

18 May 1999

Professor Richard Snape
Commissioner
Productivity Commission
Locked Bag 2
Collins Street East Post Office
MELBOURNE VIC 8003

Dear Professor Snape

I attach the ABC's submission to the Productivity Commission's review of the Broadcasting Services Act.

I look forward to discussing the issues raised at the public hearing called in Melbourne on 7 June, and in the meantime I would be happy to elaborate on any matter covered in our submission.

The ABC is preparing a supporting submission focusing on the economic and market impacts of public broadcasting, and this will be made available to the Commission at the beginning of June.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Brian Johns', with a stylized flourish at the end.

BRIAN JOHNS
Managing Director



AUSTRALIAN BROADCASTING CORPORATION

**SUBMISSION TO THE
PRODUCTIVITY COMMISSION
REVIEW OF THE
BROADCASTING SERVICES ACT 1992**

MAY 1999

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ABBREVIATIONS

| | |
|-------|---|
| ABA | Australian Broadcasting Authority |
| ABC | Australian Broadcasting Corporation |
| ACA | Australian Communications Authority |
| ACCC | Australian Competition and Consumer Commission |
| ATSC | Advanced Television Standard Committee |
| BSA | Broadcasting Services Act 1992 |
| CD | Compact Disk |
| GATS | General Agreement on Trade in Services |
| HDTV | High Definition Television |
| HF | High Frequency |
| ICAM | Indigenous Cultural Affairs Magazine |
| ITU | International Telecommunications Union |
| MFN | Most Favoured Nations |
| PBL | Publishing & Broadcasting Limited |
| SBS | Special Broadcasting Service |
| SDTV | Standard Definition Television |
| TRIPS | Agreement on Trade Related Aspects of Intellectual Property |
| UHF | Ultra High Frequency |
| UK | United Kingdom |
| USA | United States of America |
| VHF | Very High Frequency |
| WTO | World Trade Organisation |

ATTACHMENTS

1. ABC Charter
2. ABC Services Outline
3. ABC Audience Appreciation (including ABC Performance Study and other information)
4. Analysis of Television Programs by Genre 1998
5. ABC Links with Industry
6. ABC Code of Practice
7. ABC Submission and Preamble to DOCITA review on multi-channels
8. Brisbane News Analysis

TABLES

1. Selected genres, % of broadcast time, free to air television in Melbourne 1998

INTRODUCTION

The Australian Broadcasting Corporation (the ABC) welcomes the opportunity to make this Submission to the Productivity Commission's Inquiry into the *Broadcasting Services Act 1992* (the BSA) and related legislation.

The Issues Paper underlines this Inquiry's focus on the commercial and community sectors of the industry. Although consideration of the legislation covering the national public broadcasters is excluded from the Inquiry, the ABC seeks to impress upon the Commission the important role it plays to advance the public interest in broadcasting in Australia and hence its complementarity with matters before the Commission. It is important therefore that this Inquiry notes the role of the ABC and Special Broadcasting Service (SBS) within the broadcasting industry and Australian society.

Investment by Australian taxpayers over the past seven decades has resulted in a strong public broadcasting sector which balances the private sector.

Australia has a unique broadcasting system. The commercial and national public broadcasters have developed side by side, each contributing to the overall development of services for Australian audiences. The ABC is a comprehensive mainstream broadcaster, not a niche or supplementary broadcaster.

As a result the ABC has made and continues to make a major contribution to an effective, responsive and appropriate broadcasting system in this country. Its national reach and comprehensiveness, its programming diversity and innovation, and its non-commercial character, enhance the range and nature of media services and the public sphere in Australia.

This is in sharp contrast to developments in other countries. In the United States the commercial sector has dominated the industry, and PBS has operated at the margins. In Britain, as in much of Europe, the public broadcasting sector was a monopoly for many years. The increased range of free to air, pay and cable services has changed the balance, although in Britain the BBC and Channel 4 are still in a dominant position.

The unique balance between public and commercial broadcasting in Australia, means that decisions affecting the commercial sector cannot be insulated.

While the ABC is a major participant in the mixed economy of the Australian broadcasting industry, it is not wholly bound by the same regulatory considerations as other sectors. It is not wholly affected by the configuration of the commercial sector in terms of licensing, ownership or content regulation. The determining factors for the ABC's future is funding, access to spectrum and converging media developments.

The ABC has been at the forefront of developments in broadcasting for much of this century. Its role as a significant participant in the emerging digital and multimedia environment will continue to be important both for Australian citizens and the media industry as a whole.

The ABC has played an important role in the production and dissemination of Australian content. It will continue to do so, irrespective of the regulatory framework which determines ownership rules or levels of Australian content in other sectors of the industry.

The ABC's commitment to comprehensive local content (including drama, documentary, entertainment, news, current affairs, specialist information, music, children's, education and multimedia) is based on a fundamental belief in the importance of local content to national identity.

The ABC considers for instance, that local content regulation on television, combined with the public broadcasting charters, have established the strength of audience identification with and interest in contemporary Australian culture. The importance of this in helping to develop an Australian sense of place in a global media environment - and a platform for audio visual exports - cannot be underestimated.

The ABC is well placed to continue to play a central role in advancing the public interest objectives of broadcasting in the emerging digital environment characterised by globalisation, deregulation and evolution of new media.

This Submission focuses on the social and cultural aspects of the Issues Paper. The ABC will provide a supplementary Submission addressing economic issues. This Submission does not address all the questions raised in the Commission's Issues Paper.

Rather the ABC seeks to ensure that the Commission's recommendations in relation to the BSA are consistent with the Corporation's continuing centrality in contributing to the achievement of national objectives. This will be even more important as the media system evolves in future.

While the argument for the particular role of national public broadcasting will be conducted elsewhere, it is relevant to the outcome of this Inquiry that there continues to be a strong non-commercial presence in the broadcasting industry. This requires a commitment to appropriate funding to ensure that the ABC has a distinctive approach and sufficient scale to achieve operating efficiencies; has access to emerging technologies; is able to capitalise on cross-media production and has access to sufficient spectrum to ensure comprehensive reach.

The ABC is pursuing this objective in this Submission by:

- documenting the national public broadcaster's distinctive statutory obligations, structure and achievements;
- describing the ABC's position within the broadcasting system as a whole, including in relation to present regulatory arrangements; and
- assessing the significance of outcomes of major changes in the broadcasting environment through the introduction of digital broadcasting and international trade agreements.

This will allow the Productivity Commission to understand better, and allow for, the position of the ABC as a key vehicle for meeting public interest objectives in the broadcasting sector, both currently, and perhaps even more, into the future.

1. THE ABC'S OBLIGATIONS UNDER ITS OWN ACT

The ABC operates under a different set of principles and accountabilities to the commercial sector of the broadcasting industry. In this section the ABC's unique obligations and range of services are detailed. Evidence of the high degree of public support for the particular role and distinctive outcomes of the ABC is also presented.

1.1 The ABC's Obligations

Since its inauguration in 1932 as the Australian Broadcasting Commission, the ABC has played an important role within the Australian community and media industry.

The ABC's role differs from other broadcast service providers in Australia because it is driven by the principles of national public broadcasting¹ which seek to ensure-

- universality of access (geographic)
- universality of appeal (general taste and interests)
- contribution to sense of national identity and community
- particular attention to minorities
- distance from vested interests
- direct funding and universality of payment
- competition in good programming, rather than for numbers
- guidelines that liberate rather than restrict program makers
- public accountability.

Commercial free to air broadcasters have different imperatives including -

- defined licence areas
- concentration on broad appeal programs
- advertiser funded
- operated for profit.

Following passage of the *Australian Broadcasting Corporation Act 1983* (the ABC Act), the Corporation, was given specific public interest objectives to meet the programming needs of all Australians, as an independent broadcasting service. These programming objectives are largely contained in the ABC's Charter (see Attachment 1). It requires the ABC to provide broadcasting services which:

- are innovative, comprehensive and of a high standard;
- contribute to a sense of national identity;
- inform, entertain and educate;
- reflect the cultural diversity of the Australian community; and
- provide a balance between programs of wide appeal and specialised broadcasting programs.

¹ See discussion in Marc Raboy, *Public Service Broadcasting: Cultural and Educational Dimensions*, UNESCO, 1995.

The ABC Act (s.27) also requires that the ABC maintain an independent news and information service and to broadcast Australian and international news daily. The ABC also has a particular Charter obligation to promote the performing arts.

The ABC has the power to undertake other activities related to its Charter functions which include the establishment of orchestras and the publication of material. In 1995, the ABC established the ABC's website, ABC Online, to further meet its obligations to serve the public with an emerging new media.

1.2 ABC's Range of Services

The ABC provides a range of services to meet its obligations under the Act (see Attachment 2). These services are freely available to all, and are commercial free. The broadcasting and online services provided by the ABC include -

- four national radio networks providing specialised programs, news, information and sport; youth programs and fine music;
- a network of metropolitan and regional radio stations;
- an international radio network, Radio Australia;
- a national television network; and
- an online network of web sites.

1.3 Public Perception of the ABC

The ABC enjoys wide public support and has done so throughout its history². Furthermore studies of preparedness to pay for public activities demonstrated a willingness to pay up to seven percent more for tax-funded arts and public broadcasting services, to be covered by cuts to other nominated areas of public outlays.³

In his 1996-97 review of the role and functions of the ABC, Mr Bob Mansfield said he had been overwhelmed by the public response to his call for public Submissions, and that the number of Submissions received "indicates the strength of feeling many Australians have concerning the value of the ABC. Most private companies would envy the passion and loyalty that characterises the relationship of the ABC with its audience"⁴.

Audience research undertaken by independent research organisations over the years has consistently confirmed strong public support for the ABC (see Attachment 3). For example, in a recent Newspoll research project into public perception of the ABC, commissioned by the ABC in December 1998, the results show:

- over 85% of the survey population regard the ABC as very or quite valuable to the Australian community (see Section 7)

² Ken Inglis, *This is the ABC*, Melbourne University Press, 1983.

³ Glenn Withers, David Throsby & Kaye Johnstone, *Public expenditure in Australia*, EPAC Commission Paper No 4, Canberra: AGPS, 1994

⁴ Bob Mansfield, *The Challenge of a Better ABC*, January 1997, p 4

- more than 80% of the survey population believe the ABC is doing a good job on a range of performance measures including-
 - broadcasting programs that are different from commercial outlets
 - promoting Australian arts and culture
 - contributing to the Australian identity (see Section 8)

It is clear for the vast majority of Australians that the ABC is an important participant in the broadcasting industry, and that it meets its Charter obligations for programming which addresses the diverse needs of the Australian public.

2. THE ABC AND THE BROADCASTING INDUSTRY

The broadcasting industry has changed a great deal since its inception, both in terms of services offered and the regulation under which it has operated. Broadcasting, like other media services, has long been recognised as having a distinctive social, cultural and political role which distinguishes it from other industries, and provided a particular rationale for regulation⁵.

This informed the establishment of strong public broadcasting regimes in many countries. Indeed in much of Europe public broadcasting enjoyed a monopoly until recent years when it had to contend with competition from commercial and subscription broadcasters. Conversely, in the United States, public broadcasting was the newcomer and failed to develop comprehensive audience appeal.

In Australia, however, the national public broadcaster has operated side by side with commercial licensees from the outset, first providing radio broadcasts and later television programs. Subsequently community and multicultural broadcasting services were also introduced to satisfy the increasing diversity of Australian society which was not adequately met by the existing broadcasting market.

In 1992, the BSA again further widened the range of services available in Australia to include subscription broadcasting and narrowcasting services and open narrowcasting services (both radio and television).

In recognition of the different roles and impacts of the various sectors of the broadcasting industry and their differing roles in the Australian community, Parliament established separate regulatory rules for each. National broadcaster legislation covered the two national public broadcasters - ABC and SBS - in recognition of their independent status. Each has its own Board and Charter. Regulation of the commercial free to air, pay and community sectors was contained in the BSA.

2.1 The ABC's Distinctive Role

Operating under its own legislation, the ABC has a distinct role within the broadcasting sector. Its distinctiveness is evident from its structural independence, accountability and funding, and its output including program diversity, comprehensiveness and Australian identity.

Structure

- **Independence**

The independence of the national public broadcaster was a central issue for Parliament when it passed the ABC Act. This gave the Board a clear duty to 'maintain the independence and integrity of the Corporation'(s. 8 ABC Act). The Minister does not have the power to direct the Corporation, except in the limited circumstances to broadcast an announcement in the

⁵ Julianne Schultz, *Reviving the Fourth Estate*, Cambridge University Press, 1998, ch 2,3

national interest (eg. the outbreak of war) (s.78 ABC Act). The ABC enjoys both administrative and editorial independence.

The importance of ABC independence, particularly in relation to the broadcast of news and information programs, is reflected in the further requirement that the ABC develop and maintain an independent service for broadcasting news and information, providing daily, regular sessions of news and information on both ABC radio and television (s.27 ABC Act).

- **Funding**

Another significant difference between national public broadcasters and other sectors of the industry derives from their direct funding by Australian taxpayers.

As the national public broadcasters are funded directly from the public purse they are distinctive. This funding regime has a direct impact on the nature of the programming produced and the relationship with audiences.

While the ABC recognises its obligation to produce programs of general appeal it also has the capacity and responsibility to address specialist interests. As a result there is greater independence and diversity in programming on the national public broadcasters than is possible for commercial free to air broadcasters, who are obliged by their requirement to operate profitably to maximise audience numbers⁶. Commercial broadcasters present programs of wide appeal necessary to build audiences to attract advertising revenue. Operating for profit, their primary accountability is to their shareholders.

- **Accountability**

Independence and public funding demand a high degree of accountability. National broadcasters are directly accountable to Parliament for their performance in meeting the public interest goals of their charters. The Australian Broadcasting Authority (the ABA) has only limited roles in relation to national broadcasters (see discussion below).

The ABC achieves accountability through a Corporate Plan which is provided to the Minister. Progress against the Corporate Plan is outlined in the Annual Report to Parliament. Other accountability mechanisms include audit of ABC accounts by the Australian National Audit Office, appearances before Senate Estimates and other Parliamentary Committee hearings and responses to Parliamentary questions and correspondence.

The ABC accepts an obligation for accountability in its program output. It achieves this by preparation and adoption of comprehensive editorial guidelines which provide detailed guidance for program makers, journalists and producers. Complaints are dealt with by senior staff, and where necessary are referred to the Independent Complaints Review Panel.

⁶ Ross Parish, *The Political Economy of Broadcasting*, University of New England, 1968, p 5-6

Output

- **Program Diversity**

Program diversity covers the range of subject matter and its treatment and presentation. ABC programming is qualitatively and quantitatively distinct to that produced by the commercial sector. This is recognised by both audiences and the industry.

The ABC undertook an analysis of television output over calendar year 1998 by genre, based on data provided by AC Nielsen. The breakdown shows programs as a percentage of total broadcast time by capital city by genre (the genre was nominated by the broadcasters and recorded in the AC Nielsen data) (see Attachment 4).

The table below illustrates quantitative differences between the ABC and commercial networks.

Table 1- selected genres, % of broadcast time, free to air television in Melbourne 1998

| | <i>ABC</i> | <i>7</i> | <i>9</i> | <i>10</i> | <i>SBS</i> |
|--------------------|------------|----------|----------|-----------|------------|
| <i>Documentary</i> | 11.2 | 0.8 | 3.0 | 0.5 | 11.6 |
| <i>Movies</i> | 2.1 | 14.9 | 8.6 | 6.8 | 14.3 |
| <i>Children's</i> | 26.2 | 17.9 | 8.4 | 14.5 | 2.0 |
| <i>Sport</i> | 7.7 | 17.3 | 16.2 | 14.0 | 13.1 |

Source: AC Nielsen Pty Ltd

The following list points to qualitative differences within genres. The programming focus and approach of the national broadcasters is different to those of the commercial industry. For example, the different content and style of presentation of the current affairs programs listed below are easily discerned by viewers who have come to expect a different level of analysis and approach to public events from the national public broadcasters. While the current affairs programs on the commercial networks have won high ratings, the need to win and maintain large audiences has shaped and distorted news agendas⁷.

ABC: 7.30 Report, Four Corners, Foreign Correspondent, Stateline

SBS: Dateline, ICAM

7 Network: Today Tonight, Witness, 11am

9 Network: 60 Minutes, Today, A Current Affair, Sunday

10 Network: Good Morning Australia

Another significant difference between the ABC and its commercial counterparts is the contribution the national public broadcaster makes to the delivery of independent news and information to the Australian public. The ABC employs journalists and broadcasters throughout Australia and internationally. This ensures a much wider range of news and information is available to Australian audiences than would otherwise be available. The ABC

⁷ Jana Wendt, Andrew Olle Memorial Lecture, NSW Parliament House, November 1997

takes its obligation to present a diversity of voices and opinions very seriously, recognising that informed debate, discussion and analysis is essential to a democratic society.

In a study jointly commissioned by the ABC and the Australian Key Centre for Cultural and Media Policy in 1996, Prof. Graeme Turner underscored the importance of the ABC in the provision of independent news and current affairs in Brisbane⁸ (see Attachment 8).

His major findings for the Brisbane market include:

- through its various radio (4QR, RN, PNN, JJJ) and television outlets, the ABC is the only significant provider of current affairs radio in the market
- the ABC is the largest provider of news
- the ABC broadcasts the only wholly locally produced news bulletins
- in television current affairs, the ABC was more likely to cover issues as well as events
- in television current affairs, there is a particularly marked difference in story selection between ABC and commercial current affairs programs
- 4QR's service is conclusively more comprehensive
- over the programming surveyed, the ABC was at least twice as successful in preserving balance in its treatment of stories which require such balance.

In the public's view, the ABC certainly provides diverse programming, distinctive to that provided by other broadcasters.

In a 1995 survey conducted for ABC Television by AGB McNair, approximately 83% of adults selected ABC Television as being the channel 'most unlike' the other (commercial) channels. When asked to say which pair of channels was most alike, only about 3% selected a pair including ABC Television and a commercial channel.

Clearly, the ABC, under its own Parliamentary mandate and funding, is - and will continue to be - an important provider of independent and diverse programming within Australia.

- **Comprehensiveness**

The ABC Charter requires the ABC to provide comprehensive broadcasting services. The ABC does this by providing a balance between programs of wide appeal and specialised broadcasting programs across its package of broadcasting and online services.

No equivalent obligation is imposed on licensed services under the BSA. The definition of commercial and subscription broadcasting services (sections 14 and 16 BSA respectively) do not take account of "specialised services", but only provide for services "...intended to appeal to the general public".

Narrowcast services, by definition, do not purport to be comprehensive.

⁸ Graeme Turner, *Maintaining the News*, 1996 reproduced in the attachments to the Submission

The licence requirement imposed on commercial broadcasting does not require a broadcaster to be comprehensive in its own right. Rather it requires comprehensiveness across a licence area. Each commercial television licensee is also subject to the licence requirement that:

“...(a) the licensee will provide a service that, when considered together with other broadcasting services available in the licence area of the licence (including another service operated by the licensee), contributes to the provision of an adequate and comprehensive range of broadcasting services in that licence area” (clause 7, Part 3, Schedule 2, BSA).

Comprehensiveness also has a geographical element for the ABC. Unlike commercial services which operate in limited licence areas, the ABC’s responsibility is to provide comprehensive services to all Australians, wherever they live.. The ABC takes this responsibility seriously and is looking forward to new opportunities to better serve audience needs and interests by the introduction of digital broadcasting and emergent technologies. (See Attachment 7 ABC preamble and Submission to DOCITA multi channel review.)

- **Australian Identity**

The ABC addresses the issue and nature of Australian identity by the creation of Australian content, and by providing forums for dialogue, discussion and debate. The ABC strives to develop distinctive Australian content in radio, television and online to the greatest level possible within the limits of its available funding. By developing cross media production skills and outputs the ABC is enhancing cost effective and appealing media content.

ABC’s unified structure of television, radio and on-line allows for exchanges between Australians regardless of where they live. For instance, the ABC is unique in that it delivers rural and regional content to the cities, with specialised rural programming available on radio, television and online. There are regular rural programs on TV (“Landline”) and radio (for example, “The Country Hour” on Radio National) and ABC Online has a dedicated rural website. As a result the voices of regional Australia are heard not only in regional Australia but across the country, enhancing a sense of national identity. The ABC strives to ensure that the flow of information moves in a number of directions, not simply outwards from a centralised source as is increasingly the case for the commercial networks.

Works cited in this Submission⁹ point to a tendency towards greater centralisation of content, especially in news gathering and production. The ABC’s wide regional network allows regional coverage of local issues, which, equally importantly, can be heard in other parts of Australia.

The development of digital technology will expand and enhance this dialogue. The introduction of simpler and cheaper digital cameras allows broadcast quality material to be obtained and exchanged. This will increase television access to regional material in a way that only radio and text have been able to exploit readily to date.

- **Costs**

⁹ Turner op cit note 7, Collingwood note 14 below

The ABC's programming outputs and services are obtained in a cost effective manner. As has been well documented the ABC operates under considerable financial restraint. Nonetheless it has achieved operating efficiencies, which are being increased by a cross-media mode of operation. As has been established in the past, and contrary to some preconceptions, the ABC produces its programs at efficient unit costs¹⁰, including relative to commercial broadcasters.

This has been demonstrated graphically in recent years with the development of ABC Online, which ranks as one of the most popular online sites in Australia. This was developed after an initial investment of \$750 000 and a total expenditure of less than \$5million over four years. This compares with the documented costs of many millions of dollars to establish comparable commercial online services¹¹.

2.2 ABC as part of a diverse industry

When the ABC Act was presented to Parliament, the Second Reading Speech of the then Minister, the Hon. Michael Duffy, made it clear that the Charter was drawn to give the ABC direction and a settled place in the broadcasting industry. He said-

... for years the ABC has suffered from the lack of an adequate definition of the role it should play in the Australian broadcasting system. Over the years, this has lead to uncertainty in the organisation about the direction it should take - whether to concentrate on wider appeal programming or whether to provide the sort of specialist programming not available on the commercial stations. It is appropriate that Parliament should take this opportunity to provide that direction. (4 May 1983)

The Charter provides that direction and, as a result, the ABC's distinctive characteristics produce a range of services quantitatively and qualitatively different to the output of other parts of the broadcasting industry. The commercial, subscription and community sectors also produce different output driven by their own imperatives, both legislative and applied.

Collectively, the industry provides services to the Australian community that would not emerge from a broadcasting environment where all the participants operated according to the same goals and interests.

This sectoral diversity acts to provide a wider range of content than might otherwise emerge. It serves the Australian public well.

Notwithstanding the importance of the national broadcasters' discrete legislation and charters, there are limited common elements of public policy that direct both the ABC and BSA licensed broadcasters. These are at a fundamental level but are "givens" in the Australian community.

In the second reading speech for the BSA, these were set out by the then Minister, Senator the Hon Bob Collins, as the underlying philosophy of the BSA-

¹⁰ Glenn Withers, *The Cultural Influence of Public Television: An Econometric Analysis in Ruth Towse(ed), Cultural Economics: The Arts, the Heritage and the Media, International Library of Critical Writings in Economics, Cheltenham: Edward Elgar, 1996*

¹¹ *The Online Dividend, Information paper presented to ABC Board March 1999*

[The Bill]...continues to recognise that broadcasting is integral to developing an Australian identity and cultural diversity. It is vital to the operation of a democratic society....

The ABC believes that these elements are at the heart of the regulatory environment that should underpin broadcasting. Diversity of views allows creativity, the exchange of ideas and free debate that supports our political system. Distinctively Australian content helps Australians to be aware of themselves and each other in the wider world.

2.3 ABC's Role in Broadcasting: The Connections

The ABC is an important, independent provider of diverse programming in Australia, and it is also closely linked to the Australian broadcasting and media production industries (see Attachment 5 for fuller discussion of ABC's links with industry).

ABC's links to industry involve the areas of programming, production and training.

The ABC has agreements with both Federal and State Government agencies for the production of programming, which may involve funding as well as broadcasting arrangements for the programming funded.

The ABC works closely with the independent production sector to develop and produce television programming, including drama, comedy and documentary programs either by commissioning the product or through co-production agreements.

The ABC works with Federal and State educational institutions to develop programming which is broadcast and/or appears on the ABC's website. The ABC also works closely with training institutions which involve training of staff in aspects of program development, production and presentation. The ABC has long been recognised within the media, broadcasting and independent film, television and multimedia production industries as a training ground. Many people now working in these industries were trained, or gained early experience at the ABC.

The ABC also actively participates in industry forums with commercial television and radio broadcasters, community broadcasters and subscription broadcasters on a range of transmission, production and policy issues. Most recently, ABC staff have been working closely with the television industry in coordinating the transition to digital television broadcasting.

There are also links to the wider non-broadcasting arts sector, referred to in Attachment 6. The various cultural institutions interact with the ABC, by way of exposure to the arts that the ABC provides to the public, and in actual production activity.

3. REGULATION OF COMPETITION IN THE BROADCASTING INDUSTRY

A number of questions raised in the Issues Paper relate to a central theme: the effectiveness of competition rules, both under general trade practice law and specific BSA requirements, in achieving broadcasting objectives under s.3 of the Act.

