

Southern Community Media Association

As a result of events in the past few weeks the membership of the Southern Community Media Association has requested that we contact you to express concern at the way that the ACMA re licensing process is being conducted for community broadcasters.

The SCMA represents 25 member community broadcasters throughout southern N.S.W and Victoria

The membership of our association is deeply concerned at recent developments not only with the failure of 3 CCC FM Bendigo to maintain its community Broadcasters license but also with the problems that have effected other member stations due to the open interpretation of the renewal process and the ACMA's failure to give a clear interpretation of what is required.

Firstly we would like to address the process of license renewal and believe that any formal notifications should be via registered mail. (this should include any final warning)

Secondly we find that it is completely against corporate governance to advise a Broadcaster by fax (quite often a station is manned by volunteers or even unmanned) such notification should always be of a personal and confidential manner to the appointed representative of that station.

Community Broadcasters are community based businesses and as such enter into legally binding contractual arrangements with sponsors and other organisation. We find that it is completely unacceptable that at the same time as advising the broadcaster of the ACMA's determination not to renew a license that they will also issue a general press release to the media meaning that the station in question has no grace period to personally contact supporter, sponsors, broadcasters and station members of that determination. We believe that there should be a set period between notification to a Broadcaster and a general media release set to allow Broadcasters the dignity that they deserve to inform all concerned of the ACMA determination.

There are also real concerns at the general appearance of a lack of assistance to Community Broadcasters to maintain their broadcast license. It must be remembered that the Community Broadcasting sector is volunteer driven and not always in the best position to deal with the necessary paperwork on the spur of the moment or the sometimes unreasonable time lines set by the ACMA. We believe that the form ACMA 66 is extremely time consuming and bordering on specialist requirements to be completed effectively first time round.

There is no question of the Southern Community Media Associations and its members support of the need for a re-licensing process however we believe that the overwhelming majority of Community Broadcasters responds to their local area of interest and this should be the foremost determination of a broadcasters ability to maintain and hold a community broadcasters license.

An examination of the ACMA website and request for additional information's on renewal applications raises a number of concerns. Firstly it is stated that the average membership of a regional station is 185 members. We have determined from our own research that this figures appears to be extremely inflated with the majority of Broadcasters having membership numbers well

below this figure. A low membership isn't necessarily an indication of no support for the broadcasters or their on air presence. Support for a broadcaster can be demonstrated by any number of additional factors such as Business support through sponsorship, support of local government and community leaders and community organisation. It is very apparent that within the community broadcast sector there is a wide array of support determinations that have not been addressed within the ACMA 66 or given due consideration by the ACMA in making their determinations.

The suggestion that the Talk time within Community Radio is currently interpreted at 42 hours per week is also cause for major concern within the sector. Some of our members including 3 CCC Bendigo broadcast in excess of 18 hours per week of local sport during the winter months and still cannot reach the magical proposed figure of 42 hours. Please keep in mind that the total on air time of community broadcasters is 168 hours per week and that 42 hours of talk time represents 25% of the total on air time and an unrealistic requirement by stations largely run by a volunteer workforce with limited recourses.

A community broadcaster by its nature must respond to the demands of its local area of interest and surveys indicate that listener requirements have a priority for Good music mixed with local news and information. There is little to be achieved by talking for talking sake. The bottom line is that there is little use broadcasting local events if the majority of listeners are not tuned in. It is our belief that as demonstrated by the McNair Ingenuity surveys Community Broadcasters are for filling a major roll in the distribution of information and entertainment to literally millions of Australians.

We are more than happy to meet with the committee to discuss and clarify the points as laid out in this document. There is a real concern that if these problems are not addressed quickly and efficiently that there will be long term detrimental effects not only at a broadcaster level but to the sector as a whole.

Kindest Regards

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