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This is my submission in respect to:

- Community Broadcast (A)
- T.B.L.'s (Aspirants) (B)
- 1. watters (narrowcasters) (C)

To define the word productivity, it means in short, I invest \$10.00 I want \$40.00 back. If I don't get more back than invested amount plus the % I need to service the initial investment I can do one of three actions

1. I simplify the procedure or commodity to reduce initial outlay and gain increase on return OR
2. I combine with another service or commodity to enhance the return on both OR
3. If 1 and 2 still can't produce the desired result, the service or commodity must be terminated to save what little, if anything is left of the initial investment. (This is not as easy or as simple as it reads)

This productivity, but if the appropriate planning is done prior to setting up community Radio etc a lot of the existing problems would not exist like they do now, and neither would many aspirants.

My submission revolves around the above three (A) + (B) + (C).

I am quite **adamant that anything and everything** to do with community broadcast from purpose of intending broadcaster to the nuts and bolts on the antenna, should come under ONE roof ONE governing body.

The said body will provide the following requests prior to any granting of license.

1. The granting of **any category** of license for broadcast, said broadcaster must give and clearly state that 75% of granted ON AIR TIME will be Australian speaking programs.
2. Said license holder **will encourage** the **use of the Australian Language** in **all on air programs**.
3. Said license holder, must include the Australian language **on any and all** printed promotion material per page not per combined printing
4. Said licence applicant will submit with application the following
 - 4a. Intended executives for the first 12 months of existence, then within 14 days each and every change that may occur within said executive with NAME- ADDRESS-OCCUPATION forwarded to controlling body of radio broadcast.

4b. **THIS IS IMPORTANT** Said licence applicant must submit a financial statement with bank statement and give explanation to any and all large money, grants deposits etc, and from what group-society-organisation, and for what purpose, and will said, any one group, continue to give said amounts, and how often, and if said amounts do not show in initial documents presented, does said applicant anticipate any such amounts in the next 12 months or there after (Let's say \$ over \$2000=00 any one time).

4c. The request in 4b will exclude any proven or shown, fund raising projects that **DON'T** have a substantial money input to achieve said aims of fund raising event, if it does then 4b will apply.

4d. The applicant must agree to keeping all financial records on paper NOT DISC and be accessible by all financial members of said applicant group and appropriate authority in each state (Vic = O-F-T). I suggest paper up to \$60 000=00 per annum as aspirants to achieve this will need large sponsor payments, to achieve this turn over.

4e. Any and all sponsor payments shall be to the applicant executive **NOT** the member obtaining the sponsorship, paying by own monies.

NOTE Items 4a to 4e are to identify any outside group whether they be sporting-political-religious or other, that attempt to effect an agenda after the licence has been granted for a different aspect of community broadcast, and said licence is representative of charter/conditions, that it has been granted for, and broadcast groups must abide by there commitment to obtain said licence, NOT vehicle of commitment to there own agenda at a later date.

5. Any and all applicants must submit there **CONSTITUTION** prior to granting of and said licence applied for
6. As is the norm said applicant will submit site-location –Antenna site etc but also the state of applicant broadcast and transmission equipment do they have access to proper maintenance and tuning procedures, that they will broadcast in a manner that is not damaging to other aspirants
 - 6a. If they (Applicant) does have access to said service or technician NAME-ADDRESS-TEL NO- or who-what-where, this is for immediate access to responsible individual or company, to address complaint or problem immediately it becomes apparent, and said persons-company-or service responsible for maintaining said broadcast within the perimeters of said licence and in a manner that's appropriate to other aspirants broadcasters, **MUST BE DISPLAYED**, in a position for all to see, and all be made aware of, not after these problems arise, but before any attempt what so ever, is made to sit in front of a microphone or touch any complementary equipment to broadcast
7. Each applicant must submit a procedures manual for **ON AIR BEHAVIOUR** and **CODE OF ETHICS**, whilst on air, and toward fellow broadcasters, once again this **is NEED TO KNOW BEFORE** you broadcast, **NOT AFTER YOU**

BROADCAST, and the damage is done, this also is a reflection on the stations management structure, as to how well they keep their house in order.

NOTE Have attached a copy of our code of practice as an example, even this is not hard enough on some applicants to be on air presenters we quite often find it is, and they believe it is, an extension to their own ego. If not detected quickly they can, and do, cause discontent among others before they go, but more important they will damage the stations credibility to a continuity of quality broadcast to much needed SPONSORS and LISTENERS and the A.B.A. does not need a complaining public before they remove the stations licence to broadcast.

