



**PRODUCTIVITY COMMISSION  
INQUIRY INTO BROADCASTING**

**SUBMISSION FROM  
WIN TELEVISION NETWORK PTY LTD**

11 May 1999

The WIN Television Network is a party to the FACTS submission to this inquiry, which is silent on the subject of ownership and control of Australian media.

We would like to make the following comments on the various rules covering this matter.

### ***Geographical Limits***

Being a Regional Operator with the objective of providing a service tailored to the needs and lifestyle of Regional Australians we believe it is vital for the 75% population reach rule to be retained.

If a person/company was permitted to control commercial television broadcasting licences that covered 100% of the Australian population, regional television as we know it would disappear. Technically, it would be much more cost-effective to close down all regional facilities and cover the area with repeater stations from, probably, Sydney.

This would result in significant unemployment in areas where our country can least afford it – regional Australia; the demise of all local programming, including local news and probably the disappearance of an advertising medium for local regional businesses (it would be much easier and cheaper to just broadcast national commercials from Sydney).

Over the past 38 years regional television has contributed immeasurably to the welfare of local communities, charities, sporting bodies and the like, to the point where this support is now ***needed*** each year. The television station is an integral part of the local community and is able to assist the continued development of regional centres.

If this rule was changed the financial pressure that would be placed on regional operators would be unbearable and it would not be too long before they succumbed to that pressure.

### ***Foreign Ownership***

We do not have too strong a feeling on this rule. However, in this world of instant global communication and the technological advances being made, especially with the Internet, there is a very rapid convergence taking place where very soon it may be difficult to accurately separate and recognise commercial television broadcasting from the “new media”.

With this in mind, we believe that the foreign ownership limit should be increased to at least 49%, if not abolished altogether.

### ***Cross Media Ownership***

We believe that restrictions on cross media ownership ***in regional Australia***, at the very least, should be abolished. More and more regional radio and press are being taken over by national, capital-city-based organisations that results in a diminishing of local jobs and local input. As the number of media outlets in all forms continue to increase, it becomes more and more difficult for regional media to remain viably relevant.

If regional cross media groups were allowed to merge then local relevance would be maintained to the benefit of the community.

***Conclusion***

It appears to us that most regulations are drafted to target the major media in capital-city markets with little if any consideration being given to the different characteristics of regional Australia. We think it appropriate, that in many instances, different rules should apply.

WIN Television is the largest regional television broadcaster in Australia, operating services throughout Queensland, Southern New South Wales, Australian Capital Territory, Victoria, Tasmania and Western Australia.

We have our corporate headquarters in Regional Australia – Wollongong, New South Wales.

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