

3ZZZ Response to Productivity Commission's Draft Report on Broadcasting Services Act.

- [1] As an ethnic language community radio broadcaster, servicing nearly 60 communities in Melbourne, 3ZZZ endorses the views expressed by the NEMBC in their response to the draft Report On Broadcasting.
- [2] We believe that the provision of a diverse range of ethnic language broadcasting has been a fundamental part of the development of a multicultural, tolerant and diverse society.
- [3] The existence of ethnic language community broadcasting has come about because of the active intervention by government and the community in the creation of a perceived public good. Without active government and community intervention there would be virtually no languages other than English broadcast in Australia.
- [4] 3ZZZ therefore welcomes the fact that broadcasting policy should meet social cultural and diversity objectives and a recognition that community broadcasting plays a role in meeting these objectives.
- [5] The station is however concerned that in the migration to digital broadcasting there is the possibility that these objectives could be submerged by market driven considerations. The Station would therefore like to see that government provide assistance to all licensed broadcasters in the transition to digital broadcasting. Particularly with a proposed future close down of analogue broadcasting, it is important that community broadcasting is simply excluded from new technology opportunities through cost.
- [6] Community broadcasting exists because its structure allows participation, access and the genuine provision of services not provided elsewhere. Note that these are not services that will ever be necessarily economic as businesses, but that do serve a fundamental part of maintaining an equitable and harmonious society.
- [7] Given these mixed objectives, 3ZZZ would be concerned that the proposed splitting of the spectrum allocation and broadcasting license allocation systems would potentially reinforce a perception that community broadcasting is a second class of broadcasting unlike commercial or government media. Having observed the current time delays in allocating licenses to aspirant community broadcasters, the station believes that this system may just further delay the process. It may be more beneficial to provide more resourcing to the ABA to enable them to complete the tasks they currently undertake.