Some of those questions focus on outcomes: whether the current regulations on ownership and control are effective in promoting ‘plurality of opinion’ and ensuring diversity in news, current affairs and political commentary. Others ask about the impact of restrictions on entry into the industry and its structure (Issues Paper para 2.2).

A few questions focus on defining markets in the industry and the competitive relationships within the industry (Issues Paper para 2.3).

Finally, specific questions are raised about the current BSA control rules and their advantages and disadvantages, the likely impact of convergence on those rules and whether there is a continuing need for limits, including restrictions on foreign ownership under the BSA (Issues Paper para 2.4). There are also questions about whether the ABA is the appropriate body to handle control rules or whether and to what extent competition issues can or should be dealt with by the Australian Competition and Consumer Commission (ACCC).

3.1 Aim of Competition Policy/Control Rules

As stated earlier in this Submission, the ABC believes the most important objectives of the BSA control rules affect content: the diversity of news and information sources, of ideas, of viewpoints, of voices and outlooks, as well as creative aspects including humour, whimsy, satire, drama, etc.

The effectiveness of the control rules and, more generally, competition policy for the broadcasting sector must therefore be measured not against simply the number of media outlets or service types, but against the diversity of information, debates and ideas those media outlets bring to the public.

The ABC plays a critical role in providing sectoral balance in Australia’s media, as is widely recognised within the industry¹². It is also important, however, that diversity among other sectors of the media be maintained.

The ABC submits that regardless of the outcomes of this Inquiry, its contribution is central to the diversity, distinctiveness and comprehensiveness of the Australian media, culture and society. As a result, whatever the recommendations of this Inquiry the ABC must continue to be a significant component in the Australian media mix.

¹² News Corp Ltd submission to DOCITA Cross media ownership review, *Reforming Media Ownership Policy*, December 1996, chap The National Market

3.2 ABC and Competition Policy

The ABC makes an important contribution to diversity of programming in the broadcasting sector through its independent news service and its wide range of information, entertainment, educational and cultural programs, as previously discussed.

The ABC is not covered by control rules under the BSA. The ABC does, however, have important links with broadcasting and related industry, and will be affected by any changes to the competitive environment in which the industry operates.

The ABC's links with industry include its position as both a buyer and seller of quality television programs in the program market. Concentration of media ownership, if it occurs, has a potential impact on the ABC as both a buyer and seller in that market.

3.3 ABC as Program Purchaser

An increase in media outlets alone, such as subscription or online services, does not necessarily increase the diversity of ideas, opinions or programming formats if those outlets are controlled by the same or a few owners.

Indeed, with more media outlets to fill, and potentially more bidders for program material produced by fewer media controllers, the result may be a bidding war for quality television programs in which the ABC cannot compete. This would be particularly true when other bidders for programs can spread high program costs across several media outlets they control. This is even more true in the case of foreign media owners that control media outlets overseas, and can rebroadcast the same material in many jurisdictions, having different media outlets bear only a proportion of the programming costs.

Another impact of media concentration is the likelihood of exclusivity deals for program material which effectively lock out program purchasers not affiliated with the relevant owners of program production.

Finally, if media outlets are concentrated in fewer hands, there could be a rationalisation of news sources within that media group, reducing outlets for independent reporting and leaving fewer sources from which to purchase news and information.

3.4 ABC as Program Seller

The same problems confront the ABC as program producer in a concentrated media market.

There will be fewer potential purchasers of ABC programming in a market where the content of a possibly wide range of media outlets is determined by a very few program purchasers.

In both cases, the ABC's ability to contribute to the diversity of creativity, ideas and debate through its programming could be undermined if the regulatory mechanisms do not ensure diversity of media ownership.

3.5 BSA Control Rules and Diversity

The BSA control rules, particularly the cross media rules, have largely achieved what they were designed to do - restrict media and cross media ownership within defined sectors. While ownership of the press is concentrated in a few companies, commercial radio and television are controlled by other media companies.¹³

For services not covered by BSA control rules, however, there has been a concentration of media ownership.

The BSA control rules relaxed previous restrictions on both the number of commercial radio licences one person or company could control in a licence area, and more broadly, within Australia. The result, at least in commercial radio, has been a less diverse ownership pattern. Indeed, as a study by Collingwood shows, with the relaxation of control rules over commercial radio, while the number of commercial radio services has increased, the number of independent stations has halved (down from 64 in 1986 to 31 in 1996).¹⁴ In the same period, the number of licences owned by networks doubled (72 stations in 1986 and 145 in 1996) with the number of ownership networks dropping from six in 1986 to three dominant networks in 1996.¹⁵

Further, BSA control rules do not cover subscription television services and do not cover radio subscription services. For example, both News Corporation and PBL Limited have significant interests in a major pay television operator.¹⁶ Nor do BSA cross-media rules deal with control of new media such as online services controlled by current media conglomerates.

BSA control rules do not ensure diversity of content, even in situations of differing control.

Networking, combined with new communications technologies has resulted, in commercial radio at least, in more networked programming emanating from a single source. As a consequence there has been less local programming. The same trend is true for news programming, with a significant drop in the number of journalists employed and a rise in the use of news networked from one source. Again, a comparison of commercial radio services between 1986 and 1996 establishes this.

Live broadcasting controlled by an operator in a local station in commercial radio dropped from 81% of total broadcast hours in 1986 to 56% of total broadcast hours in 1996. The number of journalists employed by commercial radio stations also dropped, from 338 in 1986 to 208 in 1996, despite the overall rise in the number of commercial radio stations.¹⁷ And

¹³ For a recent, comprehensive list of the controllers of major Australian media, see *Communications Update*, Feb 1999, No. 151 pp 7-30.

¹⁴ Peter Collingwood, *Commercial Radio Since the Cross-Media Revolution*, Communications Law Centre Research Paper No. 2 of 1997, p 3 and 7.

¹⁵ *Ibid.*

¹⁶ *Communications Update*, Op Cit, p. 28,

¹⁷ Collingwood, op. cit, pages 24, 29 and 3.

Skyradio (using mainly 2UE and 3AW resources) supplies its news service to 89 out of 94 markets in Australian radio.¹⁸

3.6 ACCC as regulator

Since the Federal Court's decision in the Austereo¹⁹ case, the ACCC's role as general competition regulator of the broadcasting industry has been confirmed. The ACCC has dealt with restrictive trade issues to support competition and diversity of services or content in broadcasting - issues which could not be addressed under the BSA.

There are, however, limits on the extent to which competition law alone can be used to address media concentration.

As the ACCC argued in its Submission to the Cross-Media inquiry, there is a 'real possibility' that different media organisations will be considered as operating in different markets, and trade practice law 'will not necessarily restrict cross-media ownership, unless an acquisition of one media outlet substantially lessens competition in the market of another'.²⁰

Further, the ACCC raises the argument that acquisitions of one media outlet by another could reduce competition 'in the market for ideas'....

*...The media is not simply an industry producing a consumer good or service. Its broader influence on the ideas and information that permeate a society gives it a greater significance for the well-being of a democracy than any measurement of its economic influence can account for.*²¹

¹⁸ Collingwood, op cit, p. 27.

¹⁹ Austereo Limited v Trade Practices Commission (1993) ATPR Para 41-246.

²⁰ ACCC, Submission to the Cross-Media Review, November 1996, p. 16.

²¹ Ibid, p. 17.

4. RELATIONSHIP WITH OTHER REGULATORS

As has already been noted, the ABC is accountable to the Parliament. Its Act and Board ensure its independence. As a result the ABC has a wide range of external accountability mechanisms and procedures. It also operates within a detailed set of internal editorial guidelines and a comprehensive complaints handling process. Parliament, in this manner, has limited the ABC's accountability to the Australian Broadcasting Authority.

4.1 Australian Broadcasting Authority

The ABC's relationship with the ABA falls into three main areas -

- regulation of subscription broadcasting services and subscription or open narrowcasting services which do not form part of the national broadcasting service (currently the ABC does not operate such services),
- the registration of the ABC's Code of Practice and the investigation of complaints under that Code, and
- planning of the broadcasting services bands.

Section 13 of the BSA allows for subscription broadcasting services and subscription or open narrowcasting services to be specified by the Minister as part of the ABC national broadcasting service. Such services must adhere to the same ABC policies and guidelines, including the Code of Practice, to which other parts of the national service adhere.

Any comparable services run by the ABC, but not specified by the Minister, would be accountable to the ABA and must abide by the relevant industry codes registered with the ABA. The ABC does not currently operate any such services.

The ABC believes it appropriate for services forming part of the national broadcasting service to be subject to ABC Editorial Policies and Code of Practice (the Code is set out in Attachment 6) and for any other broadcasting services it may choose to operate to meet the relevant industry codes.

The ABC Board is required to develop codes of practice relating to programming matters and to notify those codes to the ABA (s.8(1)(e) of the ABC Act). The ABA registers the ABC Code in its register of industry codes. This recognises that members of the ABC Board are appointed in the public interest and confirms the ABC's independence. The Board consults the National Advisory Council (NAC) in the development of the Code. The NAC is the statutory body that advises the Board on programming matters.

Licensed broadcasters are required to develop codes on an industry basis, but the codes are reviewable by the ABA, and can be amended by Federal Parliament (s.128 BSA).

As for all broadcasters, the ABC deals with complaints in the first instance. Where dissatisfaction remains after the ABC has dealt with a complaint covered by the Code or the ABC failed to deal with a complaint within the statutory period of 60 days, the complainant may ask the ABA to investigate the complaint and report findings.

Where the ABA finds that a complaint against the ABC is justified, the ABA may give notice to the ABC recommending that it comply with its Code of Practice and take such other action as the ABA specifies, including broadcasting or otherwise publishing an apology or retraction. If the ABC fails to act on an ABA recommendation within 30 days in a way the ABA deems adequate, the ABA may give a written report to the Minister who must cause a copy of the report to be laid before both Houses of Parliament.

The ABC believes it appropriate that the regime respects the independent nature of the national broadcaster and its Board. The ABC is not subject to direction by the Minister (other than in the exceptional circumstances envisaged under s.78(6) of the ABC Act) and under this regime, is not subject to direction by the ABA. The sanction of a written report placed before the Parliament is a powerful one.

Section 5 of this Submission, covering digital developments and the digital conversion process, deals with planning of the broadcasting services bands.

4.2 Australian Communications Authority (ACA)

The ABC is one of Australia's larger users of spectrum outside the broadcast bands.

This use of spectrum includes outdoor broadcast vans for radio and television applications, studio to transmitter links, wireless microphones, general mobile communications, HF broadcasts, data traffic interconnections, national and international satellite connections, weather radar and aeronautical communications from helicopter, and sports sound/vision capture from the field. For broadcasters, access to spectrum for these supplementary uses is critical. Without such spectrum access it is impossible to carry out broadcasting activities.

These important supplementary applications are necessary for the ABC to meet its Charter, and hence to play its part in maintaining Australia's broadcasting mix. Thus, in order for the public broadcasters to continue to meet Charter requirements, it is important that they are not disadvantaged in gaining access to spectrum because of limited resources.

The ACA has responsibility for the planning and licensing of these radiocommunications applications.

- **The ACA and domestic regulation**

In general, the implementation of the Radiocommunications Act by the ACA has been broadly acceptable to the ABC. The ABC commented in some depth to a review of the Radiocommunications Act in March 1999.

The ACA serves dual functions, both regulatory and revenue generating. On the one hand, it has a responsibility to undertake licensing, control and enforcement. It is the monopoly provider of spectrum, and has ultimate responsibility for spectrum regulation and management.

On the other hand it is charged with the development of the spectrum as a commercial resource for exploitation by way of competitive spectrum auctions. It is an important direct

contributor to the Treasury, and, at present, the third largest revenue generator after the Tax and Customs portfolios.

It would be preferable that the industry regulator functions independently and separately from the revenue generating arm of the authority so that regulation could become what it should be - an operation free of the pressure to collect revenue and any potential distortion that could influence regulatory policy.

The ABC perceives a potential for a conflict between the ACA's regulatory and revenue goals.

Nominally the ACCC has a brief to watch over most industry sectors including the ACA. However, in the case of spectrum regulation the ABC believes that the ACCC does not have the technical or other resources to do this effectively.

Despite these reservations about potentially conflicting powers vested in one authority, they have been managed relatively well by the ACA to date. There is, however, no guarantee that this can be maintained in the future.

The ABC supports the concept of consultation in regulatory functions and is generally satisfied with the level of consultation. The ACA has managed the development of the Spectrum Plan (which covers the permitted uses of bands of spectrum across the entire spectrum under ACA administration) with diligence and substantial consultation.

- **ACA and the international position**

The ABC believes that the processes followed by the ACA, and previously by the Spectrum Management Authority, in developing Australia's international positions for meeting statutory requirements of the International Telecommunications Union, and for participation and preparations for the ITU World Radiocommunications Conferences determining spectrum allocations, have involved extensive and satisfactory consultations. In the ABC's opinion, the consultations have involved most significant interests and the structure is flexible and open. The ACA's present policy and practice in this regard ought to continue.

- **ACA and interference management**

The ACA has a responsibility to address interference between users. The system relies to a large degree on users acting to protect themselves in disputes, except where public safety is compromised, when the ACA plays a greater role.

Relying on users to manage interference problems is not always effective to resolve disputes and may result in a slower resolution and at greater expense than a pro-active regulator might achieve.

The Radiocommunications Act does provide for conciliation as an alternate dispute mechanism to acting through the regulator or direct user resolution. This has not been used much but the ABC believes having an additional option other than relying on the ACA or through legal action may be of value.

Where the ACA has involved itself, it can be commended for the good work it has done in the area of interference management and dispute resolution. The ABC believes that the problem lies in the lack of emphasis the ACA has given to pro-active interference planning.

The emphasis on treating spectrum as a marketable commodity has left the interference provisions as being mostly reactive and often attempting to fix the interference after it occurred. At least in those cases where interference is anticipated from a given new application, there is a need for stronger involvement of the ACA prior to the occurrence of interference and the Act needs to accommodate such situations as well. The present provisions of the Act too easily allow interference to occur, before it gets addressed. The ABC believes this is not an effective aspect of interference management provisions in the Act.

5. THE ABC, DIGITAL DEVELOPMENTS AND THE DIGITAL CONVERSION PROCESS

Digital technology conversion offers the ABC an opportunity to significantly enhance the value of its public broadcasting services for all Australians. It will provide the ABC with an opportunity better fulfil its Charter obligations on television.

The ABC is a diversified media enterprise. Increasingly the ABC will make its content available across a range of mediums, radio, television, online and datacasting. The ABC's continuing ability to meet its role in serving community needs is dependent upon it having access to new and emerging platforms.

The ABC's focus will be on the nature of content it produces rather than traditional demarcations between delivery mediums of radio or television. It is likely that audiences will identify the ABC by the nature and quality of content streams, and expect to be able to receive them across a range of outlets.

The ABC regards the introduction of digital broadcasting as an important opportunity for testing new ideas and formats. Innovation must be given a high priority and regulation should not impede the development of new digital services. For that reason ABC has urged that limitations on should be minimal to allow the greatest flexibility and innovation.

5.1 Digital broadcasting

The introduction of digital terrestrial television broadcasting services, from 2001, will mark the beginning of another watershed in the development of media services in Australia. As a result the audience experience of television will be enhanced by High Definition Television (HDTV), multi-channel program streams in Standard Definition Television (SDTV) and narrow bandwidth streams of text, audio, video, graphics and animation (datacasting).

Technology convergence is blurring the traditional distinctions between media forms. No longer does the ABC capture 'vision' only for use on its television network, it is already being made available in the online web sites, and will in future be used for datacasting. Increasingly the Corporation will make digitised content, including sound, full motion video, stills, graphics, animation and text, available for traditional and non-traditional delivery. These include full bandwidth television services but, potentially, variable bandwidth streams particular purposes, internet-based delivery and datacasting through the broadcast spectrum.

In Europe, digital radio receivers range from simple devices capable of receiving audio and limited amounts of data through to receivers equipped with a screen, providing mobile access to visual information such as still photographs and graphics.

It will be some time before new patterns of industry segmentation and audience preference become clear as people select the combination of branded products and community services of most value to them. Significant factors likely to influence future segmentation include the relevance of content, lifestyle issues, convenience and flexibility, and perceptions of quality.

The ABC's primary focus is on the nature of content provided to meet the demands of the Charter rather than traditional demarcations between 'radio' and 'television' delivery. It is likely that future audiences will identify the ABC by the nature and quality of content streams rather than by the technology platforms (media outlets) used to receive them.

The ABC is a diversified media enterprise which, increasingly, will create digital content and provide it across radio, television, online and newly emerging platforms like datacasting. The ABC's continuing ability to meet its role in serving community needs is dependent upon it having access to new and emerging platforms.

The single most important change, affecting the ABC and other broadcasters, is the inevitable trend to a more interactive relationship between the broadcaster/program provider and the audience - one that will be more demand-driven and responsive in nature. This is not to suggest that in the longer term broadcasting 'networks', as we have known them, will disappear. It is certain however that content will need to be available in forms and at times of most convenience to the lifestyles and needs of users. It is also likely that individuals will be more actively involved in selecting content to suit their needs.

5.2 Potential of Digital Technology

Digital technology conversion offers the potential for the ABC to significantly enhance the value of its public broadcasting services in ways which may further express the distinctive role it has in connecting Australians with one another.

For the first time in many years, the ABC has an opportunity to overcome some of the constraints it has experienced in fulfilling its Charter obligations throughout the nation.

Compact, relatively low cost digital production technology - including cameras, graphics and editing equipment - may be deployed more widely outside capital city locations.

The fact that content - sound, vision, text and graphics - will increasingly be captured and stored in a common digital format means it can be available more readily for multiple applications. These digital applications will enable the ABC to extend the value of its creative resources in providing distinctive Australian content to counterbalance the increasing flow of foreign (especially American) material.

Digital transmission standards will enable the ABC to break out of its single national television network to more flexibly offer State-based programs and multiple streams of distinctive content including education.

The maturation of new media forms like the internet and datacasting invite an expanded range of opportunities for the ABC to work in association with other content providers and other sectors of the knowledge economy.

The Corporation is developing a path for its migration into the digital era as a cross-media content provider Australia-wide and internationally. It is addressing the transition to the digital future as effectively as it can notwithstanding the impact of funding cuts and the continuing

uncertainty as to the total level of Commonwealth Government assistance that will be made available for capital expenditure on digital technology.

5.3 The Digital Conversion process

In this section, because of the nature of the subject matter, ABC has specifically addressed the questions from the Commission's Issues Paper which it feels are relevant to the ABC-

- **What are the advantages and disadvantages of requiring conversion to digital transmission technology according to the schedule prescribed from 1 January 2001. Is this timetable achievable or realistic?**

Digital technologies are well established within broadcasting for production, storage and transmission of images between broadcasters. They are also used for almost all satellite delivery of television today and in many new cable systems. The terrestrial delivery of signals to the general public is virtually the last link in the chain that constrains what and how the television system can grow to compete with alternative delivery systems. The terrestrial television system must grow to meet audience expectations that are changing as a result of exposure to digital technologies through digital video disk, digital delivery by other systems, and the demands of larger displays in the home and office.

The present analogue television technology has its roots in the technology of the 1930s and every enhancement made to date has retained backwards compatibility with this technology. Those enhancements have principally been the addition of colour, stereo sound, captioning and teletext. The possibilities of further enhancing the system have effectively been exhausted. Digital technology on the other hand opens up a vista of potential improvements. It provides the platform for television to further develop over the next 20-30 years, it is far more spectrum efficient, it opens up totally new possibilities through the convergence of media delivery technologies, interactivity, and high quality mobile reception of television or associated data broadcast.

Spectrum efficiency is achieved in two ways. First, the use of digital techniques allows the carriage of images approaching cinema quality (equivalent to at least 35mm film) within the space currently occupied by a single analogue television service. This is particularly desirable for use with the generation of large screen display technologies (flat panel and projectors) now becoming more affordable and able to convey the cinema experience. The same delivery technology can be used to carry within that space, as an alternative, several television services. These can be delivered in a wide screen format having an aspect ratio of 16:9 (much the same as the cinema) compared with the current 4:3 television aspect ratio. The wide screen format has been demonstrated to have significant consumer appeal and further enhances the viewing experience.

Second, in addition to being able to carry higher quality or additional services in the same spectrum space used by a current television service, there is also scope for television services to be spaced more closely together than they can be for the old analogue technologies. This opens up the prospect of either more services or for more spectrum to eventually be made available for other uses if it is not required for television broadcasting.

Digital technologies also assist in reducing the impact of transmission impairments such as reflections of buildings and hills. These reflections arrive at the receiver later than the direct signal and are seen on the receiver as a ghost image. In severe cases they can make the service unwatchable. Many viewers in cities with a topography like Sydney or Brisbane suffer from this problem and the shortage of suitable channels and costs make it impossible to resolve the problem for analogue services. The digital transmission system is able to distinguish between the main and reflected signals and in moderate and sometimes severe cases is able to completely eliminate this annoying signal deficiency. The higher spectrum efficiency also allows new techniques to be used to reinforce weak signals in pockets of poor reception without running into the problem of insufficient channels.

In short, digital transmission offers a multitude of advantages to consumers and broadcasters and positions us to respond to the changing demands of the audience both in terms of program content and quality.

From the ABC's perspective, the possibility of multiple program transmission using a single transmission infrastructure (at times of the day when HDTV is not required) will enable the ABC to better address diverse audience needs, offering, for instance, special programming (eg children's) of interest to only a small (though important) part of the audience alongside other programming strands.

The change to digital will require substantial new capital investment by broadcasters. However, whether or not digital transmission to the public were introduced, most broadcasters, and the ABC in particular, are overdue to replace aging studio and production hardware and the replacements will be digital because analogue equipment has generally been replaced in the manufactures' catalogues by digital equipment. The new impost is for an entirely separate digital transmission network to be established to deliver the programs to the public. A new and separate network of transmitters is needed so that the existing analogue services can remain in simulcast mode to facilitate a progressive conversion to digital by the general public.

From the broadcaster's cost perspective, the simulcast should be as short as possible and every encouragement needs to be given to the audience to switch to this new technology. However, broadcasters do not wish to lose their audience in the transition, and the impact on the general public of a change of this magnitude cannot be underestimated.

Experience with simple changes, like a move from VHF to UHF of analogue television services, has demonstrated that the public is very vocal and politically active in response to changes to their television services in Australia. The experience overseas has been similar and in those countries which have introduced a radical system change in the past (the UK and France) political and audience pressures have kept the old system in place for 20-30 years. The current legislation envisages a minimum period of 8 years simulcast but this will be subject to further consideration before a termination date is set. This period is consistent with the nominal 10 year period being discussed or legislated overseas.

The disadvantages of the transition to digital are clearly the cost to broadcasters and the cost to the general public which must update their receivers. In the ABC's opinion, however, the changes are necessary and inevitable and in the long run are more than offset by the benefits, which also include the multiplier effect this will have on other sectors of the economy such as

the consumer products industry, and content production if those industries are sufficiently proactive.

While the 2001 timetable is demanding, it is achievable for capital cities provided the changes to the transmission towers and associated infrastructure are not delayed by factors outside of the control of the Broadcasters and tower owners (eg delays in building permit approvals etc). The transmission facilities are critical to the success of the venture because this infrastructure will remain for many years to come. The system is designed to make use of existing towers and antennas within practical limits of frequency planning and the physical and electrical constraints of the present facilities. The digital transmission system also requires lower radiated power to achieve the same coverage and as a consequence the changes will have a far lower environmental impact than for example the switch from analogue to digital telephone systems.

2001 is the commencement date, not necessarily the date for comprehensive and equivalent digital coverage of the analogue service. This may be achieved in some places where there are not too many additional transmitters providing the coverage. In most cities, the analogue coverage is provided by a main transmitter and a number of small relay transmitters. The digital equivalents of each of these relays must also be provided before full equivalence can be achieved. It remains important for the broadcasters to establish a digital signal quickly because until digital services are available few retailers will stock receivers, and even fewer viewers will purchase them.

The advantage of announcing a set starting date is that manufacturers, retailers, and consumers all have a clear unambiguous date by which they know services will be available. This has been done in all places where digital services have commenced and there has been a clear positive impact on consumer take-up of the technology.

- **What are the costs and benefits of simulcasting analogue and digital signals for eight years? Are there efficient alternative measures that could be adopted to ensure that households continue to receive television broadcasts on their existing sets.**

The question of costs and benefits have been addressed above. The costs are impossible to quantify at this stage because they will grow progressively and we are still in the midst of discovering what work is needed at each of the 600 odd sites the ABC uses across Australia to deliver digital.

Because the move to digital involves an entirely different method of transmission, it needs different reception hardware. It is possible to use a set-top box to receive the digital signal and to convert it to a standard analogue signal to be seen on an existing receiver but this arrangement effectively loses the benefits of wide screen and HDTV. The proposed eight year period will allow consumers time to assess the value of upgrading to a new receiver or to choose to replace their analogue set with a new digital receiver. The full benefits of digital cannot be achieved until the analogue services cease. The simulcast is a necessary cost, akin to the move from leaded to unleaded petrol.

