

Land and Water News

10 No - 1972

Presiding Commissioner Professor Richard Snape Productivity Commission (Inquiry into Broadcasting Legislation) Locked Bag 2 Collins Street East PO MELBOURNE VIC 3000

Tuesday, May 17, 1999

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24 MAY 1999

Productivity

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Dear Professor Snape

## Submission to Broadcasting Act review

I edit a small, independent newsletter called *Land and Water News* (aka 'LAWN'). We also operate two associated Internet-based information services in the environment/natural resource management area. They are 'LAWNads' (email job advertisements), and 'LAWNinfo' (email general advertisements).

I am not familiar with the several Federal Broadcasting Acts you have been asked to review. However, I do work at the cutting edge of competition between media services, and am aware of some of the anti-competitive restrictions which face small players (such as ourselves) operating in the media industry.

My contribution to this inquiry is a plea not to de-regulate some aspects of the media industry in isolation, when there are other aspects in which anti-competitive behaviour remains entrenched.

I offer the example of newspaper classified advertising — particularly recruitment advertising. In marketing LAWNads to potential clients we are regularly refused advertisements by State Government agencies on the grounds that 'we are required by legislation to advertise in X (name of newspaper), and your service, although much cheaper, would represent an additional cost'. Similarly we are regularly told by Federally funded projects (eg: Natural Heritage Trust projects) that 'as a condition of receiving funding, we are required to advertise in the national press' (which apparently doesn't include us, although we are national).

Many of the public servants we deal with believe — rightly or wrongly, we have no way of knowing — that they are legally required to advertise in a particular newspaper (or sometimes two), and that any service we try to sell them must be considered as additional to, not instead of, their existing advertising outlets.

This is particularly frustrating because we offer a proven service, which costs roughly a tenth of the price of newspaper advertising, and has a national, very-targeted reach (more than direct 3,000 subscribers – see www.webmedia.com.au/lawn).

We would like an even chance to compete, and would not like to see this industry become less regulated until the playing field really is level.

Yours sincerely

David Mussared

**Editor**