

Attention: Ms Delwyn Rance
Productivity Commission
broadcasting@pc.gov.au

Please accept the following comments in response to issues that pertain to community broadcasting raised in chapter 5 of the draft report into Broadcasting (1999).

The Commission seeks further comment on the methods of allocating community broadcasting licenses. (p. 97)

The draft report points out that currently community broadcasting licences are issued to broadcasters who are selected on a merit-based approach. Currently the ABA is responsible for allocation. It has been suggested that licence allocation could be placed in the hands of local government, based on the argument that ‘decisions affecting individuals should be made as close as possible to those whose interests are affected’.

It is unclear what the advantages are of putting licence allocation in the hands of local government. As the draft report recognises, licence allocation by local government would have the effect of politicising such a decision. It is unlikely that a council would want to be responsible for making such a choice. Anyone who spends time at a community radio station learns that decision making with respect to access and allocation of station resources is a politically charged environment. Where groups compete for a licence conflict is a fact and it may not be in the interest of a local authority to become the umpire. It is therefore desirable to keep licence allocation in the hands of the Australian Broadcasting Authority which can be said to be politically neutral.

Furthermore, it is questionable whether placing licence allocation in the hands of local government would be a cost-effective measure. It would mean a duplication of public servants who are qualified in broadcasting matters.

Currently, licence allocation seems to be based on spectrum availability, as well as suitability of the potential licensee. There seems to be little regard for population statistics. While metropolitan stations can operate well-enough without the assistance of local government, community broadcasters servicing smaller communities, many with populations of less than 10,000 persons, do not benefit from niche marketing. Hence, the ‘opportunity cost’ of spectrum usage for metropolitan and non-metropolitan stations cannot be assumed to be equal. Furthermore, allocation of community broadcasting licences based on spectrum availability may do little to encourage access for a diversity of voices and points of view. Instead, more licences in the context of ever-diminishing revenue can merely serve to demonstrate the amateur nature of community radio programming.

The relationship between local government and community radio is little understood. Stories related to me during the course of research into community broadcasting suggest informal links are wide-spread and especially important for non-metropolitan community radio stations. Some claiming they would not survive without it. While local council

may not be the appropriate authority to allocate licences, the possibility of *local government as the community broadcasting licensee* has not been raised. Such models exist in Northern Europe and are worthy of investigation.

The commission seeks participants' views on options for evaluating and renewing community broadcasting licences, including defining and measuring benefits of community broadcasting. (p. 98)

According to the draft report 'the ABA relies on self-regulation and a system of complaints handling to monitor the performance of community broadcasters... However, the complaints system provides little information about the performance of community broadcasters, other than the fact that the complaints are rare'. Currently, there is no active process for monitoring whether community broadcasters provide the services promised before receiving the licence. There is a dearth of empirical research into the community broadcasting sector; and Roy Morgan Research indicates 5.3 per cent of the population listen to some community radio during March 1998 to April 1999.

While there exists little published Australian community media research, pre-occupation with audience measures may not be of interest to policy makers. Audience measures are designed in the context of maximising profits, which is not the primary purpose of community broadcasting. Furthermore, such measures are of little benefit to community radio stations in small population centres, or where such stations serve minority interests.

Audience measures are also designed to measure the response to program content. While all community broadcasters desire to produce content that is appealing, as well as informative, assessments of the performance of community broadcasting must go beyond content and audience appeal. If measures of support are sought, then it makes sense to firstly determine the extent of community support expressed in terms of stations' membership, or subscribers. These supporters are qualitatively different from 'audiences' and thus require a measure that is not a rating.

Of greater interest is what community broadcasters *do*, rather than what they produce. According to the *ABA Update* 'Community radio complaints dropped from 150 in 1994 to 119 in 1995. The biggest category of complaints related to participation in the management of stations' (June 1996, no. 44, p.3). Complaints dropped more considerably in subsequent years. Between 1995 and 1999 the ABA reported a total of 39 complaints, of which 19 dealt with participation, management, representing community interests and conflict resolution (ABA Annual Reports 95/96 - 98/99).

Little is known of the value of community broadcasting to its participants. Some 10,000 volunteers are active in community broadcasting. The role of community broadcasting in personal development, self-esteem, social interaction, the acquisition of a range of practical, as well as decision-making skills, and the opportunity to 'give a voice to the voiceless' is widely recognised by its practitioners, but rarely the subject of investigation. While the sector is recognised as a *de facto* training ground for future media

professionals, its value in encouraging citizenship is not recognised. By 'citizenship' I refer to the rights and responsibilities of participating individuals in public decision-making and action. It is precisely this activity of participatory self-management in community broadcasting that has a role to play in the development of citizens. These are issues that cannot be determined with audience measures, nor can they be determined on the basis of the ABA complaints system, which would, in any case, merely represent the tip of the ice berg.

An evaluation of community broadcasting must take into account its active participants, rather than a passive audience. Furthermore, evaluations should be regular. At the moment, the Australian Bureau of Statistics conducts a survey of broadcasting services every few years. But data collection is restricted to staffing (including volunteers) and income and expenditure. A more detailed three-yearly census of the sector, or similar, would be desirable. Census design could reflect the interests of regulators and the sector. It could be administered by the appropriate community broadcasting organisation, or by the ABA, or even by the ABS. In any case measurement of performance indicators requires dedicated and adequate funding. Again, examples exist in other countries and are worthy of investigation.

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