

Submission to

# **Productivity Commission**

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To the Commission

[1] Further to the earlier submission from 3MBS-fm (May 99), I am writing to comment on the Draft Report on Broadcasting.

[2] The Draft Report states that the *Broadcast Services Act 1992* seeks to protect certain social and cultural values, including a sense of identity and cultural diversity. The Terms of Reference for the Commission include “.. balancing the social, cultural and economic dimensions of public interests ..”.

[3] The Report mentions the link between restrictions on media ownership, and consequential low relative number of players, and the need to regulate to protect the social and cultural dimensions.

[4] There is NO mention of the role of community broadcasters in this objective.

[5] There is also the assumption that an unrestricted market will protect social and cultural interests. HOW?

**There seems to be a questionable assumption that a diversity of media ownership will provide a diversity of programming.**

[6] The Draft Report seems to only link the social and cultural aspects of broadcasting with content regulation.

There is no mention of the role of community broadcasting in this regard. Community broadcasters consistently exceed their self-imposed Australian content quotas. Similarly, the Report ignores Community Broadcasting in respect to program diversity.

[7] The Draft Report seems to fall short in these crucial areas of the Terms of Reference.