

**SUBMISSION BY**  
**MEDIA, ENTERTAINMENT & ARTS ALLIANCE**  
**TO**  
**AUSTRALIAN COMMUNICATIONS AND MEDIA AUTHORITY**  
**REGARDING**  
**CONSULTATION DRAFT**  
**GUIDELINES FOR NARROWCASTING SERVICES ON TELEVISION**  
**MARCH 2007**



**The Media, Entertainment & Arts Alliance**

The Media, Entertainment & Arts Alliance (Alliance) is the industrial and professional organisation representing the people who work in Australia's media and entertainment industries. Its membership includes journalists, artists, photographers, performers, symphony orchestra musicians and film, television and performing arts technicians.



The Media, Entertainment & Arts Alliance appreciates the opportunity to comment on the Consultation Draft for Guidelines on *Narrowcasting Services on Television* released by the Australian Communications and Media Authority (ACMA) in February 2007.

Last month, the Alliance commented on ACMA's consultation paper, *Allocation of spectrum for new digital television services*. The Alliance submission argued for considering the needs of community broadcasting and Indigenous broadcasting.

The Alliance recognises that the Guidelines for *Narrowcasting Services on Television* allow for community broadcasting on both Channel A and Channel B. Given that incumbent free to air commercial and national broadcasters are not able to bid for Channel A and given the uses to which Channel A can be put, it is likely that community broadcasters will find bidding for Channel A a more viable prospect than bidding for Channel B.

However, as noted in last month's submission, community broadcasters are at a distinct disadvantage as not-for-profit organisations if they need to bid against commercial entities, especially in the context of an open outcry auction.

The Alliance is aware that the House of Representatives Standing Committee on Communications, Information Technology and the Arts (CITA Committee) has just released an interim report entitled *Community Television: Options for Digital Broadcasting*. The CITA Committee will be releasing a more detailed report later in the year. The release of the interim report was prompted by the announcement that Channel A and Channel B will be auctioned in the near future.

The interim report recognises "the community television sector's plight to gain access to digital spectrum, as promised to the community broadcasting sector by the Australian Government."<sup>1</sup>

Unlike the commercial and national broadcasters, community broadcasters do not currently have access to digital spectrum in order to simulcast during the years of transition to digital. Whereas the commercial and national broadcasters have spectrum for simulcasting and have guaranteed access to digital spectrum after analogue is switched off, community broadcasters are facing declining audience reach as consumers take up digital services and have no guaranteed access to digital spectrum following switchoff. The same is true for National Indigenous Television, due to commence broadcasting in the middle of this year, with no capacity to access digital spectrum, either for simulcasting or for broadcasting following switchoff.

The CITA Committee's recommendations are attached.

The Alliance recognises that the Government will wish to maximise income from the auction of Channels A and B. However, the importance of community broadcasting to Australians cannot be ignored.

The value of community broadcasting to society has been well articulated by others, most recently in submissions made to the CITA Review<sup>2</sup>. Audiences appreciate community television for what it offers in accessibility, diversity, localism and independence.

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<sup>1</sup> *Community Television: Options for Digital Broadcasting*, House of Representative Standing committee on Communications, Information Technology and the Arts, February 2007, page 1.

<sup>2</sup> *Inquiry into Community Broadcasting*, Community Broadcasting Foundation, April 2006, see online at [http://www.aph.gov.au/house/committee/cita/community\\_broadcasting/subs/sub114.pdf](http://www.aph.gov.au/house/committee/cita/community_broadcasting/subs/sub114.pdf)

Community broadcasting has a strong and growing presence in rural, regional and remote Australia. It contributes considerably to training. Yet it remains under-resourced and fragile. Unsurprisingly, given the associated costs of television broadcasting, community television broadcasting is even more fragile than its radio counterpart.

As Australia moves to a digital future, the Alliance believes it is essential that community and Indigenous broadcasting are not locked out of digital transmission. If community and Indigenous broadcasting are not allowed a digital future they will axiomatically become a thing of the past at considerable loss to Australian audiences. National Indigenous Television is only soon to become even a partial reality, commencing initially by way of an arrangement with *Imparja*. National Indigenous Television needs the time to build to become national in analogue and to continue on past the date for analogue switchoff with a guaranteed future in a digital environment.

Channel A and Channel B offer the possibility of a digital future for both community and Indigenous television broadcasting.

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*Tuning into Community Broadcasting*, Griffith University Centre for Public Culture and Ideas, March 2006, see online at

[http://www.aph.gov.au/house/committee/cita/community\\_broadcasting/subs/sub89.pdf](http://www.aph.gov.au/house/committee/cita/community_broadcasting/subs/sub89.pdf)

*Submission to the Inquiry*, National Indigenous Television Committee, see online at

[http://www.aph.gov.au/house/committee/cita/community\\_broadcasting/subs/sub80.pdf](http://www.aph.gov.au/house/committee/cita/community_broadcasting/subs/sub80.pdf)

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## Options for digital broadcasting

### Recommendation 1

The Committee recommends that the Australian Government sell the unreserved channel known as Licence A, with an obligation to be placed on the new licensee to carry community television during the simulcast period.

Additionally, the Committee recommends that:

- carriage would be at no cost to the community television sector, during the simulcast period;
- the terms of sale for Licence A will include the condition to simulcast community television by 1 January 2008, otherwise penalties on the new licensee will apply; and
- such penalties must be sufficient to ensure that community television is carried by 1 January 2008.

### Recommendation 2

The Committee recommends that, if Licence A does not sell before the end of 2007 with a 'must carry' community television obligation, the Australian Government:

- temporarily allocate sufficient spectrum from Licence A to a national broadcaster in order for it to carry community television during the simulcast period; and
- allocate sufficient funding for that national broadcaster to cover the costs of digital community television transmission during the simulcast period.

### Recommendation 3

The Committee recommends that the Australian Government, at analogue switch-off:

- convert the spectrum band known as Channel 31 to digital; and
- permanently allocate it to current and future community broadcasters.

### Recommendation 4

The Committee recommends that the Australian Government provide funding of \$6 million to the community television sector for the conversion of broadcast equipment to digital, and recommends that this funding be made available immediately after a simulcast arrangement has been made.

### Recommendation 5

The Committee recommends that the Australian Government provide funding of \$1.7 million per year to the community television sector for each year of simulcast.