



# Sydney's Radio Reading Service

Radio for the Print Handicapped of NSW Co-operative Ltd

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

### Inquiry into Community Broadcasting

**Submission by:**

**Radio for the Print Handicapped  
of NSW Co-operative Ltd (2RPH)**

**March 2006**

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• Hon Justice Kim Santow, OAM • Lucy Turnbull • Dr Sue-Anne Wallace • Joan Warner*

## Executive Summary

2RPH owns and operates the print handicapped radio station in Sydney known as 2RPH. We are an AM broadcasting station with coverage of most, but not all, of Sydney. We are an independent member of the RPH (Radio Print Handicapped) group of stations.

The term print handicapped applies broadly to people who can't see, hold or understand the printed word. This primarily includes people who are vision impaired, or arthritic, or quadriplegic, or illiterate or whose first language is not English.

All RPH stations hold a ***print disability radio licence*** under S.47A(11)(b) of the Copyright Act. This enables us to broadcast readings from newspapers, magazines, books etc without infringing the copyright in those works. This is a unique feature of our broadcasts, without which we would not be able to fulfill our role in communicating a wide variety of content to our print handicapped audience.

Matters raised by us in this submission are summarised as follows:

1. *Funding for Increased Coverage* 2RPH is well advanced in planning to extend our coverage to greater Newcastle and Wollongong, and to improve our coverage in eastern Sydney. In all cases this is to be done by installing FM relay transmitters. Newcastle is on track to be commissioned later this year with the other two to follow. While we have had some success in raising funds from private sources to meet the one-off costs, it is generally more difficult to raise funding to meet the recurrent annual operating costs.

2RPH and the other RPH stations fulfill a vital need in our community. We believe that additional funding should be provided to the RPH stations by the Federal Government to enable extension of the RPH capital city services progressively to major regional areas by the provision of FM retransmission services.

We recommend that the Committee's findings support additional funding to extend RPH services through FM retransmission services and that this funding comprise a balanced mixture of one-off and recurrent funds.

2. *Future use of the Internet* Provision of access to 2RPH programming via the internet is an important medium term objective for 2RPH. 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. Unfortunately this is virtually impossible for us to do at present as the copyright exemption we enjoy for our radio broadcasts does not extend to carriage of our broadcasts over the internet. We believe there are viable solutions to this dilemma, which are further developed in this submission. We consider it appropriate for the Committee to study this matter further and consider making appropriate recommendations.
3. *Increased Awareness of 2RPH* We are concerned that many persons in our target audience are not aware of our service. A means of minimising this would be to provide funding to increase community awareness through the development of regular publicity campaigns and targeted literature to organisations that come into contact with people who are part of our target audience.
4. *Opportunities and Threats* Regarding opportunities and threats, the main opportunity for 2RPH is to extend our existing service to a wider audience through a combination of FM retransmission services and internet streaming. The main threats to our service are reductions in our funding, major disasters (force majeure) and a future shortage of skilled staff, both volunteer and station management.

## **Background to 2RPH**

2RPH - *Radio for the Print Handicapped of NSW Co-operative Ltd*, owns and operates the print handicapped radio station in Sydney known as 2RPH. Our studios are at Glebe with our transmitter at Prospect, a Sydney suburb. 2RPH can be heard on a frequency of 1224 on the AM dial. We broadcast to print handicapped Sydneysiders 24 hours a day. We read from newspapers, magazines and like material from 6am to 11pm and cross to a relay of BBC World Service overnight from 11pm to 6am.

We are a legal entity in our own right while at the same time being a member of the RPH Australia (RPHA) group. RPHA 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. 2RPH plays an active role in a number of these projects.

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.

The Market Equity Secondary Research commissioned and adopted by RPHA in 2002 determined that (conservatively) 17.39% of the Australian population has a print disability. The report, using grossed up 1996 census statistics, put the Sydney print disabled number at 696,619. Assuming the same percentage still applied, the print disabled population figure for Sydney in 2006 would now be rather higher than this 2002 based figure.

Geographic coverage of our 2RPH transmitter is generally comparable to Sydney's commercial radio stations except for some areas in the eastern and north-eastern suburbs where reception is generally poor.

Our primary sources of funding are:

- DCITA for our Sydney transmitter costs
- NSW Department of Ageing, Disability and Home Care for most operating costs
- Community Broadcasting Foundation (CBF) provides an annual programming support grant and meets some electricity and program line costs
- Sponsorship
- Donations, bequests and fund raising activities.

