

Dear Secretary, and members of the Committee,

This submission to the Community Broadcasting Inquiry is being made by myself, drawing on my experiences and observances of the community broadcasting sector, in the hope that it may assist the Committee in its present tasks. I commence by outline some of my experiences, in order to further your awareness of the scope and role of community broadcasting in Australia, and then move on to present some ideas for consideration regarding improving provision of community broadcasting services in regional areas of Australia (both radio and television), and conclude by raising a concern I have regarding a possible interpretation of some of the license conditions prescribed by the Act that appear to be too limiting.

I have been involved with community radio stations since 1994. I began as a high school student participating in my high school's weekly 1-hour program on the local community radio station. One of the teachers at the school was a member at the station, broadcasting to the north-eastern edges of Melbourne, the rural-urban fringe. This program provided an opportunity for a group of interested students to learn about producing radio programs, recording interviews, and learning technical skills such as the use of equipment. It was viewed as an extra-curricula activity of the school, and the school provided facilities for us to use in preparing the program content. However, it interested me enough that as I was nearing the completion of Year 12, I decided to complete the station's formal training program to become a presenter in my own right.

This led to a period of 5 years of involvement in that station, in both on air and support roles. One of the off-air roles I performed was to coordinate the running of a music scholarship for local musicians that was supported by the station, named "Performers of Note." Offered each year for 3 years to VCE music students at all secondary schools in the broadcast area, this scholarship involved the students performing to a panel of adjudicators, who would give valuable feedback to the students in their preparations for their performance exam; several were selected as finalists to perform in a public concert organised and promoted by the station, with a winner being selected to receive the "Performers of Note" Scholarship. The radio station's role in this was to be able to record all performances (both auditions and the concert), and provide these to each student on CD, so that they could both hear themselves (to consider the adjudicators' comments) and to be able to share with family and friends. The concerts were broadcast on the station's classical music program.

The classical music program also featured recordings of other concerts, including organ and other recitals recorded at one local Church which was a member of the station. On one occasion, an organist from the USA was able to be broadcast live from the Church, preceded by an interview. Monash University's School of Music Conservatorium also kindly allowed me to record for broadcast some of its evening concerts, in return for them receiving a copy of the recording for their archives. In many cases the performers were students from the university, who would not normally have the opportunity to be heard beyond the performance hall. (I was a student at Monash at the time.) Whilst my siblings were still at high school, I was also able to record the school's concert bands and choirs, again for broadcasting on the station.

The station had some other programs which enabled musicians and bands of other genres to perform their pieces, often before other radio stations were even to consider playing those artists.

Another station which I was involved with for a period had a program which dedicated 3 hours per week to playing music by unsigned Melbourne-based artists. Most of these artists were

people who produced the music in their own home, without the support of large record companies. Incidentally, I believe, as a result of sending in their tracks (they were modern-style pieces) and having them aired, several artists were offered some contracts by label managers who were listening. That program certainly helped to get those musicians off to a good start in their music careers, as well as add local content to the airwaves. The station itself had proposed to release a CD of the most popular of these (determined by listeners), however, several issues prevented it from doing so – the main one being timing – (the station was an aspirant one which was only on air for short periods of time, and this project was proposed just prior to a decision on licence allocations was made, meaning the CD was not going to be able to be promoted on air as the station was not granted a full-time license).

The stations with which I have been involved with have been at a range of types of premises. One was originally occupying some old wooden school portables, however, when the school decided it needed more carparking, and wanted to demolish those portables, the station was required to seek new accommodation – and moved into a facility that was formerly used as a maternal daycare centre. Another station was renting space at the Global Television Studios complex in Nunawading, Victoria. Monash University's student-run station was using two small rooms, one which was for administration purposes.

I am not aware of many community stations which own their own facility. Therefore, one uncertainty for stations is whether they will be able to maintain their lease arrangements. Most stations do not make sufficient operating profits to consider investing in acquiring their own premises.

I would like to make an observation of the differences I have observed in the media landscape between City regions, and rural regions. Several years ago, because of my employment, I moved to the Gippsland area situated 2 hours from Melbourne. Having grown up in Melbourne, I had little appreciation of how my regional counterparts felt with regard to what services their media were providing. In Melbourne I had access to a wide array of media sources, as the radio dial offers many stations to choose from. One striking difference noticed in the regional area was that there were less choices available. According to the Warragul LAP, for reception in my particular region, there are 7 FM services, and 3 AM services (of which one is a simulcast on both bands).