- **Are you aware of any studies in Australia, or elsewhere, of consumer demand for digital television and HDTV, in particular?**

The ABC is aware of several studies conducted in the USA, but most of those were before HDTV started. There may now be others post introduction of digital TV in the USA and there is no substantial consumer experience of HDTV elsewhere in the world. The Advanced Television Standard Committee (ATSC), which has set the digital TV standard in the USA, cited university studies conducted in conjunction with consumer demonstrations of HDTV which found that consumer acceptance of this technology rated higher than any other consumer product similarly tested. We do not have specific references to this.

We are also aware of some studies conducted by members of the big accounting firms and some consulting companies but these are proprietary and the ABC has not sought them out. From examination of the previews and discussion with the consultants offering these studies, they are very Eurocentric and are based on a collection of opinions of various stakeholders rather than consumers. Consumer product manufacturers are very guarded on their own research as the results are of considerable commercial significance to them.

It must be remembered that introduction of digital television services is in an early phase throughout the world. The applicability of studies in other countries may be of limited value given a number of differences between the Australian and overseas environments. Australia is adopting a mixed HDTV/multichannel model, unlike Europe where HDTV is not being adopted. The USA model will not mandate HDTV levels in the start up phase.

Our population numbers, the geographical distribution of population and Australians' willingness to adopt new technologies do not have obvious international parallels.

- **How readily available are digital television sets likely to be, and at what prices? What is the expected time frame for households to acquire digital television sets?**

The broadcasting industry has been assured by all the major manufacturers that digital receivers will be available by the time of launch of digital television. This is expected to be a limited range of large screen receivers and perhaps some basic set-top converters in the first instance. The product range will expand after that. This has been the case in the USA where receivers now becoming available range from high end large HDTV capable receivers down to smaller portable sets.

All of these sets, can display a picture irrespective of the source being HDTV or SDTV. This will also be the case in Australia. For those sets able to display at standard definition only, the HDTV signal is converted in the receiver to match the display. This makes it possible to produce compact small screen low cost portable receivers for which the viewer would be unable to discern much difference in the image between HDTV and SDTV because of the small screen size.

The Government has also consulted widely with manufacturers through the Industry Action Agenda and so is no doubt better informed on this topic than individual broadcasters. The question is really one for the manufacturers. The broadcasters have the necessary assurances

and there is no evidence to the contrary coming from the current combined efforts of broadcasters and the industry in finalising the standard that the goal will be unachievable.

The lack of adequate consumer information makes any guess about consumer acceptance highly speculative at this point. Few consumers have seen these products and hence we cannot properly judge their reaction in the market place. Their choices will be governed as much or more by the content available on digital than by the technology. The broadcaster's obligation to simulcast analogue and digital makes it more difficult to offer a wide range of unique compelling digital-only content to entice viewers. Apart from the prospect of multi-channelling by national broadcasters and some other enhancements by way of multiview and other permitted "enhanced services", the only weapon in the arsenal is image and sound quality, in particular HDTV. It remains to be seen if this is sufficient to encourage rapid take-up.

- **What sort of services are Australian households likely to demand?**

At this stage, this is a matter of considerable uncertainty and many views. There is a great deal of speculation amongst service providers but no empirical evidence about what consumers want and whether initial enthusiasm for some of the options will endure. The fact that other countries are moving to digital television at about the same time as Australia means little or no empirical evidence is available, that is readily applicable to our domestic market.

The ABC has publicly expressed the view in its submissions to the reviews under the digital conversion legislation, that the early stages of digital television will be a testing ground for new ideas and formats. Innovation must be given a high priority and regulation should not impede the development of new digital services. For that reason ABC has urged that limitations on multichannelling, HDTV quotas and the like should be minimal to allow the greatest flexibility and innovation.

- **ABA Planning Process**

In the ABC's view, the ABA's dealings with the digital process have essentially been as efficient and consultative as could be achieved within the very tight timetable.

The ABC has been treated equally with other broadcasters under the legislation for provision of channels and the ABC has had a significant voice in all of the ABC and industry processes.

The ABC's contribution and participation has not been inhibited by the legislation or the ABA processes so far. At present, the ABC is awaiting finalisation of the National Conversion Scheme.

The administration and compliance costs will depend on the final arrangements that are set in place so the ABC cannot express any view as to the ultimate outcome.

6. INTERNATIONAL OBLIGATIONS

The broadcasting industry was once considered a national activity. Increasingly it is affected by the globalisation that is also impacting other sectors of the economy. Whatever regulatory amendments are made in Australia will be tested in international forums. The role of national public broadcasting will arguably become more important in a global media environment characterised by a plethora of choice.

6.1 GATS

- **Principles of GATS**

The General Agreement on Trade in Services (GATS) operates using two broad principles:

Market Access and National Treatment

Each World Trade Organisation (WTO) member country must open its domestic market to services suppliers from other member countries (Market Access), and must treat service suppliers from those other countries in the same way it treats its domestic suppliers (National Treatment).

This approach must be taken by a WTO member country in respect of all services falling within the categories that it lists in its 'schedule of commitments' - to the extent to which limitations are not otherwise correspondingly specified in the schedule.

Most Favoured Nations Obligation

The Most Favoured Nations (MFN) obligation calls for the most favourable treatment that is afforded by a WTO country to a supplier of a service from any other WTO country to be similarly afforded to suppliers of that service from other WTO countries, and in general to all service sectors irrespective of the content of the country's Schedule of Commitments.

However particular measures that are inconsistent with the MFN obligation can be maintained by a country, in principle for not more than 10 years, where they have been specified in the country's list of MFN Exemptions. Economic integration (ie 'Free Trade') agreements can be excluded from the MFN obligation, without being specified, provided they meet certain criteria.

- **Issues arising from GATS**

The GATS 2000 round is to include negotiations on audiovisual services, and in particular their further liberalisation, which could have consequences for a range of audiovisual policy measures including:

- transmission or production quotas for domestically produced materials, materials fulfilling certain cultural criteria (eg. indigenous language), or possibly programming criteria (eg. children's);
- levies, taxes, subsidies and other support measures for domestic productions and co-productions, or categories of productions (eg. indigenous language or children's programs);
- rules on access to distribution infrastructure systems (eg. frequencies, cable networks and associated conditions, such as 'must carry') and preferential access provisions;
- limits on foreign ownership;
- licensing policies; and
- transmission impositions (eg. official announcements or airtime for political parties).

- **Observations**

In the ABC's opinion, it is possible, but quite unlikely, that audiovisual services will continue as an area which can be excluded in whole from the application of GATS (by a country not including them in its Schedule of Commitments and listing appropriate measures in its list of MFN Exemptions).

However the membership of the WTO is such that it is even more unlikely that the GATS 2000 round will result in a total liberalisation of the supply of audiovisual services. While such an approach may be favoured by for example the USA, it is perceived that others (for example the European Union) would favour the retention of a WTO member's ability to sanction audiovisual policy measures, especially those directed at cultural imperatives.

No doubt, in the longer term, any such liberalisation may impact on the nature of measures open to Australia to maintain aspects of regulation it has pursued to date. This liberalisation may also impact on other areas of Australian cultural endeavour. The ABC's links to the wider arts industry may be affected if their support is hindered in this process.

6.2 TRIPS

- **Principles of TRIPS**

The Agreement on Trade-Related Aspects of Intellectual Property (TRIPS) similarly incorporates Most Favoured Nations Treatment and National Treatment principles, subject to a broader range of exceptions. In relation to copyright, TRIPS requires WTO Members to in essence comply with many of the substantive provisions (those that cover what a country's domestic legislation must achieve) of the Berne and Rome Conventions.

Berne Convention

Berne relates to works (literary, dramatic, musical and artistic) and films. TRIPS specifically excludes its adoption of Berne's moral right provisions. TRIPS requires computer programs and databases to be treated as literary works for Berne purposes, and introduction of lending rights in respect of films (unless their rental has not led to their widespread copying) and

computer programs (other than where the program itself is not the essential object of the rental).

Rome Convention

Rome relates to sound recordings, performers and broadcast transmissions. Unlike its approach with Berne, TRIPS does not adopt Rome's substantive provisions in total but instead mirrors many, but not all, of the rights guaranteed by Rome. For example Rome provides a right for performers/record producers to gain equitable remuneration for the broadcast of their commercially published sound recordings where TRIPS does not.

Both Berne and Rome contain a range of possible exemptions and areas of flexibility. These are specifically adopted by TRIPS.

It is not feasible to address issues which may result from the revision of TRIPS without direct consideration to particular issues. There are simply too many possibilities that might arise to canvass them here.

- **Observations**

The ABC can make some general observations about copyright. The effect of copyright protection of material, and specifically the incidence of rights covering the broadcast of that material, for a broadcaster is simply that it must pay for using that material. However there are two primary issues which may arise for broadcasters, to greater or lesser extent, from proposals to revise TRIPS or the underlying Conventions:

Access to materials (and on reasonable terms)

The copyright laws of many countries (such as Australia) include compulsory licence provisions, the purpose of which is to guarantee certain critical users access to various materials. These operate such that, for example, a broadcaster is entitled to a licence to broadcast musical works on terms that are negotiated with the relevant copyright owner/s or, failing agreement, set by independent arbitration.

There appears to be some movement internationally away from the use of statutory licences, or rather the exemptions in the relevant treaties and conventions which allow their application. Such a trend may have an impact if copyright owners become concentrated in vertically integrated conglomerates, as this may impact on the accessibility at a fair price of copyright material.

(Moral) Right of Attribution

Australia is itself deliberating the introduction of this right for the 'authors' of works and films, though generally it seems to be recognised that broadcasters have practical limits on the extent to which credits can reasonably be provided. However such problems would be magnified were a moral right of attribution to be extended to cover performance.

Section 6 of the ABC Act

- 6 (1) The functions of the Corporation are -
- (a) to provide within Australia innovative and comprehensive broadcasting services of a high standard as part of the Australian broadcasting system consisting of national, commercial and community sectors and, without limiting the generality of the foregoing, to provide -
 - (i) broadcasting programs that contribute to a sense of national identity and inform and entertain and reflect the cultural diversity of, the Australian community; and
 - (ii) broadcasting programs of an educational nature;
 - (b) to transmit to countries outside Australia broadcasting programs of news, current affairs, entertainment and cultural enrichment that will -
 - (i) encourage awareness of Australia and an international understanding of Australian attitudes on world affairs; and
 - (ii) enable Australian citizens living or travelling outside Australia to obtain information about Australian affairs and Australian attitudes on world affairs; and
 - (c) to encourage and promote the musical, dramatic and other performing arts in Australia.
- (2) In the provision by the Corporation of its broadcasting services within Australia -
- (a) the Corporation shall take account of -
 - (i) the broadcasting services provided by the commercial and community sectors of the Australian broadcasting system;
 - (ii) the standards from time to time determined by the Australian Broadcasting Authority in respect of broadcasting services;
 - (iii) the responsibility of the Corporation as the provider of an independent national broadcasting service to provide a balance between broadcasting programs of wide appeal and specialised broadcasting programs;
 - (iv) the multicultural character of the Australian community; and

- (v) in connection with the provision of broadcasting programs of an educational nature - the responsibilities of the States in relation to education; and
- (b) the Corporation shall take all such measures, being measures consistent with the obligations of the Corporation under paragraph (a), as, in the opinion of the Board, will be conducive to the full development by the Corporation of suitable broadcasting programs.
- (3) The functions of the Corporation under sub-section (1) and the duties imposed on the Corporation under sub-section (2) constitute the Charter of the Corporation.
- (4) Nothing in this section shall be taken to impose on the Corporation a duty that is enforceable by proceedings in a court.

Local and Regional Services

Local and Regional Services embodies the ABC's commitment to localism and to providing services which respond to the needs of the diverse regional and rural audiences in each state and territory throughout Australia.

Local Radio in 9 metropolitan areas and 48 regional locations (40 stations and 8 outposts) across Australia. Programming is a mix of news, information specialist rural and sport information and entertainment relevant to local audiences.

Local Television - programs produced by each state (predominantly those outside the main production centres of NSW and Victoria) for state wide transmission or sometimes national transmission

Regional Online - information on metropolitan and some regional station schedules, etc.; Formerly through The Bush Telegraph, now incorporated into ABC Rural Online, a daily rural news service compiled from the ABC's National Rural News broadcast on The Country Hour. The site also includes program summaries for The Country Hour, Countrywide and Rural Reporter, rural online fora and links to other rural information on the Web.

Local and Regional Services' commitment to Indigenous broadcasting is demonstrated in three areas: Indigenous programming, supporting Indigenous Media Associations and communities, and employing and developing Indigenous staff. The portfolio also includes ABC Marketing, a single unit of marketing and audience research resources with the responsibility to position and promote ABC services at the local, State/Territory and national levels along with the ABC's Olympics Broadcast Operations Unit, responsible for coordinating the ABC's involvement in the Sydney 2000 Games.

National Networks

National Networks seeks to satisfy diverse national and international audience needs through the delivery of comprehensive, distinctive programming across television, radio and online media.

Network Television - commissions, purchases, schedules and presents programs for the single national television network, which splits for state and territory news and sports programs and from time to time programs produced in Brisbane, Adelaide, Perth, Hobart and Darwin.

Radio National - a national radio network focusing on national and international news and information and providing specialist programs on health, law, science, religion, arts, business, education using a range of radio forms including documentaries, features, drama and specialist music programming.

ABC Classic FM - a national classical music network which does a significant amount of live-music recording and also broadcasts a wide range of new music, jazz and performance.

NewsRadio on the Parliamentary and News Network - a network to all capital cities and Newcastle, broadcasting the proceedings of Federal Parliament, and at other times providing 24 hour continuous news, current affairs and sport , incorporating material from Australia-wide newsgathering teams. NewsRadio is now streamed online, available to all Australians with internet access outside capital cities.

Triple J - a national youth network broadcasting music, information and news to young Australians. The network has a particular emphasis on Australian music and the recording of new artists; it aims to reflect and contribute in innovative and accessible ways to a sense of national identity.

Radio Australia - Australia's respected voice into Asia and the Pacific in English, Tok Pisin, Indonesian, Chinese, Khmer and Vietnamese; shortwave transmission to the Pacific is from Shepparton (Vic.) and to PNG from Brandon (Qld.). Rebroadcast agreements have been negotiated in several countries. Radio Australia is now available in audio online and hosts a multilingual online world news and information site.

ABC Multimedia - this unit manages the ABC Online Network which is Australia's premier media site. It features the continually updated, state, regional, national and international Online News service, The Lab, Explore your Interests and scores of program or network sites; special election sites are developed for state and federal elections.

Program Production

Program Production is a production house to create and produce commissioned programs, other than News and Current Affairs, to satisfy broadcast schedules.

The portfolio has two main components -

- a production arm with responsibility for production of drama, comedy, education, science, sport (events), arts, entertainment, music, youth, children's, documentaries, specials, religion, business, natural history and indigenous programs, and
- a production resources arm responsible for resources in Sydney and Melbourne, including production operations, production services, production facilities, technical services, research services and library services. In addition, the portfolio's transmission resource services provide master control operations for production and transmission of ABC Television in NSW.

News and Current Affairs

News and Current Affairs gathers, analyses, packages and presents all News and Current Affairs programs for National Networks and Regional Services to meet audience needs across the country. News and Current Affairs feeds television, five radio networks and a rapidly expanding online news site.

News and Current Affairs employs journalists and other editorial staff in 56 locations in Australia, and the foreign correspondents operating from the fourteen overseas bureaux in Amman, Bangkok, Beijing, Brussels, Jakarta, Jerusalem, Johannesburg, London, Moscow, New Delhi, New York, Port Moresby, Tokyo and Washington. It is responsible for relevant

resources and production resource staff such as field camera crews, editors, directors, news graphics staff and some studio crews.

ABC Enterprises

ABC Enterprises extends the life of ABC programs by licensing or producing, marketing and retailing quality consumer products which relate to ABC programming and services. These activities assist in fostering and developing Australian talent and creativity and make a valuable financial contribution to the Corporation.

Over 560 products related to ABC programming activities were released in 1996-97. There are 28 ABC shops and approximately 100 ABC centres.

Activity divisions of ABC Enterprises include retail, book publishing, audio tapes, videos, contemporary music recording, music publishing, classical music recording, magazine publishing, new media (CD-ROMS), licensing, the 'ABC for Kids' label, sales and distribution and mail order.

Subsidiaries - the Symphony Orchestras

A network of six symphony orchestras, most of which have been (and the remainder will be) incorporated as wholly owned subsidiaries of the ABC, are coordinated by another subsidiary, Symphony Australia. This arrangement provides the orchestras with significant independence while retaining continuing relationships with the ABC and a strong identity as an orchestral network.

The orchestras make a significant contribution to the cultural life of Australia, not only through concerts, but also through broadcasts including simulcasts on ABC Classic FM and ABC Television, and recordings - many of them on the ABC Classics label, a division of ABC Enterprises. The orchestras maintain active development programs to encourage young Australian instrumentalists, vocalists and conductors and provide opportunities for Australian composers.

Section 1 Excerpts from ABC 1999 Performance Study (prepared by ABC Audience Research Department March 1999)

1 Introduction

This research was commissioned in December 1998 to establish the public's opinion of the performance of the ABC.

The methodology used was a series of questions placed on the Newspoll 'omnibus' telephone survey of 14-17 December 1998 with a national sample of 1 290 individuals aged 14 and above. Respondents are nationally representative of the population of Australia in age, gender and State of residence.

2 Quality of commercial television and ABC television

- The overall quality of programming on ABC television is considered significantly better than that on commercial networks. A total of 75.1% of the population rated the quality of programming on ABC television as "good" compared with only 40.9% rating the quality of commercial television as "good".
- Of more significance is the percentage of people who rated the quality of commercial television as poor, with 52.6% rating this, compared with only 12.1% of the population who rated the quality of the ABC's programming as poor. More people rated the quality of commercial television as "poor" than "good".

Question 7a: Thinking now about commercial television. By that we mean television stations with advertising, and pay television if you have it, but not the ABC. Based on your own experience, or what you may have seen or heard, overall do you think the quality of programming on commercial television is good or poor?

Question 7b: Thinking now about ABC television. Based on your own experience, or what you may have seen or heard, overall do you think the quality of programming on ABC television is good or poor?

| | All respondents | | Excluding "Neither/Don't Know" Responses | |
|---------------------------|-----------------------|----------------|--|----------------|
| | Commercial Television | ABC Television | Commercial Television | ABC Television |
| | % | % | % | % |
| Very good | 4.1 | 19.9 | 4.4 | 22.8 |
| Quite good | 36.8 | 55.2 | 39.4 | 63.2 |
| Subtotal good | 40.9 | 75.1 | 43.7 | 86.0 |
| Quite poor | 33.9 | 9.7 | 36.3 | 11.1 |
| Very poor | 18.7 | 2.4 | 20.0 | 2.7 |
| Subtotal poor | 52.6 | 12.1 | 56.3 | 13.9 |
| Neither/don't know | 6.5 | 12.7 | - | - |

3 How good a job commercial television and ABC television does in providing shows respondents like to watch

- A total of 70.2% of respondents rated the ABC as doing a good job in providing shows they like to watch, compared with only 47.8% of the population who rated the commercial stations as doing a good job.
- Almost as many respondents thought the commercial stations were doing a poor job as a good job on this measure (47.2% for poor versus 47.8% for good). Only 16.7% of the population rated the ABC as doing a poor job in providing shows they personally like to watch.

Question 8a: And overall would you say commercial television does a good job, or a poor job, in terms of the number of shows it provides that you personally like to watch?

Question 8b: And overall would you say ABC television does a good job, or a poor job, in terms of the number of shows it provides that you personally like to watch?

| | Commercial Television | ABC Television |
|---------------------------|------------------------------|-----------------------|
| | % | % |
| Very good job | 9.2 | 17.6 |
| Quite good job | 38.6 | 52.6 |
| Subtotal good | 47.8 | 70.2 |
| Quite poor job | 29.8 | 12.1 |
| Very poor job | 17.4 | 4.7 |
| Subtotal poor | 47.2 | 16.7 |
| Neither/don't know | 5.0 | 13.1 |

- If the “don’t know” respondents were excluded from the results for both the commercial and ABC television the results are more marked. Of those , 80.8% felt ABC was doing a good job in providing shows that they personally like to watch, while 50.3% felt the commercial stations were doing a good job.

| | Commercial Television | ABC Television |
|-----------------------|------------------------------|-----------------------|
| | % | % |
| Very good job | 9.7 | 20.3 |
| Quite good job | 40.6 | 60.5 |
| Subtotal good | 50.3 | 80.8 |
| Quite poor job | 31.4 | 13.9 |
| Very poor job | 18.3 | 5.4 |
| Subtotal poor | 49.7 | 19.2 |

4 The quality of programming on commercial radio and ABC radio

- The most significant difference in the populations perception of the quality of programming on commercial versus ABC radio is the proportion of the population who believe the stations are doing a poor job. A total of 28.7% of respondents rated the commercial radio stations as doing a poor job, while only 7% felt the ABC was doing a poor job.

Question 12a: Thinking now about commercial radio, by that we mean radio stations with advertising, but not ABC radio stations. Based on your own experience, or what you may have seen or heard, overall do you personally think the quality of programming on commercial radio is good or poor?

Question 12b: Thinking now about ABC radio. Based on your own experience, or what you may have seen or heard, overall do you personally think the quality of programming on ABC radio is good or poor?

| | Commercial Radio | ABC Radio Stations |
|---------------------------|-------------------------|---------------------------|
| | % | % |
| Very good | 12.4 | 17.4 |
| Quite good | 42.8 | 42.4 |
| Subtotal good | 55.2 | 59.8 |
| Quite poor | 16.7 | 5.7 |
| Very poor | 12.0 | 1.4 |
| Subtotal poor | 28.7 | 7.0 |
| Neither/don't know | 16.1 | 33.1 |

- When the results are calculated without those who declined to give an opinion the ABC radio stations are rated as good by a significantly greater number of respondents. The ABC stations are also rated as poor by a far smaller proportion of the population.

| | Commercial Radio | ABC Radio Stations |
|-----------------------------|-------------------------|---------------------------|
| | % | % |
| Very good | 14.8 | 26.0 |
| Quite good | 51.0 | 63.4 |
| <i>Subtotal good</i> | 65.8 | 89.4 |
| Quite poor | 19.9 | 8.5 |
| Very poor | 14.3 | 2.1 |
| <i>Subtotal poor</i> | 34.2 | 10.6 |

5 How good a job commercial radio and ABC radio does in the amount of programming provided that respondents like to listen to

- The commercial stations and ABC radio stations were regarded by an equal proportion of the population to do a good job in the amount of programming provided that respondents like to listen to. However the percentage of the population who regard the commercial stations as doing a poor job is far greater than those who think the ABC is doing a poor job (28.3% for commercial versus 10.3% for ABC).

*Question 13a: And overall would you say that commercial radio does a good job, or a poor job, in terms of the **amount** of programming it provides that you personally like to listen to?*

*Question 13b: And overall would you say that ABC radio does a good job, or a poor job, in terms of the **amount** of programming it provides that you personally like to listen to?*

| | Commercial Radio | ABC Radio Stations |
|---------------------------------|-------------------------|---------------------------|
| | % | % |
| Very good job | 13.1 | 15.8 |
| Quite good job | 42.6 | 40.8 |
| <i>Subtotal good job</i> | 55.7 | 56.6 |
| Quite poor job | 16.2 | 8.2 |
| Very poor job | 12.1 | 2.0 |
| <i>Subtotal poor job</i> | 28.3 | 10.3 |
| Neither/don't know | 16.1 | 33.2 |

- A total of 33.2% of respondents did not offer an opinion for ABC radio stations, probably reflecting their lack of exposure to the stations. If only the respondents who gave an opinion are included in the results the proportion of the population who regard the ABC stations as doing a good job is significantly greater than those who believe the commercial stations are doing a good job.

| | Commercial Radio | ABC Radio Stations |
|---------------------------------|-----------------------------|-------------------------------|
| | % | % |
| Very good job | 15.6 | 23.7 |
| Quite good job | 50.8 | 61.1 |
| <i>Subtotal good job</i> | 66.4 | 84.7 |
| Quite poor job | 19.3 | 12.3 |
| Very poor job | 14.4 | 3.0 |
| <i>Subtotal poor job</i> | 33.7 | 15.3 |

6 Quality of information on the ABC website

- Of the 115 respondents who had visited the ABC web site 91.5% thought the quality of information on the site was good, and no-one rated the quality as poor. The remaining 8.5% of respondents were non-committal in their opinion of the quality of the web site.

Question 15: Do you personally think the quality of information on the web site is good or poor? (n=115)

| | % of Population |
|-----------------------------|------------------------|
| Very good | 34.2 |
| Quite good | 57.4 |
| <i>Subtotal good</i> | 91.5 |
| Quite poor | 0 |
| Very poor | 0 |
| <i>Subtotal poor</i> | 0 |
| Neither/don't know | 8.5 |

7 The Value of the ABC and its Services to the Australian community

- When respondents were asked to rate the value of the ABC and its services to the Australian community 88.4% rated it as being valuable, 7.3% not valuable and 4.3% declined to comment.

By Gender and Capital City vs Non-Capital City

- Males were a little more likely than females to provide an opinion on this question, and were both more likely to agree that the ABC is valuable and that it is not valuable. A total of 5.9% of women did not offer an opinion, compared with 2.7% of men. There was little difference between responses from those living in capital cities and those in non-capital cities areas.

