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The Secretary
Senate Environment, Communications, Information Technology and
the Arts Committee
PO Box 6100
Parliament House
Canberra ACT 2600

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Re: Inquiry into the provisions of the Broadcasting Legislation Amendment (Digital Radio) Bill 2007 and the Radio Licence Fees Amendment Bill 2007

I am writing on behalf of Triple R Broadcasters (3RRR), a community broadcasting station in Melbourne that commenced broadcasting in 1976 as 3RMT under an experimental license and was granted an educational license in 1978 as 3RRR.

Triple R's mission statement is:

To educate, inform and entertain by drawing upon appropriate community resources; to develop a critical approach to contemporary culture.

Triple R Broadcasters Ltd is a company limited by guarantee operated by a Board consisting of members of RMIT, The University of Melbourne and representatives of the station.

Triple R presents a broad and diverse block format of music and talks programs and broadcasts live 24 hours a day to the Melbourne metropolitan area. The station operates with over 150 volunteers, a small core staff, and the support of over 11,000 subscribers to the service.

Triple R is committed to developing online and digital services and has been audio streaming from its website since 2000, and also provides archive program material and talks podcasts from the site.

In 2004 the station purchased new premises which has extended studio facilities, a designated multi-media training room and a live public performance space due for completion in mid 2007.

Digital broadcasting represents a considerable challenge to community broadcasting services in terms of the resources required to facilitate both program content and transmission infrastructure however 3RRR is keen to participate in a digital environment.

Triple R's primary concern with the Digital Radio Bill 2007 is the framework it proposes for the management of access to multiplex capacity for community broadcasters and the digital licensing structure for existing analog community services.

The proposed 'digital representative company' in capital cities represents a restrictive and onerous structure to community broadcasters that places unnecessary additional management requirements and costs on the community broadcasting sector. It also restricts developing more creative solutions to content collaboration, management and delivery that require a more flexible framework to develop over time in a digital environment.

The nature of licensing for analog community broadcasting services has been to provide alternative and complimentary services in specific markets that serve specific communities of interest. Given limited spectrum capacity the ACMA (and previously ABA and ABT) have given careful consideration to licence application processes to ensure that in a specific market area, and especially in capital city markets where a higher number of community services exist in the same market place, a broad range of communities are serviced. This means that analog services often share commonality of content, resources and networks across capital city markets rather than within.

For example 3RRR would have content in common with other educational services such as Radio Adelaide (5UV) and 2SER in Sydney as well with newer community youth services such as SYN in Melbourne and Edge in Hobart. In addition, its long-term commitment to local content and Australian music also creates commonality with stations such as 6RTR in Perth and 4ZZZ in Brisbane. In other areas of the sector the MBS classical music stations exist in 4 state capitals, there are indigenous stations now operating in all the mainland capital cities, as well as RPH services, Christian broadcasting and ethnic & multicultural services in all capital cities.

It's important that the framework proposed in the legislation allows appropriate collaboration that facilitates these existing commonalities in content which would reinforce the development of innovative new digital content utilising existing networks in a cost effective manner.

The management framework currently proposed in the legislation not only inhibits this process but adds an onerous, unnecessary and costly management layer for community broadcasters to an already complex digital transmission framework.

In addition, individual community stations require some surety of digital licensing and allocation in order to proceed with collaborative and innovative digital content development. Each individual station has its own structures, networks and engagement with their community of interest and it is important that these identities are preserved and supported in a digital environment.

Each station requires the flexibility to pool resources that strengthen that identity and retain relationships with their communities which is an inherent part of creating content that is both relevant to and reflective of those communities.

To do this stations require an allocation of digital capacity that is licence specific so that they can continue to have a level of ownership and control over their broadcast services in both an analog and digital framework.

Given the limited digital capacity available, especially in markets such as Melbourne, it is understood that the initial digital licence allocation to existing metro wide community stations may not be able to be at a full 1/9th of a multiplex level. However, 3RRR considers it essential that there be at least a fraction of that capacity allocated in the early stages providing the station with choices as to how it might collaborate with other community services and also creating the framework to eventually reach parity with commercial services at the full 1/9th capacity.

Triple R's listeners have been extremely loyal and supportive to the service over the last 30 years, and have an expectation that the nature and approach to content that the service takes will have a digital future. This is not reflected in the Bill's digital representative structure or the lack of surety provided in the digital licensing structure proposed.

The time frame for submissions on the legislation was rather short for the largely voluntary nature of the community broadcasting sector but I believe many stations operating different types of services and serving quite different communities of interest would share these concerns with 3RRR.

Amendments are required to the Bill, and possibly further consultation with the community broadcasting sector or its representative bodies, if digital legislation is to encompass the legacy of the Australian community broadcasting sector in a way that allows the development of new and innovative digital content appropriate for diverse communities of interest.

Kath Letch
Station Manager