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Secretary:

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HOUSE OF REPRESENTATIVES
STANDING COMMITTEE ON
COMMUNICATIONS, TRANSPORT AND

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27th October, 2000

The Chairman
Standing Committee on Communications, Transport and the Arts
House of Representatives
Parliament House
Canberra, ACT, 2600

Re INQUIRY INTO ADEQUACY OF RADIO SERVICES IN NON
METROPOLITAN AUSTRALIA

Dear Chairman

This letter outlines the benefits that Radio for the Print Handicapped radio services would bring to regional and rural Australia.

It is also the RPH Australia contribution to the House of Representatives Standing Committee on Communications, Transport and the Arts inquiry into the adequacy of regional and rural radio services.

Australians would benefit from extensive regional and rural radio for print handicapped services by being able to access vital and timely information and topical readings in accessible formats. We consider both local and national news reading services to be essential for regionally based print handicapped Australians because they have no other readily available like service.

RPH Australia has an established Protocol which ensures that radio for print handicapped service licence holders work to reduce the information divide between Australians who have access to print and those who have not.

Australia's print handicapped population is significant and consists of people who, through age, disability or lack of literacy skills, are unable to physically handle books or newspapers or to read or comprehend printed material.

RPH Australia also services the networking needs of seven dedicated RPH metropolitan radio stations and aims to extend these services into regional Australia. This strategy has been successful in establishing four regional services including RPH stations in Mildura, Albury, Sheparton and more recently Bendigo. RPH Australia commends the work of the Vision Australia Foundation in helping to extend the reach of print handicapped services into regional Victoria.

Audiences in those regions have welcomed the introduction of radio for print handicapped services because the services include programs of local relevance such as community newspapers and local information produced by local residents. Regional audiences have also appreciated accessible programs of national relevance retransmitted from our various metropolitan RPH stations.

The efficiencies of this model have already manifested in Victoria with the use of a channel on the Optus B satellite and Internet news sources for the efficient distribution and production of programming.

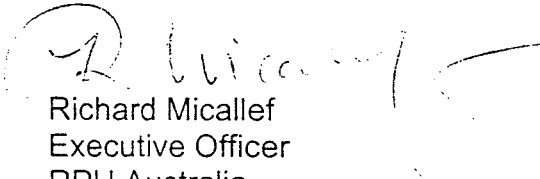
Building on this successful model throughout regional and rural Australia is a high priority for the Board of the Australian Council for Radio for the Print Handicapped and is being investigated by RPH Australia staff. Possibilities include the use of low powered retransmission of networked programs with local windows using narrowcast frequencies as well as the establishment of licenced stations as well as any emerging digital radio options.

RPH Australia has been able to co-ordinate the efforts of regionally based communities through the Vision Australia Foundation and other disability organisations. This has been an essential ingredient for our Victorian regional services and is being initiated in the Gold Coast where the Vision Australia Foundation is working with 4RPH to help establish a dedicated RPH service. Similarly in Perth, 6RPH is working with the State Department of Communications and the Association for the Blind of Western Australia personnel to extend radio services regionally into Western Australia.

We believe that our associations with community and disability organisations and local volunteers can lead to a sustainable, efficient and appropriate service for regionally based print handicapped Australians by providing social benefits as well as employment and technological outcomes in regional and even remote Australia.

RPH Australia would welcome the opportunity to be further involved in this Inquiry and to provide any additional information. A copy of the "Protocol for RPH Programming" is enclosed for your background information.

Yours sincerely



Richard Micallef
Executive Officer
RPH Australia.

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PROTOCOL FOR RPH BROADCASTING

INTRODUCTION

Radio for the Print Handicapped (RPH) aims to provide, through radio, a service that meets the particular needs of people who have a "Print Handicap". Its primary purpose is to reduce the information gap between those people who have access to print and those who do not.

RPH Services provide access to information and entertainment that is available to the general community in printed or visual form, but is not easily accessible by people with a print disability.

Australia's print handicapped population consists of people who, through age, disability or lack of literacy skills are unable to physically handle books or newspapers or to read or comprehend printed material.

RPH PROGRAMMING

RPH Services can be provided in two ways:

- * Through **dedicated RPH Stations**. There are currently seven licensed Community Stations, (one in each State Capital and one in Canberra) which are dedicated to meeting the needs of print handicapped listeners. Future, services may be licensed to serve regional and remote areas, as Community or Narrowcast Stations.
- * Through **blocks of RPH programming** broadcast on general community or other radio stations. These programs may be produced by the local station, an independent program producer or one of the dedicated RPH services.

RPH programming comprises:

- * readings of news and feature articles from daily and other general circulation newspapers;
- * subject based programs, that feature readings in an identified topic area, from newspapers, magazines, other publications and ephemeral reading material;
- * serialised book readings; and,
- * interviews, presentations and other features that relate to subjects that are of particular importance or interest to the print handicapped audience.