8. **Frequency sharing I don't agree with**, as only too often the **behaviour of both** will **reflect on each other**, and if one station is worse than the other, the better station will suffer by overflow, as the listener is not programmed to separate, and in all cases won't bother to.
9. Define what exactly the government wants in a category of Broadcast because you cannot compare
 - A. Commercial with Community
 - B. Community with Aspirants
 - C. Aspirants with Narrowcasters

The economics and structure of economics to income is different in all aspects as is the method of obtaining same under present legislation BUT in this instance it does not mean that all successful applicants for licence will work totally within the mandate of the licence, many will if they have power, move quickly into a membership drive for their limited air time, to sustain their off air financial need to exist until next broadcast, should there be one,

10. To determine the productivity of any category of broadcast, it can't be determined by profit on income, because broadcast does not produce a saleable tradeable commodity of its own creation that will generate wealth within a community. The only thing that broadcast can produce is information and information cannot be bottled or packaged and this is why it must be clearly defined as to the category of broadcast which can only be based on the following

- 10a. A commercial category licence because of the economics involved, the stations profit is only as good as the
 - a) information it gives to the public
 - b) the truth of said information
 - c) information of **not only interest but a need to know** to the listening consumer
 - d) all information in the correct time slot to get to the right listener in the right place at the right time
 - e) this is a major investment for they will need broadcast information world wide
 - f) then the P.R. people will want to climb on the band wagon of successful broadcasting
 - g) the station will then charge as much as they think the market will stand or what they can get away with.

- h) The big loser here without doubt is the community information, because community information is very mundane by world standards and community information will not attract major-multi-national sponsors as community information is only of interest to certain age groups and these age groups are not big on access to the disposable dollar.

11. The question now is how many community information sharing stations should be in operation? (say Victoria)

11a. Country centres certainly need one that will broadcast the needs and entertainment of the community

11b. Cities and townships will need one, more so than ever with related welfare, that now is needed to address the economic and social problems and these groups and agencies want free air time.

11c. but there is still those in community radio (say up to 25 age group) who are only interested in chart music, a youth listening audience.

11d. The youth or young listening audience are very prone to junk purchase and being with the in people, this in turn starts to move into commercial radio territory, and when their investment is threatened, community radio becomes a dirty work

12. These categories of broadcast need careful well defined perimeters of operation, conduct, transmission power in relation to not only the terrain but antenna location as antenna height is very much the strength of broadcast.

13. True, community is not in the same ball park as commercial, but they are more vulnerable in their existence than commercial, not only by initial setup cost, but the reliability of supportive action by the community at large, as all community radio rely heavily on the integrity of volunteers, but this in turn puts greater risk on equipment use than commercial, because of the variety of age, personality and capability with knobs switches etc, there are times when you suffer in silence as the need for a presenter can outweigh the risk of damage, or close the station down, the will to broadcast will on occasion overcome logic of operation, to maintain an on air presence.

14. Although there is a lot more that needs to be on paper, but, the PRODUCTIVITY of any RADIO STATION can only be addressed by a clear defined mandate of operation and its responsibility to the type of listening consumer that any one station has to address, and this in itself is the biggest problem to wealth generation from the consumer or listening public.

15. The question of funding arises because of

a. What should the community have in the way of information radio.

b. What does the community need in the way of information radio

c. When you venture into this field you only address a certain age group and this is not an age group with mega disposable \$'s

d. This age group in its relationship with a community information sharing radio, **MUST BE IN THE SAME CATEGORY AS ETHNIC OR INDIGENOUS PEOPLES FUNDING FOR BROADCAST**

e. A community information radio does not attract the younger listener with gimmick, junk purchase money, as most feel they don't need to know about community resource for health and well being and community or city services, and some cities although proud of the services they offer, there budget constraints don't help, so community group service volunteers bear the burden and they in turn go to community radio for assistance in fund raising, volunteer workers etc and community radio can't turn these people away BUT it costs the station money and many sponsors, like a with it, go, go, image moving with the times **NOT the infirm.**

In conclusion I know community information radio needs strict guidelines, but it needs appropriate controlled funding to broadcast in a manner that's appropriate to the need to be informed and needs to be separated from a

- a) community chart
- b) community vested interest
- c) Religious agenda's
- d) Political motivational interest and agenda.
- e) By culture, self interest groups

What does concern me, when I look back over the years, are there more aspirants than there is air space, has narrowcast got out of hand, conversion to DIGITAL is going to send, force, community radio off the air, out of existence, the cost of conversion is, at this day, date, prohibitive for community radio and it is not necessary for the message that is being delivered by community radio, and the cost of maintaining such equipment is prohibitive because you don't have the technicians to service or repair such equipment.

In point you can't buy broadcast equipment from Safeway and though the Aust. Agent is keen to sell they are not so keen to service because the cost of a good R-F Technician is too costly for them to keep in constant employment so they sub out and this itself is a problem in disputes over quality of service on warranty or after sales service.

In closing (I am repeating myself) I have the impression that the definition of productivity in this instance, is to (by interpretation) to reject many aspirants, and it may be costly to some, disappointing to many. With community radio the age group running the station, as much as the age group and social level/standard that said broadcast of community resource is directed at, is very volatile in respect to funding said programs, and as far as a chart of productivity is concerned it comes back to base, as there is no return in a cash investment into welfare, and community resources as it will consume any and all money you put into it