadcasters.

The listening audience is very supportive of quality programming and professionally presented programs, and I have seen a demand for this, and negative feedback to the broadcaster if a reasonable standard in these areas is not maintained.

Community broadcasters willing to “step up to the plate” as it were and offer programming at a professional standard for their community of interest, will continue to grow in their listenership.

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