Question 16: Now thinking about the ABC overall, including ABC television, radio and the ABC web-site.

Overall, how would you rate the value of the ABC and its services to the Australian community? Would you say it is...

| | % of Pop. | Male | Female | 5 CAP | X-CITY |
|------------------------------|------------------|-------------|---------------|--------------|---------------|
| Sample Size | 1290 | 645 | 645 | 752 | 538 |
| Very valuable | 43.8 | 45.7 | 41.9 | 44.5 | 42.6 |
| Quite valuable | 44.6 | 43.7 | 45.5 | 43.6 | 46.3 |
| Subtotal valuable | 88.4 | 89.3 | 87.4 | 88.1 | 88.9 |
| Not very valuable | 5.1 | 5.7 | 4.5 | 4.2 | 6.6 |
| Not at all valuable | 2.2 | 2.2 | 2.1 | 2.6 | 1.5 |
| Subtotal not valuable | 7.3 | 8.0 | 6.6 | 6.8 | 8.1 |
| Neither/don't know | 4.3 | 2.7 | 5.9 | 5.2 | 3.0 |

8 How good a job the ABC is doing on specific measures

- Respondents were asked their opinion on how good a job the ABC was doing on a range of performance measures. More than 64% of the population thought the ABC was doing a good job on all performance measures, and less than 14% thought the ABC was doing a poor job on all measures.
- The measure that most respondents thought the ABC was doing a good job on was "broadcasting programs that are different from the sort of programs you would get on commercial television and commercial radio stations" with 86.6% of respondents agreeing the ABC does a good job of this.
- More than 80% of the population thought the ABC was doing a good job at "encouraging and promoting Australian performing arts such as music and drama", "having a good balance between broadcasting programs of a broad appeal and "broadcasting programs that appeal to people with special interests", and "broadcasting programs of an educational nature".

How good a job the ABC is doing on specific measures: Respondents who gave an opinion only.

- When the respondents who declined to give an opinion were excluded from the results, of those who gave an opinion more than 80% thought the ABC was doing a good job on all measures, and more than 90% thought the ABC was doing a good job on six of the nine qualities measured.

How good a job the ABC is doing on specific measures

Question 17: Now we'd like your opinion about other aspects of the ABC. Based on your own experience, or what you may have seen or heard, do you personally think the ABC is doing a good job or a poor job on each of the following?

| | Very Good | Quite Good | Sub-total good | Quite Poor | Very Poor | Sub-total poor | Neith'r /Don't know |
|--|------------------|-------------------|-----------------------|-------------------|------------------|-----------------------|----------------------------|
| | % | % | % | % | % | % | % |
| Broadcasting programs that are different from the sort of programs you would get on commercial television and commercial radio stations | 41.8 | 44.8 | 86.6 | 2.7 | 0.8 | 3.5 | 9.8 |
| Broadcasting programs of an educational nature | 43.3 | 41.8 | 85.0 | 2.7 | 0.5 | 3.2 | 11.8 |
| Encouraging and promoting Australian performing arts such as music and drama | 37.9 | 44.6 | 82.5 | 3.8 | 0.5 | 4.2 | 13.2 |
| Having a good balance between broadcasting programs of wide appeal, and broadcasting programs that appeal to people with special interests | 29.3 | 52.3 | 81.6 | 5.7 | 1.1 | 6.8 | 11.6 |
| Being distinctively Australian and contributing to Australia's national identity | 33.0 | 47.3 | 80.3 | 5.7 | 1.2 | 6.9 | 12.8 |
| Being balanced and even-handed when reporting news and current affairs | 26.6 | 51.2 | 77.8 | 7.1 | 2.9 | 10 | 12.2 |
| Broadcasting programs that reflect the cultural diversity of the Australian community | 26.2 | 50.8 | 77.0 | 6.2 | 1.0 | 7.2 | 15.8 |
| Being innovative - that is trying to do new things and different types of programs | 22.3 | 45.7 | 68.0 | 11.9 | 1.3 | 13.2 | 18.8 |
| Being efficient and well managed | 17.9 | 46.3 | 64.3 | 6.9 | 2.0 | 8.9 | 26.8 |

How good a job the ABC is doing on specific measures: Respondents who gave an opinion only.

| | Very Good | Quite Good | Sub-total good | Quite Poor | Very Poor | Sub-total poor |
|--|-----------|------------|----------------|------------|-----------|----------------|
| | % | % | % | % | % | % |
| Broadcasting programs of an educational nature | 49.1 | 47.4 | 96.4 | 3.1 | 0.6 | 3.6 |
| Broadcasting programs that are different from the sort of programs you would get on commercial television and commercial radio stations | 46.3 | 49.7 | 96.0 | 3.0 | 0.9 | 3.9 |
| Encouraging and promoting Australian performing arts such as music and drama | 43.7 | 51.4 | 95.0 | 4.4 | 0.6 | 4.8 |
| Having a good balance between broadcasting programs of wide appeal, and broadcasting programs that appeal to people with special interests | 33.1 | 59.2 | 92.3 | 6.4 | 1.2 | 7.7 |
| Being distinctively Australian and contributing to Australia's national identity | 37.8 | 54.2 | 92.1 | 6.5 | 1.4 | 7.9 |
| Broadcasting programs that reflect the cultural diversity of the Australian community | 31.1 | 60.3 | 91.4 | 7.4 | 1.2 | 8.6 |
| Being balanced and even-handed when reporting news and current affairs | 30.3 | 58.3 | 88.6 | 8.1 | 3.3 | 11.4 |
| Being efficient and well managed | 24.5 | 63.3 | 87.8 | 9.4 | 2.7 | 12.2 |
| Being innovative - that is trying to do new things and different types of programs | 27.5 | 56.3 | 83.7 | 14.7 | 1.6 | 16.3 |

Section 2 Summaries of other audience research

These 1998 results are consistent with research over a number of years.

- a 1990 ANOP survey finding that 86 percent of Australians (aged 15 years and over) used the ABC every week; that the ABC ‘was of genuine broad appeal to the community’; and that the ABC was attractive for its news and information, entertainment and music, non-commercial style and quality of programs.
- a January 1996 Taverner Research Company survey in which 85 percent of respondents believed the ABC to be a good influence on life in Australia. The ABC was more often said to be a good influence on life in Australia than any other of the fourteen institutions listed (except for ‘sports personalities’, who were equally well regarded).
- a June 1996 AGB McNair poll showed widespread public support for the ABC and opposition to funding cuts, even from those who did not use the ABC. Eighty-five percent of Australians surveyed agreed that ABC funding levels should be maintained or increased.
- a May 1997 Newspoll survey revealed opposition to funding cuts and concern over reductions to ABC programs and services. Of the 1200 surveyed adults, 73 percent were opposed to the \$55 million budget cut and 10 percent in favour.

Other recent research evidence for community support for the ABC includes:

- The 1997 Appreciation Survey, conducted by Media Scan, found that an estimated 85 percent of the population (aged 15-plus) watch ABC television and/or listen to ABC radio each week. All respondents (including non-ABC users) were asked about general attitudes to the ABC: 81 percent were in favour; 2 percent against; and 17 percent neutral.

- in the 1997 Appreciation Survey, respondents were asked how well they thought each of a number of media outlets was doing its jobs. Excluding those people who didn't have an opinion about each outlet, the percentage of people who thought each outlet was doing its job well was:

| | Very Well (%) | Total 'Very' and 'Reasonably' Well (%) |
|---------------------------|--------------------------|---|
| ABC radio | 51 | 94 |
| ABC television | 44 | 92 |
| SBS television | 39 | 87 |
| Commercial radio | 29 | 87 |
| Community or public radio | 27 | 85 |
| Daily newspapers | 23 | 77 |
| Commercial television | 17 | 74 |

- in a qualitative 'search conference' conducted by Elliot & Shanahan, both light and heavy ABC television and radio users conveyed enormously high regard for the ABC, which they perceived as offering quality, even excellence, most of the time.
- a 1995 survey conducted for ABC television by AGB McNair reiterated (for television) an ANOP finding that the ABC is considered distinctive. Eighty-three percent of adult respondents selected ABC television as the channel 'most unlike' the others and when asked to say which pair of channels was most alike, only three percent selected a pair including ABC television.
- similarly, the 1995 Radio Appreciation Survey conducted by MediaScan found that ninety percent of ABC radio listeners agreed that ABC radio sounds distinctly different from commercial radio and eighty percent agreed that ABC radio programs are generally of higher quality than commercial programs.

Notes:

1. Source data: AC Nielsen Pty Ltd.
2. Genre of programs is determined by broadcaster and recorded by AC Nielsen in its data when compiled. The period of data is from 28 December 1997 to 27 December 1998.
3. The cities listed are the 5 capital cities surveyed by AC Nielsen in its metropolitan "peplemeter" television audience survey
4. The analysis is broken down as by genre as a percentage of each network's total broadcast time (BT) for the data period.

| SYDNEY | ABC | NET: 7 | NET: 9 | NET: 10 | SBS |
|-----------------------|--------------|---------------|---------------|----------------|--------------|
| | % of BT | % of BT | % of BT | % of BT | % of BT |
| DOCUMENTARY | 11.3 | 1.5 | 3.0 | 0.5 | 11.6 |
| DRAMA: ONE OFF | 0.6 | - | - | - | 0.1 |
| GAMESHOW | 0.0 | 2.1 | 3.6 | 0.9 | - |
| INFORMATIVE | 11.1 | 3.0 | 3.5 | 11.6 | 15.3 |
| MINI SERIES | 0.0 | 1.5 | 0.3 | 0.1 | - |
| MOVIES | 2.0 | 14.4 | 8.8 | 6.8 | 14.3 |
| MUSIC | 7.2 | - | - | 4.8 | 0.8 |
| NEWS | 7.4 | 10.8 | 10.0 | 9.6 | 34.4 |
| COMEDY | 3.6 | 7.6 | 7.9 | 8.8 | 1.2 |
| CHILDRENS | 26.2 | 17.6 | 8.3 | 14.5 | 2.0 |
| AUSSIE DRAMA | 2.6 | 5.5 | 2.2 | 5.2 | 0.1 |
| CULTURAL | 3.4 | - | - | - | 0.3 |
| CURRENT AFFAIRS | 5.9 | 5.9 | 11.4 | 9.6 | 1.1 |
| RELIGIOUS | 0.7 | 0.6 | 0.6 | 0.4 | - |
| SPECIALS | 0.2 | 2.3 | 2.1 | 1.3 | 1.2 |
| SPORTS | 7.5 | 15.8 | 17.7 | 14.0 | 13.1 |
| VARIETY | 2.9 | 3.7 | 8.8 | 4.4 | 1.2 |
| OTHER SERIALS & DRAMA | 7.5 | 8.0 | 11.6 | 7.4 | 3.2 |
| TOTAL | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

| MELBOURNE | ABC | NET: 7 | NET: 9 | NET: 10 | SBS |
|-----------------------|--------------|---------------|---------------|----------------|--------------|
| | % of BT | % of BT | % of BT | % of BT | % of BT |
| DOCUMENTARY | 11.2 | 0.8 | 3.0 | 0.5 | 11.6 |
| DRAMA: ONE OFF | 0.6 | - | - | - | 0.1 |
| GAMESHOW | - | 2.1 | 3.7 | 0.9 | - |
| INFORMATIVE | 11.1 | 2.7 | 3.6 | 11.6 | 15.3 |
| MINI SERIES | - | 1.1 | 0.3 | 0.1 | - |
| MOVIES | 2.1 | 14.9 | 8.6 | 6.8 | 14.3 |
| MUSIC | 7.0 | - | - | 4.8 | 0.8 |
| NEWS | 7.4 | 11.0 | 9.9 | 9.6 | 34.4 |
| COMEDY | 3.6 | 7.6 | 7.9 | 8.8 | 1.2 |
| CHILDRENS | 26.2 | 17.9 | 8.4 | 14.5 | 2.0 |
| AUSSIE DRAMA | 2.6 | 5.5 | 2.2 | 5.2 | 0.1 |
| CULTURAL | 3.2 | - | - | - | 0.3 |
| CURRENT AFFAIRS | 5.9 | 6.0 | 11.4 | 9.6 | 1.1 |
| RELIGIOUS | 0.7 | 0.6 | 0.6 | 0.4 | - |
| SPECIALS | 0.2 | 2.7 | 2.2 | 1.3 | 1.3 |
| SPORTS | 7.7 | 17.3 | 16.2 | 14.0 | 13.1 |
| VARIETY | 2.9 | 3.7 | 9.0 | 4.4 | 1.2 |
| OTHER SERIALS & DRAMA | 7.5 | 6.2 | 12.9 | 7.4 | 3.2 |
| TOTAL | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Notes: see notes at beginning of Attachment

| BRISBANE | ABC | NET: 7 | NET: 9 | NET: 10 | SBS |
|-----------------------|----------------|----------------|----------------|----------------|----------------|
| | % of BT | % of BT | % of BT | % of BT | % of BT |
| DOCUMENTARY | 11.3 | 1.3 | 3.0 | 0.5 | 11.5 |
| DRAMA: ONE OFF | 0.6 | - | - | - | 0.1 |
| GAMESHOW | - | 2.1 | 3.7 | 0.9 | - |
| INFORMATIVE | 11.1 | 3.6 | 3.7 | 11.7 | 15.3 |
| MINI SERIES | - | 1.4 | 0.3 | 0.1 | - |
| MOVIES | 2.2 | 13.1 | 8.4 | 6.8 | 14.3 |
| MUSIC | 7.0 | - | - | 4.8 | 0.8 |
| NEWS | 7.4 | 10.6 | 11.7 | 9.6 | 34.4 |
| COMEDY | 3.6 | 7.4 | 6.6 | 8.8 | 1.2 |
| CHILDRENS | 26.2 | 17.5 | 8.2 | 14.5 | 2.0 |
| AUSSIE DRAMA | 2.6 | 5.5 | 2.2 | 5.2 | 0.1 |
| CULTURAL | 3.3 | - | - | - | 0.3 |
| CURRENT AFFAIRS | 5.9 | 5.9 | 11.4 | 9.6 | 1.1 |
| RELIGIOUS | 0.7 | 0.5 | 0.6 | 0.4 | - |
| SPECIALS | 0.2 | 2.8 | 2.1 | 1.3 | 1.2 |
| SPORTS | 7.6 | 16.5 | 17.8 | 14.0 | 13.2 |
| VARIETY | 2.9 | 3.6 | 8.7 | 4.4 | 1.2 |
| OTHER SERIALS & DRAMA | 7.5 | 8.1 | 11.6 | 7.4 | 3.2 |
| TOTAL | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Note: see notes at beginning of Attachment

| ADELAIDE | ABC | NET: 7 | NET: 9 | NET: 10 | SBS |
|-----------------------|----------------|----------------|----------------|----------------|----------------|
| | % of BT | % of BT | % of BT | % of BT | % of BT |
| DOCUMENTARY | 11.3 | 1.3 | 2.9 | 0.5 | 12.6 |
| DRAMA: ONE OFF | 0.6 | - | - | - | 0.1 |
| GAMESHOW | - | 2.1 | 3.7 | 0.9 | - |
| INFORMATIVE | 11.1 | 2.6 | 5.7 | 11.6 | 16.1 |
| MINI SERIES | - | 1.1 | 0.3 | 0.1 | - |
| MOVIES | 2.2 | 12.3 | 8.8 | 6.8 | 10.5 |
| MUSIC | 7.1 | - | 0.0 | 4.8 | 1.0 |
| NEWS | 7.5 | 9.0 | 6.8 | 9.6 | 34.3 |
| COMEDY | 3.6 | 7.0 | 7.9 | 8.8 | 1.3 |
| CHILDRENS | 26.2 | 17.6 | 8.6 | 14.5 | 2.1 |
| AUSSIE DRAMA | 2.6 | 5.5 | 2.4 | 5.2 | 0.1 |
| CULTURAL | 3.2 | - | - | - | 0.3 |
| CURRENT AFFAIRS | 5.9 | 5.7 | 11.4 | 9.6 | 1.1 |
| RELIGIOUS | 0.7 | 0.6 | 0.1 | 0.4 | - |
| SPECIALS | 0.2 | 2.2 | 2.5 | 1.3 | 1.3 |
| SPORTS | 7.7 | 19.3 | 16.0 | 14.1 | 14.1 |
| VARIETY | 2.8 | 7.2 | 10.5 | 4.4 | 1.5 |
| OTHER SERIALS & DRAMA | 7.5 | 6.5 | 12.5 | 7.4 | 3.5 |
| TOTAL | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Note: see notes at beginning of Attachment

| PERTH | ABC | NET: 7 | NET: 9 | NET: 10 | SBS |
|-----------------------|----------------|----------------|----------------|----------------|----------------|
| | % of BT | % of BT | % of BT | % of BT | % of BT |
| DOCUMENTARY | 11.2 | 1.0 | 2.8 | 0.5 | 11.5 |
| DRAMA: ONE OFF | 0.6 | - | - | - | 0.1 |
| GAMESHOW | - | 2.2 | 3.7 | 0.9 | - |
| INFORMATIVE | 11.1 | 2.7 | 4.5 | 11.7 | 15.3 |
| MINI SERIES | - | 1.1 | 0.3 | 0.1 | - |
| MOVIES | 2.2 | 11.6 | 9.2 | 6.8 | 14.1 |
| MUSIC | 7.1 | - | 0.0 | 4.8 | 0.8 |
| NEWS | 7.4 | 10.9 | 9.7 | 9.6 | 34.4 |
| COMEDY | 3.6 | 7.1 | 8.2 | 8.8 | 1.1 |
| CHILDRENS | 26.1 | 18.6 | 8.1 | 14.5 | 2.0 |
| AUSSIE DRAMA | 2.6 | 6.1 | 2.3 | 5.2 | 0.1 |
| CULTURAL | 3.3 | - | - | - | 0.3 |
| CURRENT AFFAIRS | 5.9 | 6.1 | 11.3 | 9.6 | 1.0 |
| RELIGIOUS | 0.7 | 0.5 | 0.6 | 0.4 | - |
| SPECIALS | 0.2 | 2.7 | 2.1 | 1.3 | 1.2 |
| SPORTS | 7.6 | 18.7 | 16.4 | 14.1 | 13.6 |
| VARIETY | 2.8 | 3.8 | 8.6 | 4.4 | 1.2 |
| OTHER SERIALS & DRAMA | 7.5 | 6.8 | 12.2 | 7.4 | 3.2 |
| TOTAL | 100.0 | 100.0 | 100.0 | 100.0 | 100.0 |

Note: see notes at beginning of Attachment

The ABC is an integral part of the Australian production and broadcasting industries. Its relationships are extensive and encompass aspects of programming, production and training.

Independent Production Industry

The ABC works with members of the independent production industry to develop and produce television programs. They include drama, comedy, documentary, etc. by way of co-production, commission, acquisition, etc. The ABC values its relationship with this important sector.

Craft Guilds

The ABC works with the craft guilds, such as the MEAA (representing actors and announcers), SPAA (screen producers), ASDA (screen directors), AWG (writers) and Screen Rights (composers and musicians), whose work appears in films and television programs.

Trades Unions

The ABC has three unions covering its employees - the MEAA (covering journalists at the ABC and elsewhere), the CPSU (many ABC broadcasting and administrative classifications) and APESMA (covering ABC senior executives and engineers).

Commercial and Community Broadcasting Industry

The ABC Charter requires it to provide innovative and comprehensive broadcasting services of a high standard as part of the Australian broadcasting system consisting of national, commercial and community sectors (s.6(1)(a)) and to take account of the broadcasting services provided by the commercial and community sectors of the Australian broadcasting system (s.6(2)(a)(i)). The ABC discusses the full range of industry issues with its commercial colleagues and to a lesser extent with its community colleagues. The ABC participates in industry forums with FACTS, FARB, CBAA, ASTRA, etc.

Special Broadcasting Service

The ABC Act requires the ABC to have regard to the services provided by the SBS (s.26). The ABC has close relations with SBS and discusses the full range of industry and national broadcasting issues with SBS colleagues.

Federal Government Departments and Agencies

The major agencies with whom the ABC deals are the Australian Film Finance Corporation (AFFC) which is sometimes called the film industry banker and the Australian Film Commission (AFC) which is sometimes called the film industry developer. The ABC also has a relationship with Film Australia, particularly in relation to the production and broadcast of documentaries.

From time to time, various government departments contribute funds to specific projects for ABC Online relevant to their portfolios, eg. "The Lab" science site and "The Space", a culture and arts site.

State Government Agencies

The States have film and television offices (various titles) designed to develop aspects of the production industry and to attract production to their particular state. The ABC has accords or agreements with several of these agencies.

Cultural Organisations

The ABC has close links with the organisers of major cultural and music festivals around Australia. The ABC also has close links with local festivals of various kinds. The relationship may take the form of direct co-productions (eg. with the NSW Art Gallery), broadly based collaborative arrangements, broadcast of material, coverage, etc. The major cultural bodies with whom the ABC deals include the network of six symphony orchestras led by Symphony Australia, Musica Viva, Opera Australia, Australian Music Centre, etc. From time to time, the ABC receives direct grant funding for specific purposes via the Australia Council or the Australian Film Commission.

Educational Institutions

ABC education areas have close links with educational institutions. They include the State Education Departments (in fulfilment of the ABC Charter - s.6(2)(a)(v)), Open Learning, universities with whom the ABC has worked on educational programs which include broadcast and online features.

Overseas Broadcasters and News Services

The ABC has output deals with the BBC and Channel Four and agreements with international news agencies and overseas broadcasters. The ABC also works with international broadcasting organisations such as the EBU, the ABU, PBI, etc.

Training Institutions

The ABC works with training institutions such as the Australian Film, Television and Radio School, the Victorian College of the Arts, the National Institute of Dramatic Art, the Western Australian Academy of Performing Arts, Charles Sturt University.

The ABC has, for example, an arts exchange training program between ABC Radio Arts and the Media Arts Department of The University of Technology Sydney. It is a formal creative consortium involving staff exchanges, co-hosting visits by overseas artists and the development of student works for broadcast.

The ABC is widely recognised as a trainer of the industry. Many ABC courses are open to people from the commercial and community sectors and SBS who wish to participate. Many trained ABC personnel at some time in their careers join the commercial sector, taking their ABC-acquired skills with them.

Online Services

The ABC has a funding relationship with various Government departments - Department of Industry, Science and Resources (The Lab science site, three cross-media traineeships and a media fellowship scheme).

Department of Communications, Information Technology and the Arts via the Australian Cultural Network (The Space arts and cultural site, plus co-productions with the National Gallery of Victoria on the Russell Drysdale project).

Learn Online has received funding from the British Council (for the civics site), Online Australia and Monash University

Department of Employment Education Training and Youth Affairs (the Australian Schools site and Challenge via the Department's Learning 21 Project)

Department of Primary Industries and Energy and the Rural Industries Development Corporation (Heywire Project for rural youth involving ABC Online and Triple J)

Australia Council - LOUD (youth media festival)

NOIE - creative collaboration between ABC and NOIE for Online Australia Day and Online Australia Year

Australian Film Corporation, ABC Online and Triple J co-production - Stuff Art (interactive arts site)

Federation Site - Australians Online mounted by the ABC with DCITA funding via the Centenary of Federation Council, in content partnerships with the Australian Libraries Association, Local Government Association and the Australian Bureau of Statistics.

Performing Arts Museum - co-production arrangement.

ABC Code of Practice**1. Preamble**

The ABC's place in the broadcasting system is distinctive because of its Charter, which gives the Corporation unique responsibilities, and because of other provisions under the *Australian Broadcasting Corporation Act, 1983*, which give the Corporation particular responsibilities, for example, the provision of an independent news service.

The ABC Act guarantees the editorial independence of the Corporation's program services. The ABC holds its power to make programming decisions on behalf of the people of Australia. By law and convention neither the Government nor Parliament seeks to intervene in those decisions.

2. General Program Codes

The guiding principle in the application of the following general program codes is context. What is unacceptable in one context may be appropriate and acceptable in another. However, the use of language and images for no other purpose but to offend is not acceptable.

The code is not intended to ban certain types of language or images from bona fide dramatic or literary treatments, nor is it intended to exclude such references from legitimate reportage, debate or documentaries. Where appropriate, audiences will be given advance notice of the content of the program.

2.1 Violence. The presentation or portrayal of violence must be justifiable, or else the material should not be presented. Particular attention should be paid to the portrayal of violence against women.

In news and current affairs programs, violent events should never be sensationalised or presented for their own sake.

In drama programs, the aim is not to see how much violence will be tolerated, but how little is necessary to achieve honest ends without undue dramatic compromise.

2.2 Language. Variations of language favoured by different groups of Australians — young or old, well educated or less educated, migrants, Indigenous and others — are equally valid and have their place in programs. On occasions, the language of one group may be distasteful to another. Use of such language is permitted provided it is not used gratuitously and provided the language can be justified in the context of, for example, fiction, documentary, dramatisation, comedy and song lyrics.**2.3 Sex and Sexuality.** Provided it is handled with integrity, any of the following treatments of sex and sexuality may be appropriate and necessary to a program:

- it can be discussed and reported in the context of news, information or documentary programs;
- it can be referred to in drama, comedy, lyrics or fictional programs; and
- it can be depicted, implicitly or explicitly.

