

February 23rd 2010

The Manager
Wireless Satellite and Digital Dividend Section
Department of Broadband, Communications and the Digital Economy
GPO Box 2154
Canberra ACT 2601

Re: Submission to the Digital Dividend Green Paper

Dear Sir /Madam,

Please find following our response to The Digital Dividend Green Paper.

Our interest in this area is as a user of wireless audio devices including radio microphones, wireless transmitters and in ear monitoring systems.

As a freelance television location sound recordist working primarily in the domestic television market I use a myriad of radio microphones, IFB, Comtec, timecode transmit and receive equipment, video send & receive equipment on a regular if not daily basis.

As a freelance operator I buy and maintain all of my own equipment. Under the proposed legislation / digital dividend I will lose the use of at least six radio microphones alone. The cost in replacing these items let alone the economic impact of losing these items as working instruments earning income starts at \$25,000 in replacement cost alone.

The financial cost in economic terms from lost income will be many more times that as replacing equipment will become a maddening dash as more and more people swamp the manufacturers for either replacement equipment or upgrades which in itself will push up the cost of replacing equipment under the most basic rules of supply and demand so in real terms the replacement cost for my equipment could be pushed up as high as \$40,000 as supplies tighten.

This is an extremely competitive market to work in and if you do not have enough equipment you just don't get the work. If you don't get the work you can't upgrade, repair, replace equipment.

As the minister for communication and for that matter every minister from the Prime minister down should be very very aware of just how many radio microphones are used at the average press conference.

Many, well all of the stations have laid off the company sound recordists in favour of a cameraman equipped with one radio microphone.

The only real exception now is the ABC as even SBS has now laid off all but one of it's sound recordists.

Once the spectrum is sold off you will quite literally fall on deaf ears as the networks no longer have anywhere near enough staff to cover all events or press releases in accordance with current OH&S Issues.

Considering the impact the global financial crisis has had on advertising revenue all of the networks have been feeling the financial squeeze shedding staff where ever they possibly could from all departments with newscast (news and current affairs) bearing the brunt of such cutbacks.

One only has to watch the news these days to see how thin the content has become due to budgetary cuts more and more VNR's (Video News Release) mixed in with overseas news stories are more the norm now as stations try not to send crews out in company cars, with a journalist plus all of the associated costs hidden and otherwise contained within that.

The spectrum sell off as part of the digital dividend will greatly impact on a weakened Segment of the television industry.

Local news will become a smaller and smaller area as the same story will be repeated throughout an entire network nationally as it will be deemed as cheaper than sending out multiple crews to do the political, industrial and philanthropical based stories we used to see on a daily basis.

Considering there is about 300 location sound recordists in this country who will on an industry average lose somewhere in the region of \$30,000 dollars worth of equipment each, so equipment replacement costs will be in excess of \$9 million dollars, all of it exported money as we have no viable local manufacturers in this niche market.

When added to a combined average turnover of \$7.2million dollars based on a 48 week working year as a raw cost without any add-on's or additional market value associated with either News or production work added on to that costing. This also is not adding in the many cameramen who have their own equipment again we are talking 300 plus people who will lose an average of \$4,000 dollars worth of equipment each so again that's another \$1.2 million dollars of equipment lost to the industry that will have to be absorbed by owner operators adding more cost to news and production work.

I would consider the potential sale of the spectrum available in this country for between \$10 or even \$20 Billion dollars as nothing more than selling out the working people in this country. It's like selling off all of your furniture and personal effects to pay the mortgage.

If those of us who use wireless devices as tools and they are legitimate tools much in the same way a carpenter may look at a hammer or an electrician a screwdriver, the \$40 Billion dollars in working turnover we collectively generate let alone number of people employed directly or indirectly and I would estimate I probably help to keep at least five people employed indirectly far outweighs any cash sale to a singular employer or telecommunications company in value many times over.

We really do need access to the full spectrum from 520mhz to 820mhz as an absolute minimum to keep the myriad of industries who use short range wireless devices free to carry on without any hindrance.

If you do enjoy a night at the theatre, news and current affairs, ever go on holiday work out at a gym or attend religious services, conferences or other industry related events you will be destroying the very jobs and industries you may partake in as a work or social event.

This must be taken in to consideration if any spectrum re-stacking is done in a manner which takes in to account the myriad of industries in Australia who use wireless products in a professional or otherwise manner.

The economic backlash from the media in re-equipping could very well be tangible in a lack of media attention at the next government press release be it those in power or opposition, state or federal government.

As a part of a very large group of people who contribute a sizeable amount to the nations GDP we expect.

- That wireless spectrum remains available to users such as ourselves and that the available spectrum is sufficient to accommodate current and future use
- That the uncertainty surrounding the future use of these products be resolved as soon as possible. I will need to know so I can plan any future acquisitions of equipment plus notify my clients of and equipment changes that will effect their product be it production or news related.
- That there is sufficient time between the determination of future spectrum access within the 520Mhz and 820Mhz band for organizations such as ours to make the necessary changes
- That our right to use these products under the Low Interference Portable Devices (LIPD) licence arrangements is acknowledged and that similar arrangements continue into the future

- That the Government recognise that there are real replacement costs associated with the change of spectrum, including the decommissioning of existing equipment and its replacement with new equipment appropriate for use within the new and as yet to be determined, frequencies. *As the editor of the Australian Freelance forum I have about 80% of the nations freelancers on my database so also communication any governmental decisions will also take a chunk of my time again removing me from real economic activity.*
- *The wireless devices we use on a daily basis have a working life of about 10 years so these items are ruggedly built to withstand working in the harshest environments nature can throw at them day in day out for years with minimal servicing.*

We understand that the Australian Wireless Audio Group (AWAG) are preparing a response to the Green Paper. As a user of the products referred to by the AFF& AWAG members we feel that the AFF and AWAG are better placed to provide the kinds of detailed analysis and responses to the technical, economic and social implications being sought by the Green Paper and, in particular, with reference to questions 3.33, 3.34, 3.35, 3.36,. 3.37, and 4.6.

We would therefore like to add our support as a freelance operator and editor of the Australian Freelance Forum to the AWAG response.

Should you wish to contact me regarding this matter you can do so on 0409327340 or aus.freelance@optusnet.com.au

Yours faithfully.

Nigel Fox
Owner / Editor
Australian Freelance Forum