We are well advanced in planning to extend our coverage to greater Newcastle and Wollongong, and to improve coverage in eastern Sydney. In all cases this will be done by installing FM relay transmitters. Newcastle is on track to be commissioned later this year with the other two to follow. Funding to establish these services is being sourced from private sources.

Further information about 2RPH is included in an Attachment to this submission.

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

### *(a) Present Scope & Role*

2RPH and its companion stations in the other states of Australia fill a unique place in the landscape of radio broadcasting across Australia. Broadcasts by each of the RPH stations are not duplicated to any extent by other national, commercial, community or narrowcast radio stations.

Each RPH station provides a mixture of local and shared (network) programming. For example, at 2RPH in Sydney we read the Sydney Morning Herald while at 3RPH in Melbourne they read the Age, and similarly in the other States. Each RPH station operates independently to meet local needs while sharing some common content (programming) between them. Apart from our regular daily broadcasts from the BBC, about 95% of our content is locally produced, with 5% from other stations in the RPH network. Examples of networked material include the reading of articles from national magazines and serialised book readings which are produced by one of the RPH stations, then made available to all stations for replay in accordance with their individual schedules.

The RPH stations share material primarily through distribution over the internet and by satellite. In most cases this is for recording and replay at a later time. 2RPH is a major contributor to the RPH Digital Program Exchange project, utilising the internet as the means of distribution.

The RPH stations are uniquely positioned to provide these services as they each hold a *print disability radio licence* under S.47A(11)(b) of the Copyright Act. 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 ...*" [S.47A(1)]. This simplifies much of our operations by reducing what would otherwise be a huge overhead to clear copyright.

### *(b) Internet Streaming*

The above right under the Copyright Act does not exempt us from copyright obligations should we wish to make our service available on the internet as a streaming audio service, or if we wished to provide audio content via a telephone service.

Chapter 10 of the Attorney-General's report "*Copyright Law Review Committee - Simplification of the Copyright Act 1968, September 1998*" raised several issues regarding copying for people with disabilities, with Section 10.08 commenting on other forms of transmission as follows:

*"10.08 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 print disability. In this situation, the Committee considers that the 'sole purpose' test should also apply to such transmissions"*

While this report raised the issue of delivery of RPH services over the internet, no action was taken at that time. A key issue, that 2RPH wishes to raise, is what kind of arrangement would enable 2RPH to carry its entire programming via an internet streaming service. We believe it is timely to raise this matter now, that it is rightly a matter for the Parliament and that it is within the terms of reference of this Inquiry.

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.

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. This may have been a serious concern some years ago but there are now technologies available known as geo-blocking systems which can block around 99% of access from chosen geographic areas. These can be used to detect where in the world an internet user is physically based and block access by that user. These systems are affordably priced.

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.

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 we could be severely restricted in the range of programming we might deliver in this way.

We would welcome the opportunity to further develop this matter should the Standing Committee consider it a subject of interest and relevance to this inquiry.

(c) *Service Extensions & Funding*

The Technological Opportunities section of this submission outlines 2RPH's progress towards extending our service to people in greater Newcastle and Wollongong as well as improving our coverage of Sydney's eastern suburbs. These major projects are well advanced.

The level of funding provided to the RPH stations is vitally important in seeking to extend our services to more Australians and to improve the quality of our service. As noted earlier in this submission, some 17.39% of the population is in the print handicapped category. In general terms the RPH sector is underfunded when compared with other sub-sectors within the Community Broadcasting sector. Priorities for service extensions and additional funding are sought by 2RPH to:

1. Enable extension of the RPH capital city services progressively to major regional areas by the provision of FM retransmission services fed by a satellite distribution service.
2. Provide the RPH stations with a higher profile and increased community awareness through the provision of funding for regular publicity campaigns and targeted literature to organisations that come into contact with people who are part of our target audience.
3. Develop digital delivery services, especially for audio streaming over the internet. Preferably this would be by a continuous relay of 2RPH's programming, but could also be supplemented by selective 'on demand' replay of items that had been recently broadcast.