2.4 Discrimination. The presentation or portrayal of people in a way which is likely to encourage denigration of or discrimination against any person or section of the community on account of race, ethnicity, nationality, sex, age, disability or illness, social or occupational status, sexual preference or the holding of any religious, cultural or

political belief will be avoided. The requirement is not intended to prevent the broadcast of material which is factual, or the expression of genuinely-held opinion in a news or current affairs program, or in the legitimate context of a humorous, satirical or dramatic work.

- 2.5 Privacy.** The rights of individuals to privacy should be respected in all ABC programs. However, in order to provide information which relates to a person's performance of public duties or about other matters of public interest, intrusions upon privacy may, in some circumstances, be justified.

3. Specific Program Codes

- 3.1 Children's Programs.** While the real world should not be concealed from children, special care will be taken to ensure programs children are likely to watch unsupervised will not cause alarm or distress.

- 3.2 Religious Programs.** Religious programs may cover Christianity, other traditional religions and new religious movements, as well as analysis and discussion of religious issues from non-religious points of view.

- 3.3 Aboriginal and Torres Strait Islander Programs.** Program makers and journalists should respect Aboriginal and Torres Strait Islander cultures. Particular care should be exercised in traditional matters such as the naming or depicting of Aboriginal and Torres Strait Islander people after death.

- 3.4 Portrayal of Women and Avoidance of Stereotypes.** Programs will take care to acknowledge the full range of roles now performed by women. Irrelevant references to a woman's physical characteristics, marital status or maternity will be avoided.

Programs should not promote or endorse inaccurate, demeaning or discriminatory stereotypes of women or men.

In producing programs using experts, interviewees and other talent, program makers will ensure that there are opportunities for both women and men to present viewpoints.

- 3.5 Closed Captioning for People who are Hearing Impaired or Deaf.** Closed caption programs will be clearly marked when program information is provided to the press or when captioned programs are promoted. Where possible, open captioned advice will be provided if technical problems prevent scheduled closed captioning.

Addresses to the nation and events of national significance will be transmitted with closed captioning. The ABC will endeavour to increase the amount of closed-captioning programming, as resources permit.

4. News, Current Affairs and Information Programs

4.1 News, Current Affairs and Information Programs

In programs produced by ABC News and Current Affairs Departments and information programs:

- (a) Every reasonable effort must be made to ensure that the factual content of programs is accurate. Demonstrable errors will be corrected in a timely manner and in a form most suited to the circumstances.
- (b) Editorial staff will not be obliged to disclose confidential sources which they are entitled to protect at all times.
- (c) Re-enactments of events will be clearly identified as such and presented in a way which will not mislead audiences.

- (d) If reported at all, suicides will be reported in moderate terms and will usually avoid details of method.
- (e) Sensitivity will be exercised in broadcasting images of or interviews with bereaved relatives and survivors or witnesses of traumatic incidents.

4.2 News and Current Affairs Programs

Every reasonable effort must be made to ensure that the content of programs produced by ABC News and Current Affairs Departments is:

- (a) impartial: impartiality does not require editorial staff to be unquestioning; nor should all sides of an issue be devoted the same amount of time.
- (b) balanced: balance will be sought through the presentation, as far as possible, of principal relevant viewpoints on matters of importance. The requirement may not always be reached within a single program or news bulletin, but will be achieved within a reasonable period.

4.3 News Flashes. Care will be exercised in the selection of sounds and images and consideration given to the likely composition of the audience.

4.4 News Updates and News Promotions. News updates and news promotions will not appear during obviously inappropriate programs, especially programs directed at young children. Due to their repetitive nature, there will be very little violent material included in them, and none at all in the late afternoon and early evening.

5. Promotions for Programs

Program promotions will be scheduled so as to be consistent with the nature of surrounding programs.

6. Warnings

Where appropriate, the audience will be given advance notice of programs or program segments which some viewers or listeners could find distressing or disturbing.

7. Television Program Classifications

This system of television program classification applies the Guidelines for the Classification of Films and Videotapes issued by the Office of Film and Literature Classification.

Programs having a particular classification under the Office of Film and Literature Classification Guidelines may be modified so that they are suitable for broadcast or suitable for broadcast at particular times.

7.1 Classification

G — General (suitable for all ages)

G programs, which include programs designed for pre-school and school age children:

- are suitable for children to watch on their own;
- may be shown at any time.

PG — Parental Guidance (parental guidance recommended for persons under 15 years)

PG programs:

- may contain adult themes and concepts which, when viewed by those under 15 years, may require the guidance of an adult;

- may be shown between
8.30 a.m. and 4.00 p.m. on weekdays
7.30 p.m. and 6.00 a.m. on any day of the week.

M — Mature Audience programs
and

MA — Mature Adult Audience programs

- are programs which, because of the matter they contain or because of the way it is treated, are recommended for viewing only by persons aged 15 years or over.

M programs may be shown between:

noon and 3.00 p.m. on weekdays that are school days
8.30 p.m. and 5.00 a.m. on any day of the week.

MA programs may be shown between:

9.30 p.m. and 5.00 a.m. on any day of the week.

While most adult themes may be dealt with, the degree of explicitness and intensity of treatment will determine what can be accommodated in the M and MA classifications

— the less explicit or less intense material will be included in the M classification and the more explicit or more intense material, especially violent material, will be included in the MA classification.

X programs and unmodified R programs (not suitable for television)

- contain material which cannot appropriately be classified as G, PG, M or MA because the material itself or the way it is treated renders them unsuitable for television;
- must not be shown at all.

7.2 Implementation Guidelines. The time zones for each program classification are guides to the most likely placement of programs within that classification. They are not hard and fast rules and there will be occasions on which programs or segments of programs appear in other time-slots, for example, a PG program or segment of a program designed for teenage viewers could appear before 7.30 p.m. if that is the time most suitable for the target audience, or a PG segment in an arts program could appear during a weekend daytime program.

There must be sound reasons for any departure from the time zone for a program classification.

Programs which are serious presentations of moral, social or cultural issues, may appear outside their normal classification period provided that a clear indication of the nature and content of the program is given at its commencement.

7.3 Television Classification Symbols. The classification symbol of the PG, M or MA program (except news, current affairs, general information and sporting programs) being shown will be displayed at the commencement of the program.

The classification symbol of the PG, M or MA program (except news, current affairs, general information and sporting programs) being promoted will be displayed during the promotion.

7.4 Consumer Advice. Audio and visual consumer advice on the reasons for an M or MA classification will be given prior to the commencement of an M or MA program.

8. Complaints

8.1 This Code of Practice does not apply to complaints concerning programs which are or become the subject of legal proceedings.

Complaints that the ABC has acted contrary to this Code of Practice should be directed to the ABC in the first instance. Phone complainants seeking a response from the ABC will be asked to put their complaint in writing. All such written complaints will receive a response from the ABC within 60 days from receipt of the written complaint.

The ABC will make every reasonable effort to resolve complaints about Code of Practice matters, except where a complaint is clearly frivolous, vexatious or not made in good faith or the complainant is vexatious or not acting in good faith.

8.2 Independent Complaints Review Panel. The ABC has established an Independent Complaints Review Panel (ICRP) to review written complaints which relate to allegations of serious cases of bias, lack of balance or unfair treatment arising from an ABC broadcast or broadcasts.

If a complainant making such an allegation does not receive a response from the ABC within six weeks or is not satisfied with the response, the complainant may ask the Convener of the ICRP to accept the complaint for review. Further information can be obtained from the Convener, Independent Complaints Review Panel, GPO Box 688, Sydney, NSW 2001 or by phoning (02) 9333 5639.

If the Convener rejects the complaint or if the complainant is dissatisfied with the outcome of the review and the complaint is covered by the ABC Code of Practice, the complainant may make a complaint to the Australian Broadcasting Authority about the matter.

8.3 Australian Broadcasting Authority. If a complainant:

- does not receive a response from the ABC within 60 days; or
- the complainant is dissatisfied with the ABC response; or
- the complainant is dissatisfied with the outcome of the ICRP review (as mentioned above); and
- the complaint is covered by the ABC Code of Practice;

the complainant may make a complaint to the Australian Broadcasting Authority about the matter.

**ABC SUBMISSION TO THE MULTICHANNELLING REVIEW ATTACHMENT 7
UNDER THE BSA**

AUSTRALIAN BROADCASTING CORPORATION

SUBMISSION TO THE

REVIEW INTO MULTI-CHANNELLING

BY THE NATIONAL BROADCASTERS

16 February 1999

THE AUSTRALIAN BROADCASTING CORPORATION'S RESPONSE TO THE MULTI-CHANNELLING REVIEW

1. Introduction

THE ABC welcomes the opportunity to respond to the Department of Communications, Information Technology and the Arts' Issues Paper for the Review of Multi-channelling by the National Broadcasters.

This submission has two parts and an accompanying overview of the ABC's position on digital broadcasting and multi-channelling. This accompanying overview includes the content strategy which was approved by the ABC Board at its December 1998 meeting. This will guide and shape the ABC's use of the additional capacity of digital broadcasting, subject to the decisions reached following the departmental reviews.

The first part provides the ABC's proposals on the legislative changes necessary to allow the national broadcasters to provide multi-channel programming, as is required under the terms of the Statutory Review.

The second section of the submission addresses the additional policy issues canvassed in Part B of the Issues Paper.

Part One

2. Legislative amendments

THE ABC's response to this review is designed to assist the Department to set clear boundaries on the digital broadcasting services that the ABC can provide. These recommendations are proposed within the Government's overarching policy and the legislative framework that requires the ABC to determine the content of, and take responsibility for, its services. The review is required under Clause 59(dc), Schedule 4 of the *Broadcasting Services Act* (BSA) to assess:

the extent to which any amendments of laws of the Commonwealth are required to be made in order to allow a national broadcaster, during the simulcast period for a coverage area, to use multi-channel transmission capacity to broadcast television programs in digital mode in that area where:

- (i) the programs are in addition to programs that are broadcast simultaneously by the national broadcaster in both analog mode and digital mode in that area; and*
- (ii) the broadcast of the programs is in accordance with the charter of the national broadcaster.*

To fully appreciate the ABC's position on multi-channelling it may be helpful to recognise its genesis in the policy debate that preceded the allocation of the 7 megahertz of spectrum to each of the free to air broadcasters.

At the time of passage of the *Television Broadcasting Services (Digital Conversion) Act 1998* (the Digital Conversion Act), it was understood that Parliament intended to adopt a position which supported the ability of the national broadcasters to multi-channel, while prohibiting the commercial free to air broadcasters from multi-channelling. This was designed to satisfy the policy objectives of limiting the potential competition with the subscription television sector, enabling the national public broadcasters to better meet their charter responsibilities and ensuring that Australian audiences are able to gain access to a wide range of digital broadcasting services.

In order to clarify and reflect the policy differences between the commercial and national public free to air sectors, Clause 59(1) (dc) of Schedule 4 of the BSA was inserted. This clause specifically requires the Minister to conduct a review to determine the extent to which laws need to be changed in order to allow the national broadcasters to provide multi-channel services in addition to the simulcast service and in keeping with the ABC and SBS charters. There was no review proposed to consider multi-channelling by the commercial free to air broadcasters.

The commercial and national public free to air broadcasters were therefore treated differently. The amendment was proposed by Government and agreed to by both the Opposition and minor parties in Parliament.

3.1 Definition of Multi-channelling

- **Need for definition during simulcast period**

The Issues Paper asks (paragraphs 10 & 11) whether a legislative definition of multi-channelling should be developed before the end of the simulcast period. The ABC believes that there must be clearly defined boundaries of the content that broadcasters can provide during the simulcast period to provide regulatory certainty. Indeed, the definition's primary importance will be during the simulcast period, when its function will be to delineate simulcast programming from non-simulcast programming.

- **Content of Multi-channelling definition**

Currently, there is no definition of multi-channelling in legislation. For the purposes of the Review, the ABC's previous submissions on datacasting and enhanced programming argued that multi-channelling and enhanced programming were mutually exclusive subsets of programming that was not simulcast.

This Issues Paper, however, suggests another variation on the interpretation of multi-channelling. Under this interpretation, multi-channelling refers to all programming on the digital channel that is not simulcast. Under this definition, multi-channelling would include both enhanced and non-enhanced programming.

There is little significant difference between the two interpretations for national public broadcasters. While the national public broadcasters will be able to transmit programs that could be categorised as enhanced or multi-channel, the commercial free to air broadcasters will be able to transmit only enhanced programming in addition to the simulcast service.

- **Location of Definition**

The Issues Paper also asks whether the definition of multi-channelling should be included in the ABC and SBS Acts.

The ABC believes that all definitions of programming relating to the simulcast period should be included in the BSA. The definitions of multi-channelling, datacasting and enhanced programming all relate to policy objectives contained in legislation which is primarily concerned with the simulcast period. All three definitions, therefore, should be included in Schedule 4 of the BSA which relates to the simulcast period. Further, all three definitions should be the subject of reviews to be held by the end of 2005, as required under Clause 60, Schedule 4, BSA.

The ABC proposes that:

- **multi-channelling be defined in amendments to the BSA prior to the commencement of the simulcast period;**
- **the multi-channelling definition be included in Schedule 4, BSA;**
- **multi-channelling be defined as all programming provided by a broadcaster on the digital channel which is not simulcast programming in digital mode of programs being broadcast by that broadcaster in that coverage area; and**
- **the definition of multi-channelling be included in the Clause 60 issues to be reviewed by the end of 2005.**

3.2. Required Change to Prohibition on Multi-channelling

The Statutory Review asks to what extent laws need to be changed to permit national broadcasters to use multi-channel transmission capacity to broadcast television programs in digital mode.

Clause 35(1) Schedule 4 of the BSA prohibits national broadcasters from transmitting programming in digital mode during the simulcast period unless that programming is also transmitted simultaneously in analog mode. Unless that Clause is amended, no other programming - ie multi-channelling - is allowed.

An important policy objective of Government is to ensure that no one is deprived of access to television. This is met by requiring both analog and digital transmission during the simulcast period. That objective can still be achieved, while also allowing multi-channelling, by requiring that a national broadcaster simultaneously broadcast on a digital channel the programs available on the analog channel. The policy objective of access to television programs will be preserved, leaving national broadcasters the flexibility to provide additional programming when capacity permits.

The ABC proposes that:

Clause 35(1) Schedule 4 of the BSA be amended to require:

If there is a simulcast period for a coverage area, a national broadcaster must simultaneously broadcast in digital mode a television program that is the program being broadcast in analog mode in that coverage area.

3.3 National Broadcaster Provision of Narrowcast Services

The ability to offer multi-channel services will give the ABC a greater opportunity to provide both general and specialised programming for all Australians. The Review provision in the legislation anticipates that all programming in digital mode will be within the scope of the national broadcasters' Charters. This raises the question of what restrictions, if any, should be placed in Clause 36.

The general powers of the ABC (section 25 ABC Act) are necessarily limited to acting in accordance with and to further the ABC's functions (ie the Charter set out in section 6 ABC Act). For this reason the ABC suggests that no express limitation on programming is required beyond the existing limits on the ABC's autonomy.

The ABC is, however, concerned about the Clause 36(1)(g) restriction relating to narrowcast services and its apparent inconsistency with the ABC's Charter. The Charter requires the ABC to provide programs of wide appeal as well as those that meet more specialised interests.

The ABC's content strategy for multi-channelling includes provision of programming streams (learning and information) that will have both a general and a specialist appeal. While these programming streams clearly fall within the ABC Charter, the Issues Paper (paragraphs 12 - 13) raises the possibility that such content streams might be considered narrowcast programming. If so they could be caught within the prohibition of Clause 36(1)(g).

The ABC is therefore concerned that, if the prohibition in Clause 36(1)(g) remains, the national public broadcaster may be prevented from providing programming for specialised audiences. This would be contrary to its Charter responsibilities. Instead it may be limited in the use of its multi-channel capacity to provide programming with wide audience appeal, which is the mainstay of the commercial industry. This would undermine the capacity of multi-channelling to better meet the diverse needs of Australian audiences.

The Issues Paper also suggests (paragraph 14) that national broadcasters could lease spare digital capacity and allow others to circumvent the prohibition on national broadcaster provision of commercial, subscription or narrowcast services, particularly open narrowcast television services. The ABC accepts that the lease of such capacity should not be used to circumvent those prohibitions.

The wording of Clause 36(1) prevents national broadcasters from operating or 'permitting the operation of' the transmitter to broadcast the services, set out in the Clause, in digital mode. The ABC understands 'permitting the operation of...', as covering the arrangements whereby the National Transmission Agency, as the authorised operator of the transmitter, transmits the ABC's programs. If this is so, the provision is intended to have application only to broadcasting by the national broadcasters, not third parties using the capacity. The ABC certainly believes that is the proper scope of the provision but the wording of the clause lacks clarity. It should be amended to avoid doubt as to its ambit.

Regulation of any third party transmission using the same facilities (under a lease from the ABC) should be governed by rules set out in the place appropriate for regulation of that third party, not in the legislation dealing with national broadcasters. For example, prohibitions affecting narrowcasters in the digital environment should be addressed in their class licences.

Clause 36(2) has no meaning as it refers to a provision in Clause 35 that no longer exists.

The ABC proposes that:

- **Clause 36(1) be amended to refer only to operation of a transmitter in digital mode by or on behalf of a national broadcaster;**
- **Clause 36(1)(g) be omitted; and**
- **Clause 36(2) be omitted.**

3.4 Transmitter Licences for Multi-channelling

Section 100B(1) and (2) of the *Radiocommunications Act* now permits the National Broadcasting Service (NBS) transmitter licences to be allocated by the Australian Communications Authority to be used either for simulcast programming or datacasting, consistent with the current legislative framework. That section will need to be amended to allow the NBS transmitter licence to also provide multi-channel programming.

The ABC proposes that:

Section 100B(1) of the *Radiocommunications Act* be amended to allow the transmitter to be used to provide multi-channel services.

3.5 Programming Subject to HDTV Obligations

The Issues Paper points out (paragraph 15) that any legislative amendments that authorise multi-channelling would be subject to HDTV requirements of some kind. The ABC accepts this. The national public broadcaster understands that HDTV demands for spectrum will mean that the digital capacity available for multi-channel programming will be limited.

3.6 Limitations on National Broadcaster Multi-channelling

The Statutory Review makes no reference to limitations on national broadcaster multi-channelling. The Issues Paper however asks (paragraphs 40 to 47) whether limitations on national broadcaster multi-channelling might be imposed through legislation, either on the types of programming provided or the timing and or location of multi-channel programming. These questions are addressed in greater detail in Part Two.

As previously discussed, the ABC believes that the provisions of the digital legislation intend that the ABC will only be permitted to use its digital capacity to provide Charter programming. In keeping with the terms of this Review that is the only restriction which should be placed on ABC multi-channelling. Any other restrictions may reduce the ABC's ability to program flexibly to meet the special needs of its audiences. This could limit services to rural and remote Australia,

specialised information, educational programming and other activities which are otherwise recognised as within the scope of the ABC's Charter.

The ABC proposes that:

- **national broadcaster programming which is multi-channelling on the digital channel be consistent with the requirements of the national broadcaster charters; and**
- **no further restrictions be placed on the national broadcasters providing multi-channel programming.**

4. Links to Other Statutory Reviews

4.1 Datacasting and Enhanced Programming

The ABC's earlier submissions to these reviews argued the need for clear definitions for datacasting, enhanced programming and multi-channelling. These definitions should be incorporated in Schedule 4, BSA, to give regulatory certainty for both broadcasters and datacasters on the limits of content that can be provided under the digital conversion regime.

4.2 Other Reviews

Other reviews which will impact on the ABC's content strategies include the review into HDTV standards, the captioning standards and the inquiry into underserved areas. The many technical issues surrounding the conversion to digital broadcasting include the review into datacasting standards; the review of technical aspects of HDTV; and the development of Conversion and Implementation Plans.

Part Two

5. Role of national public broadcasting in the digital age

THE NATIONAL public broadcasters have an important role to play in the development and adoption of digital broadcasting in Australia. The ability of the ABC and SBS to participate in the provision of new services will help determine the success of the conversion to digital broadcasting in this country. Digital television will be the gateway to the information age for many. Access to the innovative, comprehensive and specialised content provided by the national public broadcasters will, to some extent, facilitate the active participation of many Australians in the emerging information society.

In the new era of communications that will evolve following the introduction of digital broadcasting there is a continuing role for public broadcasting. This is recognised internationally¹ as other countries take steps to preserve and develop their public broadcasting infrastructure. The value of strong public broadcasting will be especially important in a country such as Australia, which has crafted an enviable mixed media economy. This includes commercial and non-commercial broadcasters and a film, television and multi-media production industry that is the product both of private investment and public sector support. The long-term investment by Australian taxpayers in the national public broadcasting system will now help ensure that this country enters the age of digital broadcasting with a strong and diverse base for future content production and distribution.

The digital broadcasting era will be characterised by a plethora of choice. In time audiences are likely to have access to a vast quantity of international programming and new methods of receiving and interacting with them. In this environment, comprehensive public broadcasters with an explicit obligation to contribute to a sense of national identity, to inform, entertain and reflect the cultural diversity of the Australian community, will be of inestimable value. They will be crucial to a sense of national well-being, confidence and competence.

The non-commercial nature of the national public broadcasters will ensure that all Australians can have access to comprehensive and innovative programming, irrespective of their private capacity to pay for additional channels and services. A digital television receiver will become the entry point for many Australians to the internet and the information society.

The explicitly Australian focus of the national public broadcasters will also be an important touchstone in developing content that makes sense of the local in an increasingly global media world. As such the national public broadcasters will

¹ Charting the Digital Broadcasting Future, Final report of the Advisory committee on Public Interest Obligations of Digital Television Broadcasters, Washington DC, December 1998; The BBC Beyond 2000, Broadcasting House, London, 1998

contribute to the cultural, social, civic and educational well-being of Australia in the global information economy.

To some extent the passage of the amendment to the *Digital Conversion Act*, to enable the national public broadcasters to offer multiple channels, gives these arguments some strength. As a result, subject to the statutory reviews, during the initial period of digital broadcasting Australian audiences should have access to a mix of high definition television, enhanced programs, datacasting and multi-channels.

This mix will ensure that audiences have a wide choice and are given local programming incentives to upgrade to digital receivers. The ABC believes it is important to retain flexibility in the use of the digital spectrum to allow timely responses to evolving audience preferences. The mixed approach will help ensure that the future of digital broadcasting in Australia is determined by market choice in a system that respects both commercial and non-commercial imperatives and values.

6. Public benefit of national public broadcasters providing multi-channels

The public benefit of removing the legislative restriction on the provision of multiple channels by the national public broadcasters extends beyond the role that they will play in furthering the Parliament's goal of the rapid uptake of digital broadcasting and active Australian participation in the information society.

The ability to offer multiple channels, as part of a mix of services, will enable the national public broadcasters to better meet their charter responsibilities and the non-commercial needs of diverse Australian audiences. It will also ensure that the ABC continues to play an important innovative role and fosters an informed sense of national identity as a result of its comprehensive mix of broad appeal and specialised programming.

The ABC considers that the ability to offer multiple channels will bring a number of benefits:

- better meeting the needs of all Australians and fulfil its Charter responsibilities;
- providing new, non-commercial services for audiences;
- better meeting the particular needs of those living in regional areas;
- testing multiple channel programming for the broadcasting industry;
- providing opportunities for talented program-makers and producers to explore new technical and creative possibilities; and
- providing outlets for original new Australian content at a time of unprecedented global programming.

6.1 Public benefit: Charter responsibilities

As the comprehensive national broadcaster, the ABC has been and will continue to be an integral part of the ecology of the Australian communications industry. This industry is now undergoing rapid change and evolving as it extends from the traditional realms of radio and television into online and interactive services. The

way in which the ABC participates in this industry is framed by the ABC Act, which sets out its underlying and enduring role. The ABC's first function is:

*To provide within Australia **innovative and comprehensive** broadcasting services of a high standard as part of the Australian broadcasting system consisting of national, commercial and community sectors and without limiting the generality of the foregoing, to provide:*

- (i) broadcasting programs that contribute to a sense of national identity and inform and entertain, and reflect the cultural diversity of the Australian community; and*
- (ii) broadcasting programs of an educational nature.*

In providing such services, the ABC shall take account of:

- (i) the broadcasting services provided by the commercial and community sectors of the Australian broadcasting system;*
- (ii) the standards from time to time determined by the Australian Broadcasting Authority (ABA) in respect of broadcasting services;*
- (iii) the responsibility of the Corporation as the provider of an independent national broadcasting service to provide a balance between broadcasting program of wide appeal and specialised broadcasting programs;*
- (iv) the multicultural character of the Australian community; and*
- (v) in connection with the provision of broadcasting programs of an educational nature - the responsibilities of the States in relation to education (see Section 6 of the ABC Act)*

The ABC has endeavoured to satisfy these obligations through its national television network, its six radio networks, its online services and its commercial enterprises. To a large extent it has been successful in this. A recent Newspoll, for instance, found that more than 90 percent considered the ABC was doing a good job, 86 percent rated ABC Television programs as good, similarly for radio. One hundred percent rated Online as good. These figures were also reflected in the ABC's most recent ratings, which showed the national public broadcaster in 1998 had had its best year ever, with a nearly 15 percent share of prime time television audiences and more than 20 percent of radio audiences, across the combined networks of the ABC.

