



Australian Community Television Alliance

Suite 1 2-4 Douglas Street, Southbank, VIC 3006 Woi Wurrung Country

Community Broadcasting Sector Sustainability Review

Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts

5th September 2024

The Australian Community Television Alliance acknowledges the First Nations peoples of Australia, whose connection to country and living cultures began in time immemorial and helped shape our understanding of this land. We recognise sovereignty has never been ceded and affirm our commitment to advancing reconciliation.

THE AUSTRALIAN COMMUNITY TELEVISION ALLIANCE

The Australian Community Television Alliance (ACTA) is a not-for-profit industry association dedicated to representing and advancing the interests of free-to-air community television (CTV) channels across Australia. Established to serve both current and prospective CTV licensees, ACTA operates under the Cth. Broadcasting Services Act, 1992. ACTA has played a crucial role in supporting and promoting CTV's unique contributions to Australian media and culture.

Under the proposed CTV Transformation Plan referenced below, ACTA's structure, governance and function is scheduled for review, with a view for a modernised sector body to emerge.

C31 MELBOURNE & C44 ADELAIDE

C31 Melbourne and Geelong (C31) is Victoria's CTV service providing locally based entertainment, education and information. Channel 44 (C44) is South Australia's community broadcaster, bringing local TV on free-to-air across Greater Adelaide.

Both stations are non-profit, purpose-driven organisations working with partners in the education, culture and screen sectors to facilitate the production of diverse local content for broadcast and streaming, assist similarly for-purpose organisations to engage communities through screen content and to provide the skills and pathways that enable emerging and aspiring local creators to produce content and gain industry experience. C31 & C44 provide access and representation to the many diverse communities within their local licence areas and beyond. Both stations feature faces, voices and issues which are often overlooked by mainstream television.

Our programs are almost exclusively original and locally produced content – an approximated 90% of C31 & C44's free-to-air television broadcasts are Australian-made. These programs are produced by an estimated **1,000 volunteers** each week, featuring around **40 multicultural and linguistically diverse producers**, with an overall focus on the needs of underrepresented and underserved communities. **It is estimated that around 1 in 12 Melburnians and 1 in 8 Adelaideans watch CTV¹.** It is an essential training ground for the Australian media: these stations have also launched countless media industry careers.

CTV PLUS

CTV+ is the digital home of CTV across Australia, with over 150 locally produced programs and 3,000 individual episodes available on-demand, along with the provision of C31 and C44's free-to-air linear broadcasts. In contrast to other BVOD services, CTV+ content is **100% Australian made**.

CTV+ is currently available via ctvplus.org.au, available to download on mobile devices via iOS and Android and is currently in development for Smart TV releases on the Android and Samsung TV platforms in early 2025. ACTA is currently actively seeking prominence protection for CTV+.

¹ Oztam Ratings, Ave AUD (Total People), Potential Audience 5,433,525 (Melbourne), 1,527,772 (Adelaide), Sample Size 3,688 (Melbourne), 1,557 (Adelaide) – December 2023.

A NEW DAWN FOR AUSTRALIA'S COMMUNITY TELEVISION SECTOR

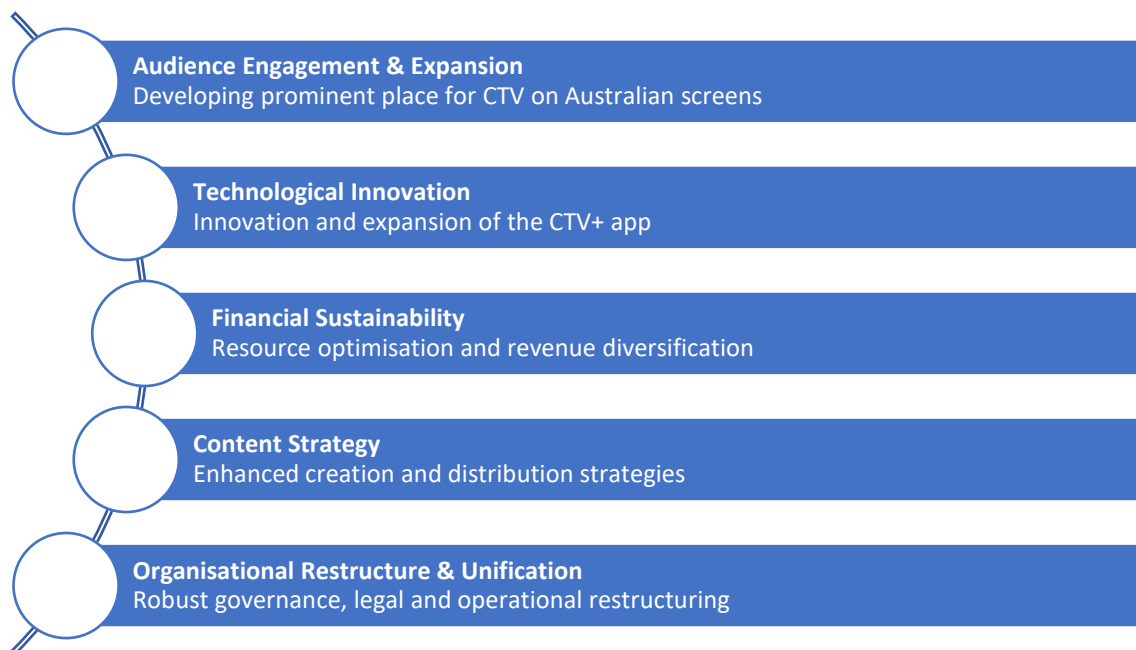
Australia's CTV sector stands at a transformative crossroads. With the recent landmark legislation passed by the Albanese government, CTV stations have been given the opportunity to continue to play an essential complimentary role in Australia's diverse media landscape, opening the door to an exciting era of unity and innovation.