## **Content and programming requirements that reflect the character of Australia and its cultural diversity**

2RPH's programming is always in the English language. Our programming comprises readings from national, state and suburban newspapers, supplemented by a wide variety of magazines, feature stories, book readings, some music and other special programming produced by us which is of interest to our audience. In doing so we endeavour to cover a wide range of content which, in total, generally reflects the Australian character and cultural diversity.

RPH Australia members are also signatories to the "*Protocol for RPH Broadcasting*", a policy document which provides a set of guidelines to ensure that RPH services provided by each of the RPH stations meet the needs of people with a "*Print Disability*". The Protocol covers programming standards, programming content/criteria and standards in general. The Protocol is reviewed by RPH Australia periodically.

2RPH (and all RPH stations) must also comply with the Community Broadcasting Codes of Practice.

## **Technological opportunities, including digital, to expand community broadcasting networks**

### *(a) Service Extensions*

2RPH is well advanced with a project to extend its present programming to greater Newcastle and Wollongong areas and to improve its coverage in Sydney's eastern suburbs. All three projects involve the provision of FM transmitters to serve these areas and a program distribution network to deliver our programming to each of the transmitter sites.

This is an expensive project as medium power transmitters and broadcast antennas with a high elevation are essential to achieve wide coverage. Planning is well advanced. The ACMA is close to allocating licences (frequencies) for the transmitters and final quotes have been obtained to build and operate these services. About 1/3 of the establishment costs have already been raised from private sources. We believe we can raise the balance of the establishment costs but expect to find it much more difficult to obtain the annual recurrent operating costs on a year by year basis. The ongoing costs are generally much more onerous over time and there is a risk that failure to meet the recurrent operating costs could lead to a new service closing.

If a cost sharing arrangement between 2RPH and Government were to be put in place we believe the most cost-effective and sustainable outcome would be for much of the establishment cost to be funded by us, with the Federal Government meeting most of the recurrent operating costs. This would also generally match the arrangement that now applies to our main 2RPH transmitter in Sydney.

The establishment of retransmission services is by far the most cost-effective way of reaching new audiences. Our audience is a print handicapped audience and while technologies such as internet streaming have an important part to play, the ability to receive our service by simply turning on a radio receiver is invaluable. Our service is for people with a print disability and radio is the simplest and most effective means of delivering it to them. Radio has no cost, equipment or technical know-how barrier to our audience.

### *(b) Internet Streaming*

As noted earlier in this submission we see a place for internet streaming in our future and we have looked at it briefly. While we don't have the discretionary funds at this time to establish a streaming service we do note that it would be difficult to establish a full streaming service without some changes to the copyright arrangements applicable to Radio for the Print Handicapped.

This is not a simple issue to resolve although some form of restricted internet streaming to registered (authorised) users has possibilities. Another option is to have 'on demand' non-live streaming access to selected material being available for a few days after broadcast. We are interested in these options but other developments within our studios and extending our service to greater Newcastle, Wollongong and East Sydney are priorities for us at this time.

Access to our service via the internet is an area where a study by a suitably qualified and experienced expert might find a common workable streaming solution that could be used by all stations in the RPH network. Clearly any such study would need to address the copyright issues.

### *(c) Digital Transmission*

Currently there are a number of digital terrestrial radio transmission technologies in various stages of development throughout the world. The two most developed at this time appear to be Digital Radio Mondial (DRM) and Digital Radio Broadcasting (DRB). In both cases 2RPH would be pleased to participate in any Australian trials provided there were no significant additional costs to us. In the longer term, as or when these services might be introduced, it is important for our broadcasts to be both available and accessible to our audience on the new technology.

We do note that some quite significant accessibility challenges are presented by many digital radio receivers, particularly for people who are blind or vision impaired. Largely, these problems stem from the heavy reliance on visual displays on modern digital radio receivers and complex button arrangements for making selections. It may be that 2RPH could play an important role in examining this issue of accessibility as part of a digital radio trial in Australia.

DRM is a particular candidate for trials on 2RPH. We have a high power AM transmitter in Sydney while all the other AM transmitters carry either national or commercial broadcasts. Because of this our station might be a good candidate for any trials as long as they did not cause interference to or loss of our primary AM radio service.



## **Opportunities and threats to achieving a diverse and robust network of community broadcasters**

2RPH currently has a strong and robust service. Our service has been built up over more than 20 years, meets the audience needs and is financially, operationally and technically stable at this time.