While these figures are gratifying, they point to the fact that the ABC is better able to meet its charter obligations through its radio networks than with its one television network. To squeeze the diversity of Australia into one national, comprehensive television service is a challenge. The ABC has addressed the competing interests of audiences by developing a programming schedule that is both comprehensive and specialised, national and local. From time to time however this gives rise to concerns about the range of programs available, especially from those living outside the Sydney, Melbourne, Canberra triangle.

To a considerable extent this bottleneck will be removed by granting the ABC the right to offer multiple channels. This will enable more programs that address the particular interests of diverse audience groups to find a place on television.

In the digital environment the ABC will be able to more fully reflect the diversity of Australia on television, and in doing so it will offer something quite different from and in addition to the services provided by the commercial sector. Whereas the commercial sector has a responsibility to serve shareholders, the ABC has a responsibility to “*contribute to a sense of national identity and inform and entertain, and reflect the cultural diversity of the Australian community*”. This distinctive role will remain important in the digital environment.

Industry analysts predict that at some time after the introduction of digital broadcasting there will be some audience fragmentation, as viewers respond to the greater range of choices. This will place a particular responsibility on the ABC to provide both broad appeal and specialised services. The ABC proposes to use the multiple channel capacity of digital television to provide a comprehensive mix of services including specialised programs to reflect both the regional diversity and the diversity of communities of interest around Australia.

6.2 Public benefit: digital innovation

The ABC is charged with a particular responsibility to provide innovative programs. This is a responsibility that is cherished within the national public broadcaster and by audiences. Its innovation is also respected in the commercial industry.

Since its inception the ABC has been an innovator, developing and adapting programs and services that have subsequently become industry standards. The Australian television industry is indebted to the ABC for the development of programming genres, such as current affairs, studio based children’s programs, drama series and low cost digital production. Many of these, and other genres, have expanded as they have been adopted and developed within the commercial industry. Programming innovation is necessarily a dynamic activity, and one in which the ABC has been at the forefront in Australia.

Similarly, the ABC has been diligent in the development of new services that meet the particular interests of audiences. These new services have been developed in a cost-effective manner, at a time of fiscal restraint. Three recent examples illustrate the way the national public broadcaster has been able to adapt changing technologies to emerging audience needs in a cost-effective, non-commercial manner, in keeping with its Charter responsibility: Triple J, Parliamentary News Network and ABC Online.

- Triple J, developed the possibilities of FM radio to create an innovative youth network that has been very important for young people around Australia and the development of the local music industry;
- NewsRadio on the Parliamentary and News Network, developed out of the production efficiencies that became apparent after the digitisation of radio production. This now provides a continuous radio news service and makes available a range of English language news and current affairs programs from overseas broadcasters; and

- ABC Online has developed internet sites that draw on ABC radio and television programs and creates new material. They are currently accessed by more than 7 million people each month. ABC multimedia has won numerous awards, as well as for multimedia CD-Roms including *Ingenious*, *Real Wild Child* which were developed in creative partnerships with other cultural organisations. It has also led the way in providing specialist cross-media traineeships.

The ABC is committed to maintaining and developing this innovative approach in the new digital environment. This will enable greater integration of video, audio, text and data services and offers the potential for a dramatic transformation of broadcasting and communications.

Digital production, distribution and reception will significantly increase opportunities for programming innovation. The ABC has already broadcast programs that take advantage of the lower costs of digital production, such as *Race Around the World*. Other programming innovations are likely to flow from the use of cost-effective digital technology.

Just as the ABC has been a programming innovator in radio and television, as well as at the forefront of content innovation as the internet reached a mass market, the national public broadcaster will be an important innovator following the introduction of digital broadcasting. For this to be realised, however, it will be essential that the ABC has the ability to make such programs and services available to audiences, by removing the bottleneck of a single television network.

Digital production, distribution and reception will make many new programming innovations possible. The potential for audience interactivity and providing additional layers of information and content to programs will act as a catalyst to further innovation for talented program makers and producers. The ABC will be an industry leader in these developments, and help ensure Australia's place in an emerging global market.

6.3 Public benefit : comprehensive and diverse

The ABC's place within the Australian broadcasting industry is distinctive and one that seems well suited to the likely shape of the digital environment. ABC audiences are accustomed to deliberately choosing the programs they wish to watch, and in a future with greater choice and audience fragmentation, this approach will become more common.

By offering multi-channels the ABC will draw on the talents and resources it has developed Australiawide to create the content that will satisfy the need to be comprehensive and specialised, innovative and balanced. The development of this new content will draw on the traditional areas of television production, but also makes extensive use of radio and online staff.

The ABC covers 98 percent of Australia, has a national network of 58 broadcast centres around the country giving it unrivalled knowledge of the issues and

concerns of Australians. While these centres have traditionally served their local radio audiences, the digital environment, and particularly multiple channels, will make it possible for them to bring these stories and interests to television. The ABC has already begun trials in some regional centres to develop television content. The outcome of these trials will help shape the ABC's development of regional services in advance of the provision of multiple channels.

Success in the information age will depend on the quality and accessibility of information available to citizens. The ABC's range and depth of information and its extensive archival resources make it a particularly important contributor to the national economic, cultural and social well-being.

Multi-channelling will enable the ABC to better serve different audiences by providing regional and rural audiences with more local information and community content. The ABC will explore opportunities for coverage of low-cost community events such as community forums and debates, in order to increase the level of participation and communication between segments of the Australian community.

The range of the ABC's radio resources, both in terms of geography and links to specialised communities of interest, will be an important resource in the development of programming content in future. This depth and range of content, from the specialised units within ABC radio and television will be drawn on in the programming decisions in the multi-channel environment. This will ensure that the ABC is better able to fulfil its Charter obligations and meet the comprehensive and diverse needs of Australian audiences.

6.4: Public benefits of multi- channelling: Conclusion

The ABC has a major role to play in the transformation of Australian society that is occurring as a result of the convergence of broadcasting, telecommunications and computing. This convergence will change the way we live, work and play. It will also change the way we see ourselves and the world.

By offering more than one television channel the ABC is keen to continue its role as a programming and technological innovator and contribute to the development of the broadcasting and communications industry. The ABC will ensure a direct public benefit as a result of its capacity to offer multiple channels, providing a mix of content and universal access. This will help guarantee that Australians have a sense of place in the digital information age.

7. Other uses of spectrum

The ABC has been provided with 7 megahertz of digital spectrum so that it can fully participate in digital television broadcasting.

The ABC will maximise the audience benefits of its digital television spectrum by making the full range of new programming possibilities available to all Australians -

high definition programming, lower resolution multichannel programming, enhanced programming and datacasting.

This submission argues that, for the national broadcasters, multichannelling is a vital component of that programming mix, given its capacity to extend opportunities to deliver charter based programming and contribute to greater programming diversity as digital television is rolled out.

The current review process will set the boundaries of possibilities for use of this spectrum. The ABC has made contribution to reviews on each aspect of digital broadcasting. We have consistently argued for maximum flexibility to operate within existing legislative boundaries, the framework of the Charter, and respecting the ABC Board's responsibility for establishing programming direction.

Once the outcomes of the digital reviews are known, it will be a matter for the ABC Board to decide the best possible usage of the spectrum.

8. The Industry Context

The Australian broadcasting industry supports a diverse and profitable commercial free to air and pay television industry and a strong and distinctive public sector. The strength of this mixed economy will be particularly important at a time of dramatic technological and social change. It will ensure that Australian audiences are able to take advantage of the developments in programming genres that are created and promoted appropriate for each sector.

The broadcasting industry is dynamic and responsive to the changing needs and interests of audiences. This is especially marked at a time of technological change. The introduction of digital technology will act as a trigger for the development of new styles and modes of content. At this stage it would be almost impossible for someone outside the industry to anticipate the likely new areas of content, or to identify the key drivers of future audience support. They will only become clear as new programs and services are tested and audience preferences shape subsequent decisions.

At a time of such uncertainty and rapid change, the importance of allowing each sector of the broadcasting industry the flexibility to find the best manner of meeting its audience, within overarching policy and regulatory guidelines, will be crucial. This is as important for the public sector as it is self-evident for the commercial sector. Responsibility for decisions about content and scheduling reside with the Board and senior management of each organisation.

The ABC has played an important part in the development and operation of the successful 'mixed economy' of Australian broadcasting. ABC and commercial radio have been important vehicles of cultural expression and the communication of ideas for most of this century. ABC and commercial free to air television have been a vital part of Australian culture for more than four decades. In more recent times

commercial pay television and public and commercial online services have become significant.

The ABC has made a major contribution to the Australian television industry by the development of new programs and services, as discussed above. Its role in the development and training of technicians, producers, presenters and reporters has also been central. The ABC's active training programs have ensured that it has generated a pool of talent and expertise, which is highly valued throughout the industry.

The Issues Paper canvasses the impact the national broadcasters' multi-channel services may have on commercial broadcasters. The ABC asserts that its ability to provide multi-channel services will be of value to the nation, including the commercial broadcasting industry, as it will:

- be able to more fully meet the obligations of its Charter;
- act as a stimulus for the purchase of digital receivers,
- test innovative uses of the digital technology, to better assess and meet audience needs;
- explore low cost production methods and outcomes;
- develop new programming genres, such as community conversations; and
- develop a pool of talented program-makers able to realise the potential of digital broadcasting.

8.1 Distinct role of public and commercial broadcasting sectors

Successive governments have recognised and reflected in legislation the separate and distinct contribution of the national public broadcasting and the commercial sectors. Each sector has an important role in creating the successful 'mixed economy' of the Australian industry.

It is therefore inappropriate to compare the two sectors on the basis of 'parity'. Their roles and objectives are so different that, despite the common outcome of television programs, it is difficult to define the terms in a way that would produce meaningful comparisons.

8.2 Impact on industry revenue

The ABC and SBS are non-profit broadcasters, funded by direct allocation from Treasury. They are accountable to a Board and the Parliament, and more generally to all Australian taxpayers. The ABC is prohibited from raising advertising revenue, while the SBS's advertising revenue goes entirely towards the production of programming. The ABC generates funds from its Enterprises division, which includes retail and industry sales. Any profit generated from these sales is applied directly to program production.

The national broadcasters' responsibility is to provide the best possible, comprehensive and innovative services for Australian audiences and to operate in the public interest. The free to air commercial and pay television operators are

accountable to their shareholders. Their responsibility is to maximise audiences and profit to ensure the best possible return to their shareholders.

The ABC's contribution to the nation cannot be measured in dollars alone, but in its capacity to enrich the cultural, social and civic life of the nation. It does this by producing independent, non commercial and innovative programming as cost effectively as possible, within the framework of its Charter and Act.

The ABC contends there would be no impact on the advertising revenue for the commercial free to air networks as a result of its multi-channels. (If the commercial free to air networks were to offer multiple channels, the chances of the new outlets 'cannibalising' advertising revenue would be much greater.) The additional services provided by the ABC are likely to meet the interests of specialised audiences or enhance convenience by time shifting. They are unlikely to draw a mass audience away from the commercial broadcasters during peak times.

The impact of the ABC on the pay television industry is difficult to assess, but is also likely to be negligible. The ABC is committed to drawing on its range and depth to generate new services that meet the diverse needs of audiences. Its new programming initiatives are explicitly non-commercial, such as educational services and community conversations.

Programming decisions will be shaped by its Charter obligations. At this stage the ABC's programming initiatives for digital choice in multichannelling focus on education, information and regional programming. In creating new programs for the multi-channel environment the ABC is conscious of the need to develop cost effective and innovative programs that provide balance across the entire broadcasting industry and expand the range of services available to Australian audiences. It is not the ABC's intention to replicate the services already provided by the pay television industry.

8.3 Impact on audiences

The ABC is seeking to meet the needs of new audiences with new services, rather than draw audiences away from existing services. It will generate programs and services that will demonstrate new uses of television, which may include a wider range of educational services and community conversations. The ABC does not believe that its additional services will have a significant impact on existing audiences during the simulcast period.

Moreover, in the early years of digital broadcasting, it is unlikely that there will be a measurable change in existing audience patterns. Most industry predictions are for a slow and cautious acquisition of digital receivers. This will mean that it will be some years before a mass audience will be likely to receive the full range of digital services, and provide an attractive market for advertisers.

The free to air broadcasting industry has assessed that any multi-channel audiences in the early stages are likely be very small. The Federation of Australian Commercial

Television Stations in its submission to the Department of Communications Information Technology and the Arts review of 'Enhanced Programming' argues:

'Advertiser-supported multi-channel services will not be commercially feasible until digital receiver penetration is relatively high (probably at least 35%-40%, which on even the most optimistic assessment will not be before 2006-7). This is because very small commercial audiences would not attract sufficient advertising revenue to meet the program and other costs of multi-channel services.' (FACTS submission: *Enhanced Programming, page 3*)

Furthermore, the effective limits on the multi-channel service as a result of high definition television transmission will reduce the potential audience for the ABC's multiple channels.

The likely slow uptake of multi-channel services should not, however, be interpreted as an argument against their introduction. The limited multi-channel services that will be offered by the national public broadcasters in the establishment phase of digital broadcasting are unlikely to dilute existing audiences. The lessons learned will, however, provide valuable market intelligence for subsequent developments in digital broadcasting.

It will be some years after 2001 before any trends in audience movement between free to air, public, pay and multi-channel programs become apparent. Best estimates at this stage are that ABC and SBS multi-channel services will have a negligible impact on audiences until at least 2007.

8.4. Restrictions on multi-channel programming

The Issues Paper also canvasses a range of possible restrictions on multi-channel programming by the national broadcasters. The ABC is strongly opposed to any of the restrictions mooted. Responsibility for programming and content on the ABC resides with the ABC Board and senior management. The ABC is editorially independent of the Government of the day. This is an important safeguard of the ABC's autonomy and its capacity to respond to changing audience needs and expectations.

The ABC's real and perceived independence is highly valued by audiences, staff and the industry. It must not be compromised by placing restrictions on multi-channel programming, beyond those that will apply more generally as a result of HDTV requirements.

Furthermore at a time of rapid change in a dynamic industry a decision by the Parliament to impose content restrictions would be contrary to the spirit of the times, and the accepted wisdom that excessive regulation is likely to impede technological development. The imposition of time, geography or content restrictions on multi-channelling would inevitably hamper development of the sector, lead to audience

dissatisfaction and raise the spectre of government intervention in the freedom of expression.

Finally, it should also be pointed out that, unlike the commercial free to air sector, the ABC is required under its Charter to take account of *'the broadcasting services provided by the commercial and community sectors of the Australian broadcasting system'*. The ABC would therefore as a matter of course consider the range of offerings by the commercial sector before making any programming and scheduling decisions for its additional channels.

8.5 Restrictions on type of programming

The ABC believes that the legislation already adequately addresses the issue of what sort of programming is appropriate for the ABC's additional channels: namely, those that fall within its Charter. The ABC's Charter provides a framework to enable the organisation to provide a range of broad appeal and specialised programs and services.

The ABC considers that any restrictions imposed on the type of programming that could be broadcast on an additional channel would be contrary to the Charter. Suggestions, for instance, that the ABC should be precluded from offering those programs currently considered to motivate subscriptions to pay television – movies and sport – would be contrary to the national public broadcaster's operational independence enshrined in the ABC Act. Such prohibitions would be rigid and leave the ABC unable to respond to a rapidly changing environment. On the other hand, they may completely miss other, as yet unidentified, content areas, which may emerge as particularly attractive to audiences.

Most importantly, as noted in the Issues Paper, the national broadcasters are independent in programming matters. Editorial responsibility legally rests with the ABC. The ABC Act states it is the **duty** of the ABC Board to ensure that:

the functions of the Corporation are performed efficiently and with the maximum benefit to the people of Australia; and (b) to maintain the independence and integrity of the Corporation. (Section 8(1) of the ABC Act)

Because of this legislative requirement, the ABC Board takes its responsibility to act in the public interest and with complete independence from the Government of the day. Its accountability to the Australian public is provided through the mechanisms by which it reports to Parliament.

Earlier in the letter accompanying this submission paper, the ABC outlined its plans for multi-channel programming. Programming streams focussed on education, information and regional services are consistent with the ABC's Charter priorities and of great value to the Australian public. Other uses of the multi-channel capacity to increase regional programming and audience access and convenience, by time switching, are also consistent with the core mission of the ABC Charter.

8.6 Time based restrictions

Any time-based restrictions on multi-channelling would create enormous technical difficulties. There will already be time limits on multi-channelling during periods of HDTV. The ABC seeks autonomy to broadcast in high definition television at those times that suit its audience priorities - such as children's programming - rather than in the prime periods as defined by the commercial free to air networks. Nonetheless HDTV will limit the spectrum available for multi-channel programs.

These technical difficulties will be complicated enough to resolve, depending on the type of HDTV programming (as yet undecided) required. To impose further time limits would be logistically unmanageable, because of the requirements of up to five different time zones across the country at various times of the year.

8.7 Geographical restrictions

Placing geographical restrictions on multi-channelling would be unacceptable to the ABC and to its audiences. The ABC is planning to convert to digital in metropolitan and regional centres as soon as possible and well within the timetable set by the *Digital Conversion Act*. This planning is predicated on the assumption that all Australians should be given access to the benefits of digital technology. To restrict services to some parts of the country would create two categories of citizens. If restrictions were placed on urban audiences, the outcry over misuse of public resources would be deafening. Similarly restrictions on rural and regional services would provoke intense political reaction.

The ABC is a truly national broadcaster. It has geographic coverage of 98 percent of the continent, maintains 58 broadcast centres and is within reach of almost every citizen. To restrict access of innovative new services to some, would run counter to the spirit of a national broadcaster. It would also be contrary to the Board's duty to ensure that the functions of the Corporation are performed efficiently and 'with the maximum benefit to the people of Australia'.

9. Funding

The funding of the ABC's multi-channel and other digital services is not a matter to be determined by this review. Funding of the ABC's digital conversion strategy has already been subject to agreement with the Government. The necessary funding to facilitate the production of content for the digital services will be the subject of separate negotiations between the ABC and the Minister for Communications, Information Technology and the Arts.

It is however important to note that the ABC believes that it can produce these extra channels and other digital services for minimal additional costs. This is not mere conjecture, but an observation grounded in the experience of developing new programs and services in recent years.

In part this is a legacy of the One ABC organisational strategy that has collapsed the traditional boundaries between radio and television production, and facilitated the

development of online and genuine cross media content. This organisational model is already producing efficiencies in content production, and this is likely to increase in future as co-location extends throughout the organisation.

Furthermore, by drawing on the resources of radio to generate content for television new efficiencies have been found. This efficiency has also been identified by pay television producers and can be seen in the development of new television programs adapted from a radio format. In the ABC's plans for the multi-channels considerable emphasis has been placed on programming with existing strong roots in radio, including community conversations and forums and coverage of major conventions and events. The lessons learned from decades of radio production will be applied afresh to the generation of digital content.

Operational efficiencies have also come as a result of using low cost portable digital television production equipment. As already noted, programs such as *Race Around the World* have demonstrated the potential use of digital cameras by reporters. The enterprise agreement with ABC staff currently under negotiation places considerable emphasis on such multi-skilling.

Efficiencies will also arise from the more effective use of existing content. NewsRadio, for instance, was developed as a direct consequence of the operating efficiencies that flowed from the development of the D-Card system. As a result it was not only possible to identify under-utilised resources, but to find new ways of reusing news and current affairs content to meet an identified audience demand for a full time radio news and current affairs network.

Similar principles have applied to the development of ABC Online. As these highly regarded sites are drawn from the content produced throughout the ABC it forms a pool of information, that both extends the existing life of ABC content, enables programs to find new audiences, develops new content and provides an archival resource of great value.

It should be noted that ABC Online currently receives more than 7 million 'hits' each month. This rate has more than doubled in the last twelve months. The ABC has achieved this impressive result on the basis of an initial investment of only \$750,000, and by marshalling the resources throughout the organisation to develop a new communications medium.

The current content plans for the multiple channels and digital broadcasting are based on a similar approach. The ABC will undertake to develop new content by achieving greater organisational efficiencies. It should be noted that similar productivity improvements in the costs of content generation have been secured by broadcasters internationally² directly as a result of the use of digital technology for program production.

² PricewaterhouseCoopers, Digital Television '99: Navigating the Transition in the US, December 1998: p 23 - 29

While the funding issues associated with the introduction of digital broadcasting are beyond the scope of this review, the ABC contends that it will be able to achieve the goals it has set for itself. This expectation is grounded in its experience in recent years with the development of new programs and services and based on international best practice which points to impressive efficiencies as a result of the use of digital equipment for production, storage and distribution.

10. Conclusion

The decisions that are made as a result of this review (and the other related reviews) will shape the nature of the broadcasting industry in Australia for a generation. At a time when broadcasting is converging with computing and telecommunications, broadcasting will inevitably be redefined.

At this stage it is difficult to predict which services will have the greatest audience appeal, production efficiency and cost effectiveness. By opting to preserve and extend Australia's unique mixed broadcasting economy into the digital age - by a combination of high definition television, multi-channeling, datacasting and enhanced services - the policy framework is in place to enable the full potential of the broadcasting convergence revolution to be realised.

It is important that the national public broadcasters have a presence in each of the new digital broadcasting areas: HDTV, multi-channel and datacasting. The ABC is not an ancillary member of the broadcasting industry in Australia, but a comprehensive, national institution.

The ability of the national public broadcaster to provide multi-channels is important for the ABC, but it will also be important for the long-term future of the industry. As the commercial viability of multi-channel services is highly questionable, if the ABC and SBS do not provide this innovation Australian audiences will be deprived at a time when audiences in other countries are being offered much greater choice. As the commercial viability of multi channels is questionable, the national public broadcasters will provide a valuable service to the industry by testing the market. As the national public broadcasters can only provide services within their Charter they are not, by definition, a commercial threat to the pay television and free-to-air industries.

It is particularly important that the ABC and SBS be granted the right to offer multiple channels. This will enable the public broadcasters to more fully meet their Charter obligations.

The Government is committed to the digital conversion of Australian communications services. To achieve this aim it will be important to provide audiences with incentives to upgrade their receivers. Enabling the national public broadcasters to offer multiple channels will be an important incentive for many early adopters.

In an increasingly globalised and convergent communications environment, the ABC, as Australia's comprehensive national broadcaster, will continue to be a significant player in the evolution, maintenance, preservation and development of Australia's culture and national identity. Its digital television services will be the gateway to the information age for many Australians.

The ABC's role in Australian society and the broadcasting industry stems from both its tradition and its vision. This derives from its history of cultural and political independence, its quality, diversity and innovation in programming, its promotion of distinctively Australian content and its ability to provide services across Australia for all Australians.

By exploiting the full potential of digital technology, the ABC will leverage the long-term investment by Australian taxpayers to provide even greater service and value to audiences in the future.

BRISBANE NEWS ANALYSIS

ATTACHMENT 8

In PDF format in the electronic version supplied

MAINTAINING THE NEWS

A COMPARATIVE ANALYSIS OF NEWS AND CURRENT
AFFAIRS SERVICES PROVIDED BY THE ABC AND THE
COMMERCIAL SECTOR

A REPORT COMMISSIONED BY
THE AUSTRALIAN KEY CENTRE FOR CULTURAL
AND MEDIA POLICY AND
THE AUSTRALIAN BROADCASTING CORPORATION

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The aim of this research project is to examine ABC news and current affairs services on radio and television in comparison with equivalent services in the commercial sector to provide evidence of the ABC's relative performance in terms of comprehensiveness, impartiality and balance. The outcomes of this project enable a better understanding of the cultural value of the services provided by the ABC in the areas examined.



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1.0 INTRODUCTION AND SUMMARY

This research project was commissioned by the Australian Key Centre for Cultural and Media Policy and the Australian Broadcasting Corporation. Its objective was to examine ABC news and current affairs services on radio and television in comparison with equivalent services in the commercial sector to provide evidence of the ABC's relative performance in terms of comprehensiveness, impartiality and balance. The issue of accuracy is also addressed, although the limitations of time have not enabled a comprehensive approach to evaluating the ABC's performance in this regard.

A survey of the provision of news and current affairs on radio and television in the Brisbane market was accompanied by a content analysis of a selection of news and current affairs programming from the ABC's 4QR and *The 7.30 Report*, and the commercial sector's 4BC and Channel 9's *A Current Affair*. The monitoring of this programming continued over two separate weeks, one of which incorporated the handing down of the Federal Budget.

The data supported the view that the ABC's news and current affairs services were essential, and in some cases the sole components of the community's menu of news, information and analysis of public affairs. Among the specific conclusions drawn from the research are the following points:

- Through its various outlets - 4QR, Radio National, PNN and Triple J - the ABC is the only significant provider of current affairs radio in the Brisbane market. It is the largest provider of news and it broadcasts the only wholly locally produced news bulletins.
- The ABC does not provide as much television news and current affairs as the commercial sector and there would be some community benefit in changing this situation. This is because there are significant differences in the kinds of services provided, in story choice and duration, which suggest that the ABC provides the better service. News value preferences for crime and sport dominated commercial television's story selection, while the ABC covered a greater range of topics and accorded a higher importance to the coverage of political issues. In general, the ABC was more likely to cover issues as well as events.
- In TV current affairs, there is a particularly marked difference between the story selection in *A Current Affair* and *The 7.30 Report* in that the former has largely moved away from political coverage and more conventional current affairs, and towards stories presented for entertainment value only. In this context, *The 7.30 Report* remains the only provider which devotes the entire program to current affairs.

