Broadcasting Inquiry

Submission from:
Creative Broadcasters Ltd
May 1999

Introduction

The following is a submission by Creative Broadcasters Ltd. (T/A 4ZZZ-FM) to the Productivity Commission's Broadcasting Inquiry. This document addresses some of what we consider the key areas of the Broadcasting Issues Paper, Mach 1999.

As volunteer community broadcasters, the tight timeframe of the inquiry has limited the amount of input we have been able to make. It is our intention however to make further supplementary submissions as the inquiry progresses.

The changing nature of broadcasting

Technological advances, particularly in the last decade, are definitely starting to redefine the perception of what is considered broadcasting. The issues paper correctly points out that the notion of broadcasting on which the BSA was drafted has and will continue to change. However, consideration must be made to how the public perceives broadcasting as well as how technology changes the definition of broadcasting.

It is widely acknowledged that technology advances at a rate much faster than the consuming public is able to adapt. For example, there is still a great deal of debate surrounding the consumer's willingness to purchase new receivers for digital television and radio. In the instance of digital television however, the issue has been forced via legislation mainly for reasons of spectrum efficiency.

The advancement of broadcast technology has two polarising effects. One is to reduce dramatically, the entry costs to quality broadcasting. The other is to continuously redefine the definition of quality. Today we can purchase studio equipment such as CD and MD players much cheaper than we could several years ago. However, advancements such as digital signal processing (DSP) and Digital Radio Broadcasting (DRB) have redefined quality and are available but at great cost.

As community broadcasters, we are often limited in the adoption of new technologies by the capital investment required. This does however, provide an environment where innovation is almost a necessity. Our organisation ventured into the online environment at a relatively early stage (early 1995) with the establishment of a website and integration of Internet mail into our office environment. This has grown to a reasonably interactive website and a streaming audio server.

The convergence of the Internet with our existing broadcasting has had many benefits. The almost real-time nature of the Internet has provided the basis for a more interactive service to our audience and community. We have considered this to be valuable training for the increased interactivity offered by DRB

The downside is that the global nature of the Internet has resulted in quite a lot of interest and queries from listeners outside of our target community. Whilst other broadcasters may consider this a benefit, for us it uses resources which could otherwise benefit our own community.

The public Interest and the objectives of broadcasting policy

The problems
Australia's broadcasting industry is comprised of a wide variety of groups, organisations and individuals. The agendas, objectives and goals of each will vary widely. Certainly, some broadcasters would address the social, cultural and administrative problems that the legislation in the BSA seeks to address as a matter of community conscience.

However, our opinion is that a great number would only address these problems if it was of benefit to the broadcaster to do so. We consider this to be a major problem inherent in commercial broadcasting. To this end, legislation is unfortunately necessary for the overall benefit of society.

Social dimensions of the public interest
Community Standards
In the context of the BSA, community standards are upheld through legislation covering Program Standards. For most broadcasters, this is through the relevant industry codes of practice.

As a community broadcaster, the system of regulation through the CBAA codes of practice has been a major improvement. This has been primarily due to Code 2.2 of the CBAA codes of practice:

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2.2    Community broadcasting licensees will avoid censorship wherever
       possible, however, consideration shall be given to the audience;
       the context; the degree of explicitness; the propensity to alarm,
       distress or shock; and the social importance of the event.
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We feel that this code considers the primary target audience of a program in relation to what the BSA defines as 'community standards' commensurate with some of the niche programming of community radio.

Physical Infrastructure
As we have outlined previously, technological advancement has had a two pronged front to broadcasting, and in particular community broadcasting. It is now possible to build a basic, broadcast quality radio studio for a fraction of what it would have cost less than 10 years ago. The same movement in technology brings us DRB and in time, an increased consumer expectation on the quality of broadcasting.

Having affordable access to the physical infrastructure used to broadcast is absolutely essential. With the move to DRB will come increasing consumer expectations for the quality of delivered media. Some community stations may find themselves in the situation of being unable to reach their target communities without affordable access to this new infrastructure.

Promoting Australian identity and culture
It is our opinion that the advent of new media built upon currently emerging technologies will have a great impact on Australian culture and identity. We have already witnessed increasing importation of American culture through existing Australian media - an indication of the degree of influence

broadcasting has on identity and culture.

The existing broadcasting policy attempts to promote Australian identity and culture primarily through regulation of minimum Australian content quotas. Although this policy has great benefits for industries supporting the production of Australian programming, it does not directly promote Australian identity and culture.

Australia's current broadcasting regulation

Principles of regulation
The 'degree of influence' of particular broadcasting service is complicated to quantify. It depends on many factors including:

- available access to the service
- particular content of the service
- community opinion that is being addressed
- size of the audience

For example, JJJ will have a much greater degree of influence on youth music views than a locally produced music video program on community television.

The type of broadcasting service itself does not satisfactorily indicate a degree of influence. It is therefore reasonable to suggest that any regulation be technology neutral.

The role of the Australian Broadcasting Authority

Co-regulation
For us, the adoption of industry based regulation has been a positive step. The CBAA codes of practice acknowledge the uniqueness of the community broadcasting sector, it's importance to the community.

Complaints
In general, the current complaints handling process works well. Program complaints being made to the broadcaster first, gives ample opportunity to address a complaint in terms of the codes of practice. In a high percentage of cases, the process ends at that point.