

**Broadcasting Inquiry**  
Productivity Commission  
Locked Bag 2 Collins Street East PO  
Melbourne VIC 8003

12<sup>th</sup> May 1999

Submission without Prejudice

Dear Chairman

As a narrowcast broadcaster and one of the first of such operators to commence operations in Queensland, we have been on the receiving end of the C.B.A.A (Community Broadcasters Association of Australia) complaints to the A.B.A. (Australian Broadcasting Authority)

The Narrowcasters are well placed with over 1560 licensed operators throughout Australia to promote Australia to locals and overseas visitors alike. Yet we have NO redress to the A.B.A Board because we have NO appointed representatives on the A.B.A Board, this is contrary to the Commercial and Community broadcasters who are well represented at A.B.A Board level.

The C.B.A.A have used the Narrowcasters as a vehicle to push for additional commercial advantages by insinuating that the Narrowcasters are not adhering to the Broadcasting Act of 1992.

If the Narrowcasters had representation on the A.B.A board the majority, if not all of these cases brought to bear on the Narrowcasters would have been cast out at Board level, as the Community Broadcasters agenda would have been revealed.

The C.B.A.A has gained strength in their demands as the Codes & Conditions Department of the A.B.A fail to apply the option of (e) for any other reason, which is a major part of the Narrowcast terms of Broadcasting.

Its our major belief that the Narrowcasters are heavily discriminated against when compared to the Community Broadcasters in that we pay a license fee for 1 x watt and an annual renewal license fee.

Other discriminatory practices are the limiting of 1 watt to urban areas, whereas community stations in urban areas receive upward of 2,000 watts pay NO license fee or annual license fees.

With the low output of 1 watt our signal can not penetrate the infrastructure of today's building materials so we can not be heard in motels, car rental companies, bus stations, airport concourses, shipping terminals, shopping facilities, or tourist information centre's which has been the niche markets of narrowcasters.

We suggest a lift from 1 watt to 50 watts so that their target audience can hear Narrowcasters who are broadcasting on the same frequency. With each player broadcasting on the same output the signal from surrounding stations would cancel each other out at the mid point of the 10 kilometer radius.

Yours Faithfully

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