

1 April 2010



Regional Radio Content Review
Radio Broadcasting Section
Department of Broadband, Communications and the Digital Economy
GPO Box 2154
Canberra ACT 2601

By email: regionalradioreview@dbcde.gov.au

Dear Sirs,

REVIEW OF REGIONAL COMMERCIAL RADIO LOCAL CONTENT REQUIREMENTS

I make this submission on behalf of the Community Broadcasting Association of Australia (CBAA), the national peak body for community broadcasters in Australia. There are over 300 community radio services operating around the country.

The CBAA strongly supports the Government's commitment to ensuring that Australians living in regional areas should have access to broadcasting content that reflects the culture and diversity of their local communities. We agree that there should be no reduction in the local content that is currently being broadcast in regional Australia.

Our submission relates to the first and second 'Key Issues' in the Discussion Paper.

Local Content in Community Broadcasting

As a sector created to develop and reflect a sense of Australian identity, character and cultural diversity, community broadcasters feel very strongly about 'local content'. It is of the essence of community broadcasting, which is media created by community members for their communities.

In other media sectors, 'local content' is often taken to refer to Australian content. For the community broadcasting sector, 'local content' means content which is produced in the local community and is directly and locally significant to Australians living in those communities.

According to the Community Broadcasting Database (CBD 2007-2008), in our sector the national average of locally-produced content is 129 hours per week, accounting for 77 per cent of all content broadcast. Australian community broadcasters produce 77 percent of their content at the local station level. Moreover, community radio broadcasts 36 per cent Australian music, significantly exceeding our quota of 25 per cent.

Australians want this local emphasis. The 9.5 million Australians who listen to community radio each month report that they value most the local content and diverse music formats that community radio delivers (McNair Community Radio National Listener Survey (2008)).

Indeed, the community broadcasting sector is growing strongly because of our commitment to local content. It has grown by almost 50 per cent since 1996 and the biggest growth has been in regional, rural and remote areas. Currently 80 per cent of long-term licensed community radio and TV services are located in regional and outback Australia.

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Local Content in Regional Commercial Broadcasting

According to the most recent figures in the CBD, thirty per cent of community radio stations report that they are the only sources of local programs for their communities.

When one turns to the local content obligations currently required of regional commercial radio licensees, it is easy to see why Australians, particularly those in regional and outback areas, have such a thirst for local content.

The majority of regional commercial radio licensees are required to broadcast three hours of local content during the 15 hours between 5am and 8pm each weekday. On the most generous interpretation, this is 20 per cent local content. However, if you factor in the full 168 hours of the week across which people can and do listen to radio, the figure drops to nine per cent local content.

For 16 per cent of these licensees (who broadcast in 'small markets'), the requirement is to broadcast 30 minutes local content per weekday, or just over three per cent local content. Again, if you factor the entire 168 hours of the week, those broadcasters are only required to broadcast 1.5 per cent local content per week.

Remote area and racing radio broadcasters must broadcast only five minutes of local content each weekday. This is so small a requirement as to be negligible.

Our Submission

The CBAA considers that if an area of regional Australia constitutes a 'market' that viably can be tapped through advertising, then it also constitutes a group capable of generating enough local content to meet the needs of its community.

While many community broadcasters are volunteers, commercial radio licensees employ those who exercise a professional skill and insight that is critical to Australian society. Each part of the media sector – public, commercial and community – has a different and important role play.

The community broadcasting sector is clearly focused on providing its own brand of local content to regional and remote Australia. In contrast, the Review puts forward as a 'Key Issue' that greater flexibility be provided for regional commercial radio broadcasters by spreading the same small amount of local content across both weekdays and weekends. In essence, this proposes *diluting even further* the local content that commercial broadcasters must provide to local audiences.

Greater flexibility for regional radio broadcasters is hardly the pressing need to be addressed. If, as the Review clearly states, "the broad intent of the regional commercial radio localism provisions remains valid" then regional commercial radio licensees should be required to broadcast material of local content *in addition* to what is already required. The opportunities for coverage of local weekend issues and events in regional and remote Australia are too obvious and numerous to mention.

Finally, having noted the important role commercial broadcasters play in regional and remote Australian communities, we note another important means by which the Federal Government can support the production of local content for these communities: by supporting the community broadcasting sector's Vision 2015 Budget Submission to Minister Conroy (accessible from the CBAA home page www.cbaa.org.au).

The Future of Local Content

As the Government reviews local content requirements in 2010 and beyond, the CBAA offers its support and assistance.

The CBAA looks forward to the Government's response to the issues raised in this letter and to our sector's inclusion in any working group or sector-wide advisory body concerned with ensuring local content in Australian media.

Please do not hesitate to contact me should you wish to discuss any aspect of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Bawden', written in a cursive style.

Michele Bawden
CBAA General Manager

cc. Emma Dawson, Adviser
Office of Senator the Hon Stephen Conroy