The comparison with 4BC's current affairs established that 4QR's service is conclusively more comprehensive.

- Over most of the programming surveyed, the ABC has been at least twice as successful as its commercial competitors at preserving

balance in its treatment of stories which require such balance. This is evident in the proportion of balanced stories and in the high levels of actuality inserts in ABC radio reports.

- Since independence of news gathering influences the quality, credibility and impartiality of the news, the ABC is better equipped than its commercial competitors to deliver high-quality, independent, accurate and impartial reports. This is borne out by the results of the survey.
- In the Budget coverage sampled, while both services performed well, the ABC's coverage was more extensive, with it devoting almost double the proportion of its radio news bulletins to the issue. In the comparison of current affairs coverage, the ABC was also significantly more comprehensive and balanced in both radio and television.
- The survey of news and current affairs on radio and television found no evidence to support recent public claims that the ABC's programming revealed bias towards indigenous and environmental issues.

Overall, the results establish that the ABC provides the most comprehensive service for radio news and current affairs, the most independent service for radio and television news and current affairs, and the most impartial and balanced service across all programming surveyed. In some cases the differentials were so dramatic as to indicate that, without the presence of the ABC, there would be no provision of a socially responsible, comprehensive news and current affairs service to the Australian community.

2.0 COMPREHENSIVENESS: RADIO-

The issue of comprehensiveness is approached in two broad ways. First, the research maps the range of services provided by the ABC and the commercial sector on radio in the Brisbane market. Second, it compares the choice of stories, the duration of stories, and the selection preferences evident in the results of a two-week survey of specific news and current affairs programs broadcast by the ABC's 4QR and the commercial sector's 4BC. The methodology for this survey can be found in Appendix 1.

2.1 PROVISION

The aim of the first step in the research project was to establish an overview of the provision of news and current affairs programming within the Brisbane market by the ABC and commercial radio. The results demonstrated very clearly that the elimination of the current services supplied by the ABC would drastically reduce the supply of information available through news and remove current affairs altogether from radio schedules.

2.1.1 RADIO NEWS

The survey revealed that within commercial sector 4BC provides by far the greatest amount of time to news (over 18 hours per week). There is little difference between the amount of news broadcast by the next highest scoring commercial stations (4BH and 4KQ, who broadcast in excess of nine and eight hours respectively). The ABC's 4QR is the largest provider of news in the market (over 20 hours per week).

Of the nine radio stations broadcasting in Brisbane, only one commercial station (4BC) has a newsroom devoted solely to its use and even this station networks a proportion of its non-prime time news from 2UE in Sydney. The two contemporary music FM stations (B105 and Triple M) share a newsroom, QFM shares with 4BH and 4TAB relays from 4KQ. Completely locally produced news is thus absent from the commercial sector: as Table 1 indicates, all the commercial stations use locally produced composite bulletins as their major form of news.

The ABC metropolitan station, 4QR, is the sole provider of locally produced news but even so, according to the categories used in this study, it only produces one hour and 40 minutes locally per week. 4QR relies on national relays and locally produced composites for the remainder. Although there is evidence that 4QR foregrounds local stories in its composite bulletins, there is a clear need for more locally produced news than is currently supplied to the Brisbane market.

Significant is the difference between the news service provided by the commercial youth stations and the ABC's Triple J. While all three stations' bulletins are networked nationally, Triple J provides 20 per cent more air time to news than is provided by B105 and almost 30 per cent more than Triple M.

Table 1: News Radio (amount broadcast/week)

| Station * | Total Time/week | Comprising |
|----------------------------|-----------------|--|
| B105 | 4 hrs 4 mins | All LPCB* (shares newsroom with Triple M) |
| 4BC | 18 hrs 55 mins | 14 hrs 25.5 mins of LPCB + 4 hrs 27.5 mins of RCB from 2UE |
| 4QR | 20 hrs 50 mins | 1 hr 40 mins of LP 6 hrs, 40 mins RR 12 hrs 30 mins LPCB |
| 4KQ | 8 hrs 21 mins | All LPCB |
| 4TAB | 1 hr 45 mins | All bulletins relayed from 4KQ |
| QFM | 5 hrs 56 mins | All LPCB (shares newsroom with 4BH) |
| Radio National | 6 hrs 51 mins | 54 mins LP 3 hrs 57 mins RP 2 hrs LPCB |
| Today s Easy Listening 4BH | 9 hrs 16 mins | All LPCB (Shares newsroom with QFM) |
| Triple J | 5 hrs 4 mins | All composite bulletins relayed from Sydney |
| Triple M | 3 hrs 30 mins | LPCB |

* LP: locally produced.

RP: relayed program.

LPCB: locally produced composite bulletin.

RCB: relayed composite bulletin.

2.1.2 RADIO CURRENT AFFAIRS

In this area, the differences are very clear, with the ABC's metropolitan station providing almost four times the amount of current affairs programming than its only competitor, 4BC. Importantly, the vast majority of 4QR's current affairs is locally produced: 28 hours per week, from a total of 39 hours per week, is locally produced.

If one were to add to this comparison the services provided by Radio National and PNN, the disparity between the provision by the commercial sector and that by the ABC would be multiplied several times over. It is absolutely clear that the ABC - through Radio National, 4QR, PNN and Triple J - is the only significant provider of current affairs radio.

In the youth sector, neither B105 nor Triple M presents any current affairs; Triple J presents 15 hours per week and thus performs a very useful service supplying% market that is rapidly moving away from conventional news and current affairs programs.¹

Table 2: Current Affairs Radio

| Station | Total Time/week | Comprising |
|----------------|-----------------|--|
| 4BC | 10 hrs | 5 hrs LP 5 hrs RF |
| 4QR | 39 hrs 50 mins | 11 hrs 50 mins per week RR 28 hrs/week LP |
| Radio National | 30 hrs 45 mins | All RR |
| Triple J | 15 hrs | All RP |
| Triple Z | 15 hrs | All LP community radio |

The second step of the project involves the analysis of the information generated by the survey of ABC and commercial programming outlined in Appendix 1. Drawing upon this information, we can examine a number of factors across the two broadcasting sectors as represented by 4QR (ABC) and 4BC (commercial): the selection of stories by topics, the mix of local, national and international stories selected for coverage, the average duration of stories broadcast, and the news agendas pursued in radio news and current affairs programmes. All of these factors go to the issue of comprehensiveness of service in terms of the range of stories covered, the depth of their treatment, and the sensitivity of the news values employed to contemporary social, economic, cultural and political concerns.

2.2.1 NEWS

Some general trends emerge from the tables which are collected in Appendix 2. As Table A1 establishes, 4QR gives much greater attention to politics (17 per cent in week 1 versus 8.2 per cent, and 39.4 per cent in week 2 versus 22.5 per cent), and much less to crime and sport than 4BC. Table A2 establishes that the average story duration for 4QR is 39 seconds (week 1) and 38 seconds (week 2) per story; average story duration for 4BC is 26 seconds (week 1) and 29 seconds (week 2). Table A3 shows that the mix of stories from both outlets varies greatly over the two weeks so that it is not possible to draw conclusions about organised preferences for national or international stories, although 4QR scores lower in the international category both weeks. One significant factor, however, is the high proportion of local stories covered by 4QR in both weeks (45.2 per cent and 59.8 per cent against 4BC's 26.2 per cent and 34.2 per cent).

2.2.2 CURRENT AFFAIRS

In current affairs, national stories dominated both sectors' selections. 4QR was well below 4BC in local coverage but significantly above in international stories. In both weeks surveyed, 4QR ranked local stories as the least important (in terms of the percentage of the program devoted to them), while 4BC ranked international stories the lowest.

There was a dramatic disparity in the total number of stories covered by each station, however: 4BC covered 57 stories in week 1 and 56 in week 2, while 4QR covered 99 stories in week 1 and 105 stories in week 2. The disparity in volume is further amplified by the average story duration figures (Tables A5 and A6), which have 4QR at 3 mins 43 seconds (week 1) and 3 mins 30 seconds (week 2) per story and 4BC at 2 mins 19 seconds and 2 mins 29 seconds per story.

The figures here do not support any strong conclusions about differences in story mix, but do indicate that 4QR's coverage is both more extensive and detailed across the board.

2.2.3 NEWS AGENDAS IN RADIO NEWS AND CURRENT AFFAIRS

The appropriateness of the stories covered in radio news and current affairs demands some comment. Major political and social issues occupied the majority of time in both weeks surveyed, with crime and sport being the other popular categories.

Given recent accusations of a bias in ABC story selection towards the environment and indigenous issues, it should be acknowledged that the ABC did give greater coverage to both these categories of story than did 4BC. However, it must also be noted that they constituted extremely minor components of the program and were far from dominating programs. In all cases, it could be argued, the percentage of programming devoted to these issues is below their current social, economic, and cultural significance.

Over the two weeks, 4BC devoted an average of 0.5 per cent of its news time per week to environmental stories, no news time to indigenous issues, and no current affairs time at all to either category. 4QR devoted an average of 3.05 per cent of its news time and 5.1 per cent of its current affairs time to indigenous issues; an average of 8.35 per cent of 4QR's news and 2.2 per cent of 4QR's current affairs was devoted to environmental stories. Given the fact that environmental news at the time included the development of Port Hinchinbrook and that ATSI issues were raised by stories dealing with the Federal Budget, the appointment of Bill Hayden as a mediator over the Century Zinc mine, and statements by the Governor General about reconciliation, 4BC's ignoring of such issues seems far more questionable than the ABC's airing of them. At the very least, it is reasonable to argue that indigenous issues are not over-represented if they constitute 3-5 per cent of the national broadcaster's news and current affairs coverage, and that environmental issues are entitled to 2-8 per cent of the nation's attention.

Finally, in relation to both radio news and current affairs, it should be noted that there is very little evidence of the tabloidisation that has marked television current affairs in recent years. Very little of the programming on either commercial or ABC stations was solely entertainment based, aimed at generating audiences in the manner of prime time television.

2.2.4 BUDGET COVERAGE

The first week of the survey was the week the Budget was handed down, and provided an opportunity to see how well the two stations handled this event.

4QR devoted almost twice the proportion of its news broadcasts to the Budget (21.7 per cent) that 4BC allocated (11.8 per cent). Despite the importance of the Budget, crime stories were still the dominant topic for items in the 4BC news over the week (21 per cent). In current affairs programming, the Budget dominated both outlets, with 4BC devoting 45.7 per cent of its time to the issue and 4QR devoting 35.9 per cent. A difference emerges, however, in that 4QR concentrated on social, economic and political issues directly related to the Budget (30 per cent), arguably the most important aspects, while 4BC spent the majority of its coverage (24 per cent) on the demonstration at Parliament House. The 4QR stories made consistently greater use of actuality inserts (either actual interview material placed within journalists voice reports or full, often live, interviews with the journalist), while 4BC made use of some grabs which seem to have been taken from the ABC television coverage of the night before.

It is probably invidious to suggest which was the better coverage since the coverage from both outlets was responsible and significant. 4QR's news coverage, however, was more extensive, and its story selection in current affairs more justifiable.

2.2.5 SUMMARY

When combined with the contributions of other ABC outlets - Radio National, PNN and Triple J - the ABC is the only significant provider of current affairs radio in the Brisbane market. It is the largest provider of news and the only provider of locally produced news. The comparison with 4BC's current affairs revealed a dramatic disparity in the number of stories covered and the average story duration, establishing that the ABC service is conclusively more comprehensive. In the sample made of the Budget coverage, while both news services performed well, the ABC's coverage was more extensive, devoting almost double the proportion of its bulletins to the issue. The survey of news and current affairs found no evidence to support recent public claims that the ABC's programming revealed bias towards indigenous and environmental issues.

3.0 COMPREHENSIVENESS: -TELEVISION

3.1 PROVISION

As with the radio survey, the aim of this part of the research was to establish the provision of news and current affairs programming within the Brisbane market by ABC and commercial television. The results for television are different to those for radio, in that the ABC is not the largest provider of programming in either news or current affairs. With television, however, there is a significant difference between the kinds of services provided under these categories. The effects of tabloidisation, in particular, are relevant when we come to deal with the issues of story choice and story duration.

3.1.1 TELEVISION NEWS

All commercial channels provide more total time for the news than the ABC. Channel 10 produces the most (12 hours per week), with Channel 2 producing 6 hours and 35 minutes per week. This may reflect differences in resources as well as in programming choices, and there may well be an inverse relation between quality and quantity in this area. There is no wholly local bulletin on any channel, all outlets relying on a mixture of locally produced composite bulletins and relayed composite bulletins.

Table 3: News Television

| Channel | Total Time/week | Comprising |
|---------|-----------------|---|
| Ch 2 | 6 hrs 35 mins | 3 hrs 30 mins LPCB 3 hrs 5 mins RPCB |
| Ch 7 | 8 hrs 30 mins | 3 hrs 30 mins LPCB 5 hrs RPCB |
| Ch 9 | 8 hrs 40 mins | 3 hrs 30 mins LPCB 5 hrs 10 mins RCB |
| Ch 10 | 12 hrs | 6 hrs LPCB 6 hrs RCB |
| SBS | 3 hrs 30 mins | RCB from Sydney |

3.1.2 TELEVISION CURRENT AFFAIRS

In this category, Channel 9 is the largest provider at 6 hours 30 minutes per week, with Channel 2 coming second with 5 hours 40 minutes per week. Channel 7 is third, but it is significant that it broadcasts the only

locally produced current affairs show in Brisbane. Channels 9, 10 and SBS rely entirely on national relays for their current affairs, Channel 7 uses relays for 1 hour 35 minutes of its output, and Channel 2 uses relayed composite programs.

Table 4: Current Affairs Television

| Channel | Total Time/week | Comprising |
|---------|-----------------|-------------------------------------|
| Ch 2 | 5 hrs 40 mins | All RCB |
| Ch 7 | 4 hrs 5 mins | 2 hrs 30 mins LP 1 hr 35 mins RP |
| Ch 9 | 6 hrs 30 mins | All RR |
| Ch 10 | 1 hr | All RP |
| SBS | 3 hrs | All RP |

3.2 STORY CHOICE, STORY MIX, STORY DURATION

As was the case with radio, this section draws on the information generated by the survey of ABC and commercial programming outlined in Appendix 1. Below we review a number of factors across the two broadcasting sectors as represented by comparisons between Channel 2 and Channel 9 evening news, and between *The 7.30 Report* and *A Current Affair*: the selection of stories by topics, the mix of local, national and international stories selected for coverage, the average duration of stories broadcast, and the news agendas pursued in television news and current affairs programmes. The tables for these can be found in Appendix 2.

3.2.1 TELEVISION NEWS

A difference picked up in the radio comparison is even more marked with television: the dominance of crime stories within commercial news bulletins. Crime stories accounted for 26.3 per cent of 9 News in week 1 (as against 10.1 per cent for the Budget), and 22.6 per cent in week 2. Channel 2 ran 16.4 per cent on crime in week 1 and only 4.7 per cent in week 2. Politics consistently took up a larger proportion of the ABC bulletin than of Channel 9's news: an average of 21 per cent for the ABC over the two weeks (or 28.4 per cent if we include the Budget), against an average of 12.3 per cent (or 18.35 per cent if we include the Budget). Sport and entertainment were slightly higher in the Channel 9 bulletins, business and finance slightly higher in the Channel 2 bulletins, and the treatment of sport occupies a significantly greater proportion of television bulletins than on radio.

The figures on average story duration (Tables A5 and A6) in television news has Channel 9 producing 128 stories at 63 seconds per story in week 1, and 121 stories at 67 seconds per story in week 2. Channel 2

screens fewer stories but gives them more time, producing 123 stories at 86 seconds per story in week 1 and 114 stories at 94 seconds per story in week 2. Story mix figures (Tables 7,8,9, and 10) do not reveal strong or consistent differences between the providers other than Channel 9's high local content: 47.4 per cent in week 1 and 49 per cent in week 2, as against Channel 2's 23 per cent in week 1 and 37.4 per cent in week 2.

3.2.2 TELEVISION CURRENT AFFAIRS \

The most startling difference between the two current affairs programs was the proportion of time devoted to politics. Over the two weeks, the average proportion of *The 7.30 Report* spent on politics if we include the Budget coverage was 61.5 per cent; the average for *A Current Affair* was 18.3 per cent. If we exclude the Budget coverage, the figures are 25.5 per cent (ABC) versus 8.3 per cent (Channel 9).

Average story duration was similar, with the major difference in week 1 due to the extra Budget special run by *The 7.30 Report*. This special is also responsible for the program scoring nil in the local stories category for that week. Both channels, though, reveal the influence of networking in their strong preference for national stories.

Finally, the survey collected data on the proportion of current affairs stories which were generated by the current news agenda (Tables All and A12), rather than generated inhouse by the program for their entertainment value. This is in response to frequently repeated claims that commercial current affairs, in particular, no longer does what used to be considered standard current affairs - background and analysis on issues in the news. This factor goes to the comprehensiveness and the social usefulness of the service provided and is extremely revealing. Averaged over the two weeks, 28.5 per cent of *A Current Affairs* were not related to the current news agenda and must be called infotainment. *The 7.30 Report* recorded a score of only 3.2 per cent. This is not unexpected, but is a dramatic sign of the shift in the genre of current affairs on commercial television away from the news agenda and away from political issues in particular.

3.3 NEWS AGENDAS FOR TELEVISION NEWS AND CURRENT AFFAIRS

The survey highlights emerging differences in the principles of selection between the ABC and commercial news and current affairs. These differences record the commercial channels news services moving away from politics and some social issues in order to cover crime and sport. With current affairs, the trend is both more dramatic and of greater social significance. *A Current Affair* is now spending almost a third of its time generating its own entertainment-based stories and could not be regarded as providing anything like comprehensive coverage of even the most limited agenda of national political, economic or social issues.

On the question raised in the earlier discussion of news agendas in radio, it is worth noting the coverage of indigenous and environmental issues within news and-current affairs on television. In the period surveyed, ABC news averaged 3 per cent of its bulletin on indigenous affairs, and 4.2 per cent on environmental issues; Channel 9 news averaged 0.5 per cent on indigenous issues and 2 per cent on environmental issues. In current affairs, Channel 2 averaged 0 per cent on indigenous affairs and 2.5 per cent on environmental issues; Channel 9 averaged 0.3 per cent on indigenous affairs and 2.1 per cent on environmental issues. These figures should put to rest any residual accusations of the privileging of these topics within the ABC, and may rather indicate the need for them to be taken more seriously Within the commercial sector.

3.4 BUDGET COVERAGE

As with radio, the ABC provided a more extensive and focused coverage of the Budget on television. A total of 13.7 per cent of its news in week 1 was devoted to the Budget, with the majority of the coverage dealing directly with the Budget rather than with the demonstration outside Parliament House. Channel 9 s news gave 10.1 per cent to the Budget, but the majority of this coverage was devoted to the demonstration.

In current affairs coverage, the differential is massive. A total of 72.1 per cent of the ABC s coverage was devoted to the Budget, as against 20 per cent of *A Current Affair*. The differing approaches to current affairs is evident in the strategies used by each program. The *7.30 Report* ran extended programs on the Budget night, and on the Budget reply night (Budget night approximately 90 minutes, and the reply night, an hour). *A Current Affair* ran a question and answer session with a studio audience asking their opinion on the Budget, and an interview with the Treasurer. Only one of these approaches could be called comprehensive, concerned with canvassing as wide a range of opinion as possible.

3.5 SUMMARY

The ABC does not provide as much television news and current affairs as the commercial sector and the survey suggests this should be cause for community concern. This is because there are now quite significant differences in the kinds of services provided and in story choice and duration. News value preferences for crime and sport dominated commercial television s story selection, while the ABC covered a broader range of topics and accorded a higher importance to the coverage of politics. The coverage of events rather than of issues is emerging as a difference between the news values of commercial and ABC broadcasters.

In current affairs, there is marked difference between *A Current Affair* and *The 7.30 Report* in that the former has largely moved away from political coverage and more conventional current affairs, and towards stories presented for entertainment value only. In this context, *The 7.30 Report* remains the only provider which devotes virtually the entire program to current affairs.

4.0 IMPARTIALITY AND BALANCE

Demonstrating impartiality or defending against charges of media bias are difficult tasks. Individual readings of the same news item or current affairs story can be diametrically opposed, depending on the opinions and attitudes each individual reader brings with them. In order to generate some hard evidence which will help, establish the ABC's relative impartiality, two factors have been tracked through the materials generated by the comparative survey.

The first factor is the maintaining of balance. A fundamental issue in the discussion of the media's representation of social and political issues is the inclusion of competing points of view. Are all interested parties given the opportunity to put their view? Competing points of view must be balanced against each other to allow the viewer or listener to form an independent judgement. The survey materials have been examined to determine the extent to which those stories which should be balanced actually are.

A second, and even more elusive, factor in maintaining the impartiality and accuracy of the news is the relative independence of the organisation producing it. In general, the ABC's institutional independence, separate both from government and from business, is a crucial attribute which continues to protect it against claims of undue influence. More specifically, the independence of the ABC's news and current affairs service derives from its maintenance of a network of foreign and regional correspondents which reduces their reliance on other news agencies. The ABC's employment of a large (but decreasing) network of local radio reporters differentiates its news-gathering structures from those of the commercial sector. That this is a deliberate defence of the commitment to independence is evident in the ABC's declining to use AAP for domestic stories. Some comments, then, will be made about this factor as well, by examining the sources of broadcast news and current affairs.

4.1 BALANCE

For the purposes of this exercise, balance is defined as the range of viewpoints represented in the story. If the story left out social or political viewpoints that might reasonably be expected to be covered, then the story was considered unbalanced. However, a story was considered balanced if other stories in the same bulletin provided an appropriate range of competing viewpoints, even if the story by itself was unbalanced. In news, the journalist can provide such viewpoints through direct grabs from various speakers or through indirectly quoting such opinions in their stories. In current affairs, however, it is also legitimate to regard devil's advocate questioning as allowing a range of opinions to be represented.

It should be pointed out that the analysis has been extremely conservative, relying on explicit canvassing of other points of view rather than any more subtle or implicit process. Further, it is not uncommon for stories to be balanced in subsequent rather than in

single bulletins. Given such considerations, the figures likely to err on the side of over-estimating the number of stories which have not been formally balanced.

Obviously, for some stories, a range of opinions is not usually required (e.g. a story saying that fire had destroyed a building; results of sporting matches, etc.). The commercial stations run a lot more not applicable stories, because of their tendency to chase spot news - fires, crimes, etc. On radio, in particular, many of their stories are so short they often don't allow much more than a very brief statement of bare facts, without time for expression of competing opinions. Questions of balance only come significantly into play when journalists are critiquing or examining the processes and assumptions behind events and actions. It may be appropriate to consider the ratio of not applicables as an indication of whether journalists are covering *events* or covering *issues*.

The figures for this factor can be found in Appendix 2, Tables A13-A16.

4.1.1 RADIO

The following points are derived from looking at the figures which exclude the not applicable stories, only tabulating stories where balance is an important issue.

With radio news, the proportion of unbalanced stories broadcast by 4BC is very high, averaging at 43.2 per cent over the two weeks. 4QR averaged 28.2 per cent. In current affairs, the pattern is repeated, with 4BC averaging 42.2 per cent and 4QR averaging 13.8 per cent.

From these figures, there is absolutely no basis for the common accusation that the ABC's news and current affairs reveal bias, since the ABC is demonstrably more committed to the pursuit of a balanced coverage than its closest commercial competitor.

4.1.2 TELEVISION

Television news across both sectors is generally more successful at balancing its stories than is radio news. An average of 24.7 per cent of applicable Channel 9 news stories were unbalanced, but again this is significantly higher than Channel 2's average score of 8.6 per cent. With current affairs, the average over the period surveyed for *A Current Affair* was 18.8 per cent, and for *The 7.30 Report* it was 1.4 per cent.

As was the case with radio, the ABC is providing a much more impartial and balanced service in television news and current affairs than its commercial competitors.

4.1.3 SUMMARY

The ABC is performing a much more balanced and impartial role than its commercial competitors in the news and current affairs programming surveyed. Over most of the programming surveyed, the ABC has been at least twice as successful as its commercial competitors at preserving balance in its treatment of stories which require balance.

4.2 STORY SOURCE

The attribution of sources is a very murky area in media practice generally, but particularly in radio. Many commercial radio stations use BBC stories without attribution, but with permission. Indeed, foreign-sourced stories are very difficult to detect if they are, as often happens, used as actuality material within a local network report. Domestically, it has become routine for both radio and television news to borrow from key competitors programs such as *AM, PM, Face the Press* and *Sunday* - although usually with attribution. However, in this survey we found a number of occasions where short grabs seemed to have been lifted off, for instance, *The 7.30 Report's* Budget special without attribution by commercial radio. In one case (3 September), the researchers are convinced that 4BC used a section from the ABC's Fran Kelly's exclusive interview with Senator Colston as an unattributed insert within a network reporter's voice report.