The main opportunities for us relate to our ability to make our service available to a wider audience. As noted earlier in this submission we are well advanced in developing the extension of our service to greater Newcastle and Wollongong and improving our coverage of Sydney's eastern suburbs and some of the north-eastern suburbs. We see this as our most valuable and important opportunity over the next year or two as it will bring our service to about 1 million more Australians when fully operational.

A future opportunity for the Newcastle and Wollongong services is to include some local content in these services rather than simply relaying the Sydney-based 2RPH service. The first local content need would be readings from their local newspapers. However, this will come at added cost as we would need to establish a mini studio presence in Newcastle together with the technical facilities and circuits to enable the local content to interrupt our 'network' feed from Sydney.

The development of internet streaming is also an opportunity we look forward to, but as noted earlier there are issues concerning copyright which make it difficult to provide a comprehensive streaming service at this time. The cost of this still needs to be looked at in detail, especially in regard to the number of simultaneous streaming channels we could afford to provide. At present we feel this is more a matter for future study by us, rather than being an urgent priority.

The threats to 2RPH are primarily in three areas: funding, force majeure (major disaster) and staffing. Of these, funding is the most serious. We are heavily dependant upon grants from Federal and State Governments to meet most of our day to day operating costs. Should these be suspended or significantly cut we would risk being unable to continue broadcasting.

Force majeure is always a serious risk. A major disaster such as our studios being burnt down could be managed in the short term by relaying the Victorian RPH program, but it could take several weeks or more to find suitable studio premises and re-establish an approximation of our normal programming. A disaster at our main 2RPH transmitter site at Prospect would be unlikely to result in an extended outage. It should take only a few days before we would be able to resume an interim service. Such an interim service might operate at lower power and continue for a relatively long period depending upon the speed with which our full service could be re-established.

Staffing is an issue because of our absolute dependence on a pool of about 250 volunteers to sustain our on-air programming. These are the operators and readers of our on-air programming. We also use a very small group of specialist volunteers to train our staff. These trainers frequently work at our studio on an almost full-time basis to train new volunteers and monitor/improve the quality of our on-air presentation on a daily basis.

We are also particularly dependent upon our station manager who is our only full-time paid employee. Should he decide to leave, or suddenly be unable to continue in his position, we would face a difficult time recruiting a replacement person of the same calibre, at a salary we could afford. In these circumstances there could be a period of somewhat erratic performance by our station, possibly lasting for some months.

## ATTACHMENT

### ABOUT 2RPH

The need for a free radio station in Sydney to serve blind citizens was first seriously contemplated in 1977. By July 1979 the *Radio for the Print Handicapped of NSW Co-operative Ltd* had been formed and test transmissions undertaken. In 1981, the *International Year of the Disabled Persons*, the Federal Government established a grant that would enable 2RPH to purchase a transmitter. By 1983 the station had a licence to transmit, a transmitter, studios, and a group of volunteer staff. Regular broadcasting had started for this new and innovative service.

The station has since grown to where we broadcast 24 hours each day, have permanent studios at Glebe and a high-power AM radio transmitter with coverage broadly comparable to the Sydney commercial stations. We have a full-time paid station manager together with about 250 volunteer readers and announcers who present our programs. Our studios are in operation from 6am to 11pm each day, with programs from the BBC being broadcast from 11pm to 6am.

Since quite early in its history, the target audience for 2RPH has grown from meeting the needs of people who are blind, to the broader category of persons who are print handicapped.

Loss of sight is a condition that goes hand-in-hand with age. In other words, most of the blind people who live in Sydney have lost their sight after they reached the age of 60. By reading newspapers and magazines over the air, we are enriching the lives of not only elderly people with a print handicap, but all people with a print handicap within our listening area, and they can access this information simply by switching on their radio.

This is an innovative and effective method of delivering this unique and much needed service to a disabled section of our society.

Our studios at Glebe are centrally located in Sydney and comprise three on-air studios, an edit booth, master control room, a program preparation area and space for managing the station, etc. We are now in the middle of conversion to computer based recording and presentation. The main advantage of this is the ability to replay pre-recorded material in accordance with a schedule especially in the evenings. When finished this will give us a more productive environment with little need for late night shifts by volunteer staff.

Governance is by a Board of Directors operating under rules established by the Registry of Co-operatives in NSW. 2RPH is registered under the Charitable Fundraising Act and is also registered with the Australian Taxation Office as a Deductible Gift Recipient.