# Submission to

# **Productivity Commission**

Broadcasting Productivity Commission Locked Bag 2, Collins Street East PO, Melbourne VIC 8003

f: 9653 2305

e: broadcasting@pc.gov.au

## From

# 3MBS-fm Music Broadcasting Society of Victoria

146 Cotham Road Kew VIC 3101

e: melzer@mbsv.com.au

# **History**

The Music Broadcasting Society formed in 1968 when it was felt that there were no broadcasters meeting the needs of fine music enthusiasts.

Groups formed in Melbourne and Sydney when the ABC dropped classical music from its schedules.

Years of lobbying of the Federal Government by the MBS groups resulted in the granting of a new type of licence: community. Listeners could this determine program content. The stations pioneered the use of FM technology in a FTA format.

Since then, the MBS stations have depended on subscriptions for their survival and development. They receive no government funding. They represent a direct user pays format, even though they broadcast FTA. Listeners do not have to pay, but they do.

# Current

The Music Broadcasting Society of Victoria is constituted as a not for profit company limited by guarantee. Its membership is open and the station is governed by a Board of Directors on behalf of members. It has a small number of staff and over 150 volunteers.

Morgan research indicates that 3MBS attracts 100,000 listeners across each week. Of these, 5000 pay an annual subscription to the station. This is its main source of revenue.

## Major development

The biggest challenge facing radio is the introduction of digital transmission facility. Although this appears not to be a consumer driven change, its introduction will hamper the development of 3MBS because of the high start up costs.

Community broadcasters have been encouraged to believe that the government will allow them spectrum space in the new format, there appears little consideration for the entry costs for the third broadcasting sector.

**Consider:** A proportion of commercial licence fees for digital spectrum be used to support entry of community broadcasters to the same spectrum.

## **Public Interest**

Much research supports the position that without government regulation, social and cultural considerations would not be addressed by commercial broadcasters. Australian music content is an example where community broadcasters far exceed quotas of commercial stations.

Market/consumer driven commercial broadcast programming does not support educational interests. 3MBS broadcasts music programmes aimed at children at the primary, secondary and tertiary levels.

**Consider:** Legislative requirements for commercial broadcasters to provide

educational programmes. Alternatively, funding support for such

programmes on community stations.

# Coverage of local significance

The profit motive and relative expense of local programming has meant the disappearance of coverage of issues of local significance in commercial media, especially in non-metropolitan areas.

3MBS records and broadcast up to 100 local music performances each year.

#### **Needs of children**

Unless they are significant consumers, the needs of children are ignored by commercial media. Community media, which has proven to be more responsive to community needs has a better record of programming in this area, but needs to be supported.

## **Educational broadcasts**

Market forces have meant the disappearance of educational considerations from commercial programming. If this commission is serious about including this issue in its scope, it should be serious about finding ways and means to support educational broadcasting in Australian media.

**Consider:** Legislation to ensure educational programmes on commercial media.

Alternatively, support mechanisms for this programming could be

devised for the ABC or community media.

# Access to physical infrastructure

Although community broadcasters may have access to spectrum, the physical infrastructure needed to access this will be beyond most stations.

## **Promotion of Australian culture**

It is apparent that commercial broadcasters utilise market driven programming which, especially in music terms, ignores Australian cultural values.

## Are Cultural and Social objectives met with less regulation?

If current practice can be used as a guide, the answer is clearly "NO".

## Competition

The ABC started a national classical music network only after the MBS stations in Sydney and Melbourne demonstrated that there was an audience for the music. The audience is small but significant. The ABC has virtually duplicated MBS programming.

The question arises of whether a national network, as one of only five operated by the ABC, dedicated to classical music can be justified.