

Australian Screen Directors Association

Dear Julie,

[1] Please find a dot point of those issues that are being raised by ASDA in relation to the draft report of the Productivity Commission into the Broadcasting Services Act.

[2] Essentially, ASDA is pleased that the Productivity Commission has accepted the industry's arguments about the need for regulation to achieve the Government's cultural policy objectives. However, it is concerned that the Commission does not appreciate that these objectives can only be fulfilled by providing a framework that allows a critical mass of production to be fostered and developed. This critical mass is vital because it provides a turnover for companies and creative personnel who would otherwise find it un-economic to service domestic TV and feature production.

[3] The issues that are of most concern to ASDA include:

[4] **1. Overall Transmission Quote:** ASDA is concerned with the recommendation to completely abandon the 55% quota, as this would threaten the critical mass of production which ensures that the Government's cultural objectives are met;

[5] **2. Advertising:** ASDA believes that the decision to remove any regulation of the commercials industry would be even more disastrous for the production industry, and would be asking that regulations in fact be tightened rather than reduced further.

[6] Notwithstanding arguments about the "culture-ness" or not of commercials in Australian society today, there are certainly broader issues that are affected by this recommendation. The film and TV industry has not fully recovered from the decision to de-regulate commercial in 1992. Many directors of features and TV earn their bread and butter making commercials, and a further deregulation would undoubtedly threaten their capacity to earn a living and forge a career as directors, and therefore have a marked effect on Australia's capacity to make good TV and film productions. (At least 1-0% of ASDA's membership who consider themselves drama and documentary directors regularly work in commercial production).

[7] **3. Definition of Australia program:** ASDA is alarmed by the Productivity Commission's recommendation to discount the creative participation of personnel outside the director/producer/writer/lead actor axis. Notwithstanding the collaborative nature of the Industry. It is also important to recognise the developmental aspects of these positions, and the role that they

often play in providing crucial experience to people who later move to more central creative positions in the filmmaking process.

[8] These represent the three key issues that ASDA wishes to specifically discuss, beyond those that have been raised in the submission by the Australian Federation of Film and TV Associations. ASDA is happy to elaborate on any of the issues that were raised in this submission.

Sincerely

Richard Harris
Executive Director