RPH IN THE WIDER COMMUNITY

Because of its unique role, RPH broadcasting enjoys substantial support from Government and the wider community. This takes the form of:

- * provision, by the Commonwealth, of spectrum, broadcasting licences and transmission facilities for the dedicated RPH services;
- * ongoing financial assistance from the Commonwealth, several State Governments and the general community;
- * Public Benevolent Institution Status and thus various taxation concessions for dedicated RPH Stations and the Australian Council for Radio for the Print Handicapped;
- * special arrangements for the administration of Copyright requirements, in relation to the broadcast of pre-published printed material by dedicated stations.

While, to date, this support has been directed, in the main, to the City based dedicated RPH Stations, it should be noted that the Commonwealth has indicated its desire that a reasonable share of its ongoing financial support be directed to the provision of RPH services that meet the information needs of people with a print disability who reside in non-metropolitan areas.

For its part, the Australian Council for Radio for the Print Handicapped has committed itself to the further development of the service through the following initiatives:

- * establishment of additional dedicated RPH Stations;
- * production and satellite distribution of national RPH programming that can be relayed through general community, narrowcast or other radio services;
- * stimulation of locally produced RPH programming for broadcast on community and other rural and remote area radio services;
- * extension of the current copyright arrangements to cover accredited RPH program makers and broadcasters;
- * restructuring of the Australian Council for Radio for the Print Handicapped, so as to better facilitate the involvement of local program makers and non-dedicated broadcasters in the national organisation.

At the same time, RPH Broadcasters must operate in an environment where they are subject to legislative and regulatory requirements and the influence of Government policy and community expectation.

- * The Broadcasting Services Act, 1992, provides the framework for licensing of the dedicated RPH Stations as "Community Broadcasters". The Act provides specifically for the participation of the Community of Interest (people with a print disability) in the planning, management and delivery of the service. Community Stations that include RPH material in their programming mix are also subject to these requirements.
- * While the Copyright Act, 1968, includes a provision which allows dedicated RPH stations to broadcast pre-published material without the specific advance agreement of the copyright owner, RPH Services are, none the less, subject to the broader requirements of the Act in relation to the integrity of the published material they broadcast, and acknowledgement of its source, publisher etc. This requirement may become more specific with the enactment shortly of Moral Rights Legislation, as foreshadowed by the Federal Government.
- * The Disability Discrimination Act, 1992, and various State and Territory anti-discrimination legislation, has particular relevance to RPH providers in relation to such things as the provision of information that might assist a person with a print disability to make full use of the service or to participate in its conduct.
- * Several of the dedicated RPH Services either receive direct funding support from their State's Disability Services Program or are part of a larger organisation that is in receipt of such funding. State Disability Services funding is subject to an agreement between the Commonwealth and States which includes a requirement that all funded services must comply with the Principles and Objectives that are appended to the Commonwealth's Disability Services Act 1986. As a result, these Stations must apply the DSA Principles and Objectives to their functioning. These Principles and Objectives articulate the rights that people with disabilities have in relation to their access to disability services.

Of the seven Principles (which are supported by fourteen Objectives) the following have particular relevance in the context of an RPH Service:

- (4) People with Disabilities have the same right as other members of Australian society to services which will support their attaining a reasonable quality of life.
- (5) People with Disabilities have the same right as other members of Australian society to participate in decisions which effect their lives.
- (7) People with disabilities have the same right of pursuit of any grievance in relation to services as other members of Australian society.

CRITERIA FOR RPH BROADCASTING

In light of the Government and community support that Radio for the Print Handicapped enjoys and the regulatory and policy influences under which the services are provided, it is essential that RPH program makers and broadcasters adhere to the following criteria:

- 1/ An RPH service shall complement other services by providing a broadcast service not available through any other electronic media, community group or organisation.
- 2/ The needs of those who are print handicapped shall provide the basis for all "RPH Programming". To this end RPH program makers and broadcasters shall engage in a process of ongoing consultation, in relation to programming, with the following groups:
 - print handicapped listeners to the service;
 - organisations of people with a print disability;
 - organisations that provide services to people with a print disability.
- 3/ While producers of "RPH Programming" will need to exercise choice in the selection of material for broadcast, RPH broadcasters shall ensure that selected newspaper articles and other published material are read in full, except where, in unforeseen circumstances, to do so would significantly disrupt the broadcaster's program schedule. All RPH material shall be presented with appropriate identification of the publication, edition, date of publication, page number and Author's name. In no circumstances shall the producer or any person associated with the broadcast vary the text or offer any editorial comment in association with a selected item.
- 4/ Recognised "RPH Programming" shall be provided in blocks of at least one hour, broadcast between 7.00 am and 11.00 pm and at least 90% of the designated time shall be comprised of defined RPH material. Material such as sponsorship announcements, music (except program themes) and other items that are not specific to the needs of people with a print disability shall not be included when calculating "RPH time".
- 5/ As an RPH service provider's responsibility is the provision of an otherwise unavailable broadcast service to what may be at times a small minority, "RPH Programming" shall at no time be compromised by the quest for sponsorship or a wider audience. While material should be presented in a style that will hold the interest of listeners, the broadcast of programs that are designed to entertain and do not address the information needs of people with a print disability shall not be considered as part of a Station's "RPH Programming".