The tables for this factor can be found in Appendix 2, Tables A17-A21.

4.2.1 RADIO

The most notable feature of the figures with radio is the high incidence of overseas agency-sourced stories for 4BC in news. Averaging just under 60 per cent, this is a high percentage. Given the level of local reports (11.8 per cent and 18.9 per cent), the possible level of independence is very low. In comparison, 4QR derives the vast majority of its stories from its own correspondents.

Finally, 4BC's current affairs depends on the host for more than half its content (averaging 58.3 per cent over the two weeks surveyed), reducing the capacity for introducing competing points of view and making minimal use of actuality (an average of 8.5 pieces of actuality per hundred news stories, compared with 4QR's 118.5 per 100 stories). In comparison, 4QR's host only dealt with an average of 19.4 per cent of the stories.

4.2.2 TELEVISION

In television news, there is a significant difference between the ABC's use of its own foreign correspondents, and that of Channel 9. Over the two weeks, an average of 13.8 per cent of Channel 9's stories were sourced to its own foreign correspondent; Channel 2 sourced 33 per cent of its stories to its own foreign correspondent. This may reflect the selection of news stories (there is a lower total number of international stories on Channel 9), but it also indicates the ABC's greater capacity to provide independent readings of foreign affairs.

With current affairs, the patterns are not systematically different over the period of the survey, with two exceptions: the total lack of any foreign correspondent contributing to *A Current Affair* despite the fact that the Iraq/USA fracas emerged over the survey period, and *The 7.30 Report's* exceptionally high score for items dealt with by the host in week 1. However, *The 7.30 Report's* score is primarily the result of the host performing a large number of live interviews as part of the extended Budget special.

4.2.3 TALKBACK

Talkback was excluded from this project, but there is some published research which deals with the notion of impartiality, accuracy and objectivity and which is worth noting in the context of this report's findings. In a comparison of two talkback programs in Perth in 1984, conducted by two researchers from the University of Western Australia, followed up by several studies by Stephen Mickler in the 1990s,² the ABC presenter's style was differentiated from that of the commercial talkback host by the following behaviours:

- allowing callers to think through their arguments
- avoiding the promotion of his own point of view
- reservation in providing positive or negative feedback to the callers
- challenging or ignoring mis-informative comments

(Mickler, p.10).

Within the context of an assessment of the comprehensiveness and impartiality of the ABC's news and current affairs program, these observations seem relevant.

4.2.4 SUMMARY

If independence of news gathering does influence the quality and the impartiality of the news, then the ABC is much better placed than its commercial competitors to deliver high quality and impartial reports. Certainly in the area of foreign news, the capacity to generate its own reports from its own reporters insulates the ABC from the danger of simply reproducing, for instance, an American point of view by recycling grabs from CNN.

The difference is most clear in radio, where newsgathering for current affairs is only seriously performed by the ABC, but it is also increasingly clear in the lack of foreign correspondents employed by commercial television.



5.0 ACCURACY

Given the time frame and resources for this project, it is not able to directly assess the accuracy of news and current affairs reporting. The only way to assess this comprehensively is by referring stories back to the sources, checking the reports with those who feature in the stories or who supplied the information.

The inclusion of information about the incorporation of actuality material (Tables A21, A22), however, does provide some useful pointers to the differing levels of accuracy between the two sectors. Within radio, in particular, the use of actual interview material inserted within voice reports is regarded as a prime indicator of the quality of the news gathering, and of the accuracy and authenticity of the report. The research discovered quite large differentials in the incidence of actuality and, as noted earlier, significant questions about the unattributed sources of some material used in commercial radio.

5.1 RADIO

Radio revealed the greatest difference in the incidence of actuality grabs between the commercial and ABC stations. Expressed as the number of grabs per 100 news stories, ABC scored an average of 26 against 4QR's 56. In current affairs the disparity was gross: 14.9 for 4BC, 117 for 4QR. This must represent a major difference in the accuracy, comprehensiveness and overall quality of the services compared. While there is not a great deal of difference in the news values, there is a substantial difference in the resources devoted to covering stories and these figures should be seen in conjunction with the amount of stories 4BC covered with the host rather than with a journalist.

5.2 TV

The picture is slightly different with television. Both networks were very capable at providing actuality material for their bulletins and their current affairs programs, but Channel 9 was significantly ahead of Channel 2 in both cases. This reflects Channel 9's admirable effectiveness at gaming actuality footage, but also reflects other factors picked up earlier - their preference for covering events rather than issues and their greater use of overseas agency footage.

5.3 SUMMARY

According to the measures adopted by this study, the ABC's use of actuality to guarantee accuracy is substantially higher than its commercial competitor in radio, and comparable with its commercial competitor in television.

6.0 CONCLUSION

Over the course of this year, and frequently in the past, the ABC's news and current affairs programming has been subject to repeated accusations of bias, excessive liberalism and sectarianism. While such complaints may emerge from particular interests and thus come with the territory, it is incumbent upon a nationally funded broadcaster to routinely survey its performance in order to assess their validity.

This project has done this by comparing the service provided by the ABC with that of its major competitor in radio and in television. When such cross-sectoral comparisons occur, they reveal differentials in provision and resources; it is not surprising that the ABC is not the largest provider of television news and current affairs. Notwithstanding this fact, the results establish that the ABC provides the most comprehensive service for radio news and for current affairs in both media; it provides the most independent service for radio and television news and current affairs; and it produces the most impartial and balanced performance across all programming surveyed. In some cases the differentials are so dramatic as to indicate that, without the presence of the ABC, there would be no provision of a socially responsible, broadly based news and current affairs service to the Australian community. In the crucial areas of radio and television current affairs, the evidence supports this conclusion overwhelmingly.

NOTES

- ¹ Jason Sternberg, *Children of the Information Revolution: Generation X and the Future of Journalism*, *CQU Working Papers in Communication and Cultural Studies*, No. 2, 1995, pp. 45-60.
- ² Taylor, A., Hodson, S. & Trigger, D. *Comparison of Talk-Back Radio Presenter Styles*, Department of Anthropology, University of Western Australia, July 1990; D. Trigger, *Everyone's Agreed: The West is All You need*, *MIA*, 75, February 1995; Stephen Mickler, *Gambling on the First Race: A Comment on Racism and Talkback Radio - 6PR, the TAB and the WA Government*, Louis St John Johnson Memorial Trust Fund, Centre For Research in Culture and Communication, Murdoch University, 1992.

METHODOLOGY

There were two steps to this project. The first tabulated the total amount of news and current affairs programming available to the Brisbane market on radio and television. In producing this total, certain factors had to be considered.

- ◆ Total figures include weather and traffic reports, which are often folded into the news.
- ◆ Much of 4BC's non-prime time news service is networked from 2UE in Sydney but all of its news has been included in the total figure.
- ◆ Radio talkback has been excluded. This is partly due to the scale of the task if it had been included, but it also restricts what is regarded as current affairs. Figures collected reflect what stations themselves regard as current affairs: this excludes some magazine formats such as Channel 9's *Today* as well as radio talkback based around personalities' opinions, and what might be called light current affairs. (There is previously published research on talkback, however, referred to in the main body of the report.)

The second step in the survey was to compare the range, comprehensiveness and impartiality of the services provided by the ABC and its primary commercial competitor over a period of two weeks. The weeks chosen included the week of the Budget (August 18-23) and a more typical news week (September 2-8), although this week did include the US attack upon Iraq which possibly skews the sample towards the treatment of international politics.

The programs chosen for the survey were:

| | |
|-------------------------|------------------------|
| Weekdays: Television: | Weekdays: Radio |
| <i>Channel 9 News</i> | <i>4QR 7.30-8.30am</i> |
| <i>A Current Affair</i> | <i>noon-1 pm</i> |
| <i>Channel 2 News</i> | <i>4BC 7.0~8.00am</i> |
| <i>The 7.30 Report</i> | <i>noon-1pm</i> |
| Weekends: Television: | Weekends: Radio |
| <i>Channel 9 News</i> | <i>4QR noon-12.30</i> |
| <i>Channel 2 News</i> | <i>4BC noon-1 2.30</i> |

While the television comparisons in news and in current affairs are equivalent, there was some difficulty in providing an appropriate comparison for current affairs on radio. Since there are virtually no radio current affairs programs outside the ABC, the choice to survey 4BC's 7am-8am slot was guided by the view that this timeslot was the closest any commercial station came to performing the service of current affairs. It is acknowledged, however, that one has only to note the amount of time allocated to this kind of radio programming by the ABC in comparison to the commercials to appreciate the enormous disparity between their respective commitments and thus the level of resources available. It would not be fair to use this comparison alone to draw highly negative inferences about the performance of 4BC.

The survey of the programming was used to extract a number of factors:

- ◆ *story duration* (the length of coverage provided to each story);
- ◆ *stay topic* (the range, variety and patterns of concentration in the choices of stories);
- ◆ *story mix* (the local, the national, the international);
- ◆ *story source* (whether it was drawn from the station's own correspondent, a network correspondent, a news agency, etc.);
- ◆ *story balance* (whether the story canvassed a sufficient range of competing perspectives to avoid accusations of bias);
- ◆ *story's relation to the news agenda* (whether it was generated as an item of news, or simply for its entertainment value).

Once implemented, the survey revealed that it was often very difficult to nominate the source of a story. Not all reports nominated whether the report was a network or a local story, and not all reports acknowledged the use of foreign agencies. The BBC, in particular, has been subject to a level of unauthorised borrowing and not all those station authorised will nominate the source during the story. Similarly, ABC television coverage of the Budget, Channel 9's *Sunday* interviews with politicians, and Channel 10's *Face the Press* all provide sound grabs for radio which are not always acknowledged. The intention behind examining this factor is to gain some sense of the degree of independence of the news or current affairs report. We came to the view that another means of assessing this was to note the amount of actuality run in the bulletin. So this factor has also been included, and it does pick up significant differences.

The research has generated detailed data on the stories presented over the periods surveyed. This data has been used to develop summary tables which compare the ABC's performance and service with that of its commercial competitors. The tables are collected in Appendix 2.

TABLES

All figures in all tables are rounded off to one decimal point, and so not all figures add to an even 100 per cent.

Time Allocated for News and Current Affairs

Some notes on the story topic categories for Tables A1-A4 are required.

Given the high proportion of stories on the Budget, and the intention to focus on the coverage of this event, this category is separated from the broader category of politics .

In the current affairs figures, coverage of crime has been divided into general crime and courts (the latter refers to issues such as John Elliott/NCA or the Supreme Court ruling that tax must be paid on interest owed on compensation payments; the former refers to issues about general policing, kidnappings, robberies, murders and so on).

Information covers such items as the weather, headline summaries, traffic reports, surf reports, Lotto results, John Schluter's Back to Basics , Mimi Macpherson's Whalewatch report, and so on.

The comment category refers to John Miller's opinion segment which takes up about 3 minutes of 4BC's midday news.

Social issues include health, education, child welfare and so on.

Entertainment includes celebrities, royalty, recreational activities and the mass media.

Previews refers to the amount of time previewing what will be coming up next in the programme.

Comedy refers to the comedy segment that ends Friday night's *A Current Affair*.



**Table A1:
Week 1. Television and Radio News**

| Week 1 | 4BC (% of time) | 4QR (% of time) | Ch 2 (% of time) | Ch 9 (% of time) |
|-----------------------|-----------------------------------|----------------------------------|--------------------------------|------------------------------------|
| Budget | 11.8 | 21.7 | 13.7 | 10.1 |
| | (Demo: 4.7 Issues: 7.1) | (Demo: 5.3 Issues: 16.4) | (Demo: 4.1 Issues: 9.6) | (Demo: 5.2 Issues: 4.9) |
| Crime | 21 | 13.9 | 16.4 | 26.3 |
| Politics | (Qld:2.6 Nat: 2.8 Int: 2.8) | (Qld:5.9 Nat: 7.7 Int:3.4) | (Qld:2.5 Nat: 4.4 Int:9) | (Qld:73.9 Nat: 2.2 Int: 0.6) |
| Social Issues | 2.4 | 2.6 | 2.9 | 3.4 |
| Business & Finance | 4.1 | 4.2 | 4.1 | 1.7 |
| Industrial Affairs | 0.3 | 7.6 | 1.3 | 3 |
| Environ- ment | 0.8 | 4.7 | 3.8 | 3.9 |
| Indigenous | Nil | 4.4 | 3.4 | Nil |
| Entertain- ment | 1.6 | 2 | 3.8 | 6.7 |
| Sport | 20.3 | 13.6 | 23.6 | 24.9 |
| Information | 17.8 | 5.8 | 11.7 | 10 |
| Comment | 9.6 | | | |
| Others | 2.1 | 2.6 | 2.5 | 3.1 |

**Table A2:
Week 1. Television and Radio Current Affairs**

| Week 1 | 4BC (% of time) | 4QR (% of time) | Ch2 | Ch 9 |
|--------------------------|--|---|---|--|
| Budget | 45.7 (Demo: 24 Issues: 21.8) | 35.9 (Demo: 5.8 Issues: 30) | 72.1 (Demo: 9.5 Issues: 62.7) | 20 (Demo: 6.5 Issues: 13.5) |
| Crime | 12.4 (Gen crime: 8.5 Courts: 3.8) | 14.9 (Gen crime: 4.5 Courts: 10.4) | 9.5 (Gen crime: 2 Courts: 7.4) | 16:Q Gen crime: 3.2 Courts: 13.7) |
| Politics | (Qld:Nil) Nat: 3.2 Int: 0.4) | 19.3 (Qld: 0.1 Nat: 9.1 Int: 10.1) | (Nat:4.4) | Nil |
| Social Issues | 0.8 | 2.6 | 5.4 | 30.8 (Health: 12.9 Others: 17.8) |
| Business & Finance | 11.1 | 3.8 | 2.2 | 3.9 |
| Industrial Affairs | Nil | 4.1 | Nil | Nil |
| Environ- ment | Nil | 2 | Nil | Nil |
| Indigenous | Nil | 4.1 | Nil | Nil |
| Entertain- ment | 5.4 | 3.7 | 5.3 | 7 |
| Sport | 11.3 | 1.4 | Nil | 4.1 |
| Information/ Previews | 6.9 | 1.7 | 1 | 6 |
| Comedy | Nil | Nil | Nil | 1.9 |
| Others | 2.9 | 6.6 | Nil | 9.5 |

**Table A3:
Week 2. Television and Radio News**

| Week 2 | 4BC (% of time) | 4QR (% of time) | Ch 2 | Ch 9 |
|--------------------|---|--|---|---|
| Budget | 2.3 (Demo: 0.6 Issues: 1.8) | 4.2 (Demo: 1.5 Issues: 2.7) | 1.9 (Demo: nil Issues: 1.9) | 2 (Demo: 0.9 Issues: 1) |
| Crime | 14.5 | 9.9 | 4.7 | 22.6 |
| Politics | 22.5 (Qld: 6.9 Nat: 2.5 Int: 13) | 39.4 (Qld: 17.2 Nat: 6.8 Int: 15.3) | 29.3 (Qld: 5.8 Nat: 4.4 Int: 19.1) | 17.9 (Qld: 4.2 Nat: 2.1 Int: 11.5) |
| SocialIssues | 2.9 | 4.6 | 5.8 | 4 |
| Business & Finance | 4.2 | 6.1 | 6.8 | 0.3 |
| Industrial Affairs | 6.2 | 9 | 3.9 | 4.8 |
| Environment | 0.2 | 4 | 4.3 | Nil |
| Indigenous | Nil | 1.7 | 2.7 | 1.1 |
| Entertainment | 1.3 | 1.8 | 4 | 4.1 |
| Sport | 20.9 | 12.2 | 22.6 | 30.2 |
| Information | 14.7 | 4.6 | 10.6 | 9.2 |
| Comment | 8.9 | Nil | Nil | Nil |
| Others | 1.4 | 2.4 | 3.4 | 3.7 |

Table A4

Week 2. Television and Radio Current Affairs

| Week 2 | 4BC (% of time) | 4QR (% of time) | Ch 2 | Ch 9 |
|-----------------------|--|--|---|--|
| Budget | Nil | 5.3 (Demo: 1.1 Issues: 4.2) | Nil | Nil |
| Crime | 12.4 | 4.8 | 3.5 | 9.4 |
| Politics | 36.4 (Qld: 17.2 Nat: 6.4 Int: 12.9) | 38.2 (Qld: 0.9 Nat: 15.1 Int: 22.2) | (Qld Ni Nat: 18 Int: 26.7) | 16.6 (Qld: Nil Nat: Nil Int: 16.6) |
| Social Issues | 5 | 16.4 (Health: 8.5 Others: 7.8) | 12.6 (All health) | 16.7 (Health: 7.7 Others: 9) |
| Business & Finance | 8.9 | 6.1 | 8.2 | 12.5 |
| Industrial Affairs | 1.4 | 3.4 | 5.9 | 5 . 2 |
| Environ- ment | Nil | 2.4 | 5.1 | 4.3 / |
| Indigenous | Nil | 5.8 | Nil | 0.7 |
| Entertain- ment | 9.2 | 9.4 | 4 . 4 | Nil |
| Sport | 15.7 | 3.9 | 3.8 | 4.1 |
| Information | 9 | 2 | 1.2 | 8.2 |
| Comedy | Nil | Nil | Nil | 2.1 |
| Others | 2 | 2.4 | 10.7 (Shooters 5.8 (Science 5.1)[| 20.3 |

Table A5:**Week 1. Average Story Duration (rounded to the nearest second)**

| Station | News | Current Affairs |
|---------|---------------------------------|--------------------------------------|
| 4BC | 297 stories at 26 secs/story | 57 stories at 2 min 19 secs/story |
| 4QR | 233 stories at 39 sets/story | 99 stories at 3 min 43 sets/story |
| Ch9 | 128 stories at 63 sets/story | 22 stories at 4 min 40 sets/story |
| Ch2 | 123 stories at 86 sets/story | 40 stories at 5 min 45 sets/story |

Table A6:**Week 2. Average Story Duration (rounded to nearest second)**

| Station | News | Current Affairs |
|---------|---------------------------------|---------------------------------------|
| 4BC | 280 stories at 29 sets/story | 56 stories at 2 min 29 sets/story |
| 4QR | 238 stories at 38 sets/story | 105 stories at 3 min 30 sets/story |
| Ch9 | 121 stories at 67 sets/story | |
| Ch 2 | 114 stories at 94 secs/story | |

NB: For the tables on average story duration, story mix, story source, balance, actuality and infotainment/current affairs, the figures refer to current affairs only (i.e. not information, previews, comment or comedy).

Table A7:**Week 1. Mix of News Stories (% time)**

| Station | Local | National | International |
|---------|-------|----------|---------------|
| 4BC | 26.2 | 37.4 | 36.5 |
| 4QR | 45.2 | 36.8 | 18 |
| Ch9 | 47.4 | 28.1 | 24.4 |
| Ch2 | 23 | 42.7 | 34.3 |

Table A8:
Week 1. Mix of Current Affairs Stories (% time)

| Station | Local | National | International |
|---------|-------|----------|---------------|
| 4BC | 10.6 | 85.3 | 4.1 |
| 4QR | 2.9 | 72.6 | 24.4 |
| Ch9 | 3.7 | 89 | 7.3 |
| Ch2 | Nil | 100 | Nil |

Table A9:
Week 2. Mix of News Stories

| Station | Local | National | International |
|---------|-------|----------|---------------|
| 4BC | 34.2 | 23.7 | 42.1 |
| 4QR | 59.8 | 14.7 | 25.5 |
| Ch9 | 49 | 18.6 | 32.4 |
| Ch2 | 37.4 | 27.1 | 35.2 |

Table A10:
Week 2. Mix of Current Affairs Stories

| Station | Local | National | International |
|---------|-------|----------|---------------|
| 4BC | 39.2 | 42.1 | 18.8 |
| 4QR | 8.2 | 62.3 | 29.5 |
| Ch9 | 11.5 | 69.9 | 18.5 |
| Ch2 | 4.9 | 67.7 | 27.4 |

NEWS AGENDAS OF CURRENT AFFAIRS PROGRAMS

Table A11:
Week 1. Percentage of Stories Generated from News Agenda

| | News | Infotainment |
|-------------------------|------|--------------|
| 4BC | 91.2 | 8.8 |
| ABC | 93.9 | 6.1 |
| <i>A Current Affair</i> | 72.7 | 27.3 |
| <i>7.30 Report</i> | 97.5 | 2.5 |

Table A12:

Week?. Percentage of Stories Generated from News Agenda

| Station | News | Infotainment |
|-------------------------|------|--------------|
| 4BC | 91.1 | 8.9 |
| ABC | 96.2 | 3.8 |
| <i>A Current Affair</i> | 70 | 30 |
| <i>7.30 Report</i> | 96.3 | 3.7 |

NB: It is worth noting that the infotainment figure for *A Current Affair* would be appreciably higher if it included information, preview and comedy segments as well.

Table A13:

**Week 1. Balanced vs. Unbalanced News Stories
(% number of stories)**

The percentages for balanced/unbalanced only (i.e. if you subtracted all the not applicables and considered only the balanced and unbalanced stories) are in square brackets.

| Station | Balanced | Unbalanced | Not applicable |
|------------|----------------|---------------|----------------|
| 4BC | 14.1 [60.9] | [3Z] | 76.8 |
| 4QR | 37.8 [71] | 15.4 [29] | 109 |
| Ch9 | 18.8 [70.6] | 7.8 [29.4] | 73.4 |
| Ch2 | 30.9 [88.4] | 4.1 [11.6] | 65 |

Table A14:

Week 1. Balanced vs. Unbalanced Current Affairs Stories

| Station | Balanced | Unbalanced | Not applicable |
|------------|----------------|-----------------|----------------|
| 4BC | 28.1 [48.5] | 29.8 [51.5] | 42.1 |
| 4QR | 60.6 [82.2] | 13.1 [17.81] | 26.3 |
| Ch9 | 45.5 [62.5] | 27.3 [37.51] | 27.3 |
| Ch2 | 85 [97.1] | 2.5 [2.9] | 12.5 |

Table A15:**Week 2. Balanced vs. Unbalanced News Stories**

| Station | Balanced | Unbalanced | Not applicable |
|---------|-----------------|-----------------|----------------|
| 4BC | 10.7 [52.6] | 9.6 [47.4] | 79.6 |
| 4QR | 33.2 [72.51] | 12.6 [27.51] | 54.2 |
| Ch9 | 19.8 [80] | 5 [20] | 75.2 |
| Ch2 | 43.9 [94.3] | 2.6 [5.7] | 53.5 |

Table A16:**Week 2. Balanced vs. Unbalanced Current Affairs Stories**

| Station | Balanced | Unbalanced | Not applicable |
|---------|---------------|----------------|----------------|
| 4BC | 25 [66.7] | 12.5 [33.3] | 62.5 |
| 4QR | 61 [90.1] | 6.7 [9.9] | 32.4 |
| Ch9 | 50 [90.9] | 5 [9.1] | 45 |
| Ch2 | 81.5 [100] | [Nil] [Nil] | 18.5 |

Story Source

In the group of tables which follows, we distinguish between the identifiable sources for news and current affairs stories. News items are divided into local, network, foreign, others (which refers to an overseas news agency) and none, which indicates that it is impossible to attribute a source. Current affairs items have the additional item of host, for those stories dealt with directly by the host as a piece to camera or an interview, and the none category is not applicable.

It has occasionally been necessary to make judgements about story sources which are based on the use of actuality inserts. Generally, it has been assumed that all actuality coming from a local source is the product of the efforts of a local journalist and that all actuality coming from national sources has been produced by a network journalist. However, because of the tendency for some journalists to use international actuality without attribution, any actuality not accompanied by a voice report is classified under the None category to signify the impossibility of legitimately nominating the source.

Table A17:

Week-1. Story Source for News (as a % of total no. stories)

| Station | Local | Network | Foreign Corresp. | None | Others |
|------------|-------|---------|---------------------|------|--------|
| 4BC | 11.8 | 13.8 | 8.4 | 62.6 | 3.4 |
| 4QR | 39.5 | 27.9 | 9 | 21 | 2.6 |
| Ch 9 | 37.5 | 19.5 | 4.7 | 28.1 | 10.2 |
| Ch 2 | 23.6 | 31.7 | 16.3 | 22.8 | 5.6 |

Table A18:

Week 1. Story Source for Current Affairs

| Station | Local | Network | Foreign Corresp. | Host | Others |
|------------|-------|---------|---------------------|------|--------|
| 4BC | 15.8 | 14 | - | 63.1 | 7 |
| 4QR | 10.1 | 54.5 | 21.2 | 12.1 | 2 |
| Ch 9 | 9.1 | 68.2 | - | 22.7 | - |
| Ch 2 | 5 | 42.5 | - | 52.5 | - |

Table A19:

Week 2. Story Source for News (as a % of total no. stories)

| Station | Local | Network | Foreign Corresp. | None | Others |
|------------|-------|---------|---------------------|------|--------|
| 4BC | 18.9 | 7.5 | 9.6 | 58.2 | 5.7 |
| 4QR | 50.8 | 10.5 | 9.7 | 25.2 | 3.8 |
| Ch 9 | 38.8 | 19 | 9.1 | 29.8 | 3.3 |
| Ch 2 | 32.5 | 28.1 | 16.7 | 18.4 | 4.4 |