One thing I have noticed is that regional areas have a clear sense of local identity, I have gained a sense that I am almost in another state, rather than Victoria – the distance from Melbourne, and the fact that there are several large towns in this region (Moe, Morwell, Traralgon, Sale), who share common day-to-day issues, the higher likelihood of 'knowing' people you see in supermarkets etc., and a rather comprehensive local newspaper all contribute towards generating and preserving this sense of 'local importance'. However, much of the programs on the commercial, and even national broadcasters in the area, tends to be sourced from outside the region. In particular, much ABC programming seems to come from Melbourne, or else is focused on national-level sporting broadcasts. Commercial music stations seem to have large amounts of programs coming from regions elsewhere in Victoria or interstate and thus lose the sense of local identity. There is only 1 community station with a broad-range of programming, and another one which is more narrowly focused in its programming (and which I believe is all pre-recorded, due to financial constraints at this stage – it has had its licence for only a few years). Additionally, most news related programs on television are the bulletins produced in Melbourne, and are thus Melbourne-centric, apart from WinTV's special half-hour bulletin, although that is produced in Bendigo or Ballarat and some the items do not pertain directly to the Gippsland

region. I note that there are license conditions on the regional TV broadcasters to include some local-news, but this is often no more than 2 minutes worth of content per day which is not sufficient to adequately meet the needs of such a large region of Victoria.

I feel that it would be worthwhile to consider allowing additional community radio stations in regional areas, servicing both small districts (e.g. 10-40km radius) and larger districts (e.g. above 40km), in order to provide further diversity and greater local content in radio services to regional communities.

One thing that is missing from the region (and I suppose from other regions around Australia), is a truly locally focused TV station. This is where I feel that a community television station could be beneficial. Just as the community TV stations that now operate in many of the capital cities provide an outlet for locally produced television programs and innovative content, I see that the role of community television could be even greater in regional areas, where it can help to address the local needs that are largely not being met by the other television broadcasters. For example, local sports broadcasts, local events, locally produced other programs.

However, there are several things which impede this. The main problem is that with the release by the ABA of the License Area Plan for Regional Victoria Analogue Television in October 2003, the Ministerial Reservations for future services for a great many community television stations in regional areas were all deleted from the schedule (see pages 251-258). I believe this was done in order to facilitate the conversion of television services to digital. Most of these services were proposed for small geographical areas. However, in the earlier released Digital Channel Plans for Regional Victoria (December 2001), and the subsequently released additional Digital Channel Plans to service the smaller regions (July 2004), there is no provision for any community television broadcasting services. Whilst I concede that having reservations for 82 community television services in regional Victoria was very high and probably more than necessary, I would suggest that perhaps 10 or so high-powered community television services spread across Victoria (e.g. co-located with the commercial and national broadcasters' main towers) could be of benefit to the regional communities – and would place less strain on ACMA in trying to find spectrum to designate for the purpose. These comments apply to other states and territories of Australia too.

As I'm sure other submission have probably pointed out, the existing licensed community television broadcasters in capital cities would hope that they can be accommodated in the digital television channel plans, although it seems that they had initially been overlooked by the release of only 'commercial' and 'national' digital channel plans.

Since community television is a relative newcomer to the scene, I do not feel that its full potential has yet been realised, and this may explain why there have not been many proposals from regional areas to establish such a service. Another factor, which the ABA had acknowledged is that the cost of establishing a television service is in the order of \$400,000, and so they indicated that they would not consider any proposals for such services unless this amount of money was raised by the companies proposing to provide any future community television broadcasting services.

To summarise this aspect: I recommend that consideration be given to plan for the future provision of community television services, on digital television channels, in all the key regions of Australia, in addition to the capital cities.

My final concern regards one of the license conditions that applies to all community broadcasters, and how that condition appears to be interpreted by the ACMA (and previously ABA), which could act to limit the scope of matter we can broadcast. I refer to clauses 9 (1) (b) and 9 (5) of Schedule 2 of the Broadcasting Services Act, which says services broadcasting under a community license may not broadcast advertisements, and to various reports issued by ACMA and ABA after investigation of claims that various stations had breached this condition.

Specifically, the scenario is the one in which a program presenter wishes to present a 'gig-guide', i.e. an enumeration of bands, or DJs, or concerts, or other public performances which may be of interest to listeners. For example, the following may be a typical script of the 'gig-guide':

The XYZ band is playing at the Town Hotel this Friday night. Entry is \$15.

The Soul Sisters are singing at the Performing Arts Centre on Wednesday morning.

DJ ABC is going to be appearing at Jim's Bar next weekend. Pre-sale tickets are \$10, or \$15 on the night.

The African Drumming Group are performing at the Warragul Arts Centre on Monday, and the Sale Entertainment Centre on Tuesday, and tickets are \$10 for both locations.

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, albeit often only a few hundred dollars or less, and want to 'promote' their gig so that more people will attend – but they have not 'sponsored' the station. As a consequence of the breach rulings made in relation to other stations, I personally have refrained from broadcasting any form of gig-guides when I am on air.

However, because community radio's diverse programming often means that it has programming that covers styles of music which are not generally heard on commercial stations, we are the best positioned to let the listeners know about where they can find performers of those styles of music/theatre/arts events, even though the events require a charge. 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.

Therefore, I would recommend that it be clarified whether or not a gig-guide such as the example given above can be construed as advertising, and if so, I ask 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.

Thankyou for considering my submission,

Shane Moore
16-3-06.