- 6/ The Corporate structures of dedicated RPH Licencees shall ensure participation in the planning and delivery of the service by people with a print disability, as appropriate, having regard to the spirit of the Broadcasting Services Act to involve the Community Of Interest.
- 7/ RPH service providers shall ensure that where ever possible Committees relating to program review and initiation, and the monitoring of listener response to the service, have a majority of members who are persons chosen through organisations of people with a print disability.
- 8/ RPH program makers and broadcasters shall ensure that organisations of, or providing services to people with a print disability have adequate access to RPH program time. However, the licence holder shall retain the right to ensure that all material broadcast is in conformance with quality, legislative and legal requirements.
- 9/ Except as provided for below, RPH program makers and broadcasters shall commit themselves to the application of both the spirit and specific obligations expressed in the Community Broadcasting Codes of Practice.
- 10/ RPH program producers and broadcasters shall work to ensure their integration into the total service provision network for people with a print disability. Compliance with these criteria will serve as a demonstration of the bona fides of an RPH program maker or broadcaster for the purposes of funding, licensing and membership of the Australian Council for Radio for the Print Handicapped.

CODES OF PRACTICE

It is recognised that, in the main, RPH services will be provided through licensed Community Broadcasting Services. As such RPH broadcasters will be required to meet the requirements of the Community Broadcasting Codes of Practice.

It should be noted however, that because of its specific function "to provide spoken word access to pre-published printed material for people who are print handicapped", "RPH Programming" can not conform to some specific provisions of these Codes.

In particular, the attention of RPH program makers and broadcasters is drawn to the following provisions of the Community Broadcasting Codes of Practice. Variation from these provisions shall be limited to the extent detailed in this document.

1.8 "Present programs which contribute to expanding the variety of viewpoints broadcast in Australia and enhance the diversity of programming choices available to the general public."

RPH broadcasters should select material from a broad range of publications. They have an overriding responsibility to broadcast the variety of points of view that are reflected in the print media.

2.1 (C) "Community Broadcasters shall not broadcast material which may ... present as desirable the misuse of drugs, including alcohol, narcotics and tobacco".

An RPH broadcaster should not delete articles, editorial comment, or Letters to the Editor because they include such arguments. On the other hand, they should not distort the balance of opinion in the printed material or present such arguments as their own view.

2.3 "Community Broadcasting Licencees shall not broadcast material which may stereotype, incite, vilify, or perpetuate hatred against, or attempt to demean any person or group on the basis of ethnicity, nationality, race, gender, sexual preference, religion, age or physical or mental disability.

An RPH program maker or broadcaster should never broadcast any such material in its own name or that of its agent or servant. However, where such material is published in the print media it may well form part of legitimate "RPH Programming".

2.4 "News and Current Affairs programs (including News Flashes) should:

- (a) provide access to views under-represented by the mainstream media;
- (b) present factual material accurately and ensure that reasonable efforts are made to correct substantial errors of fact at the earliest possible opportunity;
- (c) clearly distinguish factual material from commentary and analysis;
- (d) not present news in such a way as to create public panic or unnecessary distress to listeners;
- (e) not misrepresent a viewpoint by giving misleading emphasis, editing out of context, or withholding relevant available facts;
- (f) respect each person's legitimate right to protection from unjustified use of material which is obtained without an individual's consent or other unwarranted and intrusive invasion of privacy;
- (g) not broadcast the words of an identifiable person unless:
 - (i) that person has been informed in advance that the words may be transmitted; or

- (ii) in the case of words that have been recorded without the knowledge of the person, the person has subsequently, but prior to the transmission, indicated consent to the transmission of the words;
- (iii) the manner of the recording has made it manifestly clear that the material may be broadcast."

Broadcasters must clearly distinguish between their Radio News and Current Affairs programs and the provision of "RPH Programming", as this Code must be applied in its entirety to all News and Current Affairs programming.

However, in so far as the reading of News and comment material which forms part of a broadcaster's identified "RPH Programming" is concerned, it should be understood that the Broadcaster's role in this context is as the conduit for news and opinion that has been published in the print media. As such, the broadcast of this material shall not be subject to the conditions set out in Code 2.4.

7.5 "Responses to written complaints will be in writing and will include a copy of the Code of Practice on handling complaints."

When applied to a dedicated RPH Service, or in relation to a complaint about "RPH Programming", this Code shall be read as:

"Responses to complaints lodged in a written form will be in a format appropriate to the needs of the complainant (large print, braille, audio or on computer disk) and will include a copy of the Code of Practice on handling complaints and this Protocol for RPH Broadcasting.

Adopted by
Australian Council for Radio
for the Print Handicapped
27 August 1995