Aligned with the Community Broadcasting Roadmap 2033, the CTV Transformation Plan envisions a future where C31, C44, and other local content creators across the nation converge into a powerful, sustainable and unified entity.²

As we unite, we're not abandoning our local roots — we're giving them room to adjust to the changing media environment, restructure and flourish on a national scale. We envision a future where CTV is more relevant, influential, and essential to Australian society than ever before.

This proposed consolidation isn't just about operational efficiency — it's about creating a robust media organisation that amplifies diverse voices, nurtures talent, and contributes to multicultural Australia's identity and social cohesion.

The plan focuses on five critical pillars:



ACTA member stations, C31 & C44, are in active discussions with the Department of Communications and Minister for Communications Michelle Rowland about how the Albanese Government can proactively support this vision, as a part of their overall support for the broader community broadcasting sector. The CTV Transformation Plan will be supplied for consideration to all key stakeholders in the coming days.

² Community Broadcasting, Roadmap 2033, Published October 2023. <https://cbf.org.au/wp-content/uploads/2023/10/FINAL-Roadmap-2033-digital-viewing.pdf>

BEYOND BROADCASTING: CTV'S CRUCIAL IMPACT

In today's rapidly evolving media landscape, CTV remains a significant and impactful medium. Here's how we're reaching audiences across Australia and making a meaningful difference:

1. **Amplifying Diverse Voices:** Just as community radio gives voice to the unheard, CTV shines a light on the unseen.
2. **Cultural Kaleidoscope:** A reflection of the rich diversity of Australian life demonstrated through our programming, showcasing the many facets of our society.
3. **Media Rebellion:** We're challenging conventional media norms by promoting a more inclusive and diverse range of perspectives.
4. **Talent Launchpad:** We provide opportunities for emerging talent to develop and showcase their skills, helping to shape the future of Australian media.
5. **Community Superglue:** Strengthening community ties, bridging differences, and contributing to a more socially cohesive Australia by fostering inclusion, participation, and a sense of belonging.
6. **Public Service:** We help deliver essential information, emergency updates, and community-focused content to audiences that may not be reached by mainstream media.
7. **Economic Energiser:** Supporting local economies by creating jobs, supporting small-to-medium local businesses and encouraging entrepreneurship within our communities.
8. **Innovation Incubator:** We're at the forefront of media innovation, continually exploring new ideas and setting trends.
9. **Wellness Wonderland:** We combat isolation and uplift spirits by creating a supportive, inclusive environment that embraces the diversity of all Australians.

CTV in Australia is a vibrant showcase of local talent and stories, setting a gold standard with an above-industry-standard percentage of domestically produced content on free-to-air television and 100% Australian-made programming on our CTV+ streaming service.³

CTV is more than just television — it's a platform for connectivity, creativity, and community empowerment. We're not just offering new programming; we're making a positive impact, one broadcast at a time.

³ Australian Communications and Media Authority (ACMA), 2022 commercial television Australian content results released – published 31 July 2023. <https://www.acma.gov.au/articles/2023-07/2022-commercial-television-australian-content-results-released>

THE CORNERSTONE OF OUR FUTURE: CTV+ & PROMINENCE

At the heart of our long-term strategy for a vibrant and viable CTV sector lies the development of a Smart TV app, supported by prominence legislation protection and overall expansion of the CTV+ platform.⁴ This is a crucial step forward in ensuring that CTV remains accessible and relevant in the coming decade, offering Australians an easier and more dynamic way to connect with local content.

CTV+ requires investment to ensure key strategic outcomes are achieved:

1. **Prominence and Accessibility:** We are actively working to secure prominence on Smart TV's. This is pivotal to ensure CTV+ is easily discoverable, placing community content alongside major broadcasters and streaming services, thus increasing our competitiveness and sustainability. *This is a critical point for CTV's long-term success.*
2. **Nationwide Reach with Local Focus:** The CTV+ app transcends geographical boundaries, enabling us to share local content with audiences nationwide. This broader reach strengthens our ability to engage more viewers while preserving the local essence that makes our content unique, enhancing our relevance and sustainability across Australia without losing sight of the respective communities we are committed to representing.
3. **Unified Content Distribution:** With a national platform, we can streamline our content distribution, reducing costs and increasing efficiency. This allows for better resource allocation and improves financial management.
4. **Data-Driven Decision Making:** Further app development will provide valuable viewer data, allowing us to tailor content and improve our programming strategies. This data-centric approach will help optimise our operations and increase our appeal to advertisers and sponsors.
5. **Diversified Revenue Streams:** A nationally available app prominent on a variety of screens, opens new avenues for centralised advertising, sponsorship, and potential pay-per-view services, contributing significantly to the sector's financial sustainability.
6. **Cost-Effective Technology Adoption:** The CTV+ platform positions us to quickly adopt emerging technology and viewing trends, future-proofing content delivery while maintaining cost-effectiveness.
7. **Operational Efficiency:** By centralising our digital presence, we can reduce the overhead associated with maintaining multiple regional platforms, leading to significant cost savings.
8. **Enhanced Value Proposition:** Serving as a platform for educational content and community engagement initiatives, strengthening our value proposition to viewers and potential funders.

The national development for CTV+ is a cornerstone of our digital-first strategy and a key driver of our financial sustainability. Our goal is to not just secure the future of CTV; but to modernise it, ensuring that local voices and stories remain at the forefront of Australia's media landscape while building a sustainable business model. Investment in CTV+ is an investment in a self-sustaining future for community television for years to come.

⁴ CTV+, Officially launched August 2021. <https://ctvplus.org.au/>

A COLLABORATIVE SECTOR: AHEAD OF THE CURVE

What are the advantages and/or disadvantages of the consortium model, co-location, sharing infrastructure and network content?

C31 Melbourne and C44 Adelaide have been trailblazers in the community broadcasting sector, exemplifying the power of collaboration and co-design. Through their joint efforts, they created the shared digital platform CTV+, which serves as a unified space for Australian-made CTV content, significantly expanding reach, impact and future audience opportunities.

Further demonstrating a commitment to innovation and efficiency, both stations are currently undertaking a major overhaul of their playout and programming systems, a project funded by the Community Broadcasting Foundation (CBF). This initiative focused on building shared infrastructure and resources, aligning with the Sector Roadmap 2033's emphasis on collaboration to enhance operational delivery and technical services.

By leveraging economies of scale and working together, C31 and C44 are not only maximising the positive outcomes of their efforts but are also setting a standard for resilience and capacity-building within the sector. Their collaborative approach highlights the benefits of shared resources, ensuring sustainable growth and the continued delivery of high-quality, locally relevant content to diverse audiences across Australia.

The CTV Transformation Plan builds on the existing spirit of collaboration and co-design, establishing a strong framework for the sector's future. This framework aligns with broader sector goals for the next decade and offers the government an opportunity to make informed investments in CTV, guided by a robust and vibrant vision.

KEY TRAINING PATHWAYS AND TERTIARY PARTNERSHIPS

C31 and C44 play a vital role in this ecosystem by providing on-the-job mentoring and opportunities for early-career below-the-line crew to work on real TV productions. Both stations offer a practical learning environment where emerging creatives and crew can gain the necessary skills and experience to supplement tertiary training and create pathways into industry. By facilitating hands-on learning and opportunities to build network and gain screen credits, community TV helps to bridge the gap between education and industry needs, contributing to a more prepared and adaptable workforce.

The research behind the South Australian Film Corporation's Workforce Development Strategy clearly shows not only the challenges in crewing local TV productions in Australia but also the place for community TV in bridging those skills gaps.⁵ It underscores the need for further collaboration between formal education and industry, as well as the high costs associated with on-the-job training. The study found that lower-budget production workers need to be adaptable and multi-skilled, and that a steady pipeline of skilled and experienced talent is crucial for a sustainable industry. The

⁵ South Australian Film Corporation, SA Screen Industry Workforce Development Strategy, Published April 2023, <https://www.safilm.com.au/download/10721/?tmstv=1682490909>

sector relies heavily on casual, temporary, and freelance workers who secure jobs through personal recommendations and prior experience.

Professional productions across the country need a workforce with practical skills and screen credits, which can only be obtained through hands-on experience. It also points out that many tertiary programs are overly theoretical, with a disproportionate focus on above-the-line roles like writers and directors, leaving graduates ill-prepared for the realities of below-the-line roles and freelance work. Furthermore, the study found that tertiary programs and post-tertiary initiatives are predominantly focused on scripted TV and film productions and not enough on other forms of audio-visual production, particularly the unscripted TV and video production that C31 and C44 specialise in, which can serve as equally effective training grounds for new talent.

With Government support, the sector can invest in new partnerships and mentorship programs with tertiary institutions and training organisations beyond Adelaide and Melbourne. This will create more national opportunities for emerging screen practitioners to gain real industry experience, helping to build a more sustainable workforce for the future.

SIMPLIFIED REGULATORY FRAMEWORK

What are the impacts of current licensing conditions on your organisation's sustainability?

C31 operates under a community broadcasting license, which fully acknowledges its role as a CTV station, providing it with the regulatory support and protections necessary for its continued operation. In contrast, C44, despite functioning similarly and being an essential part of the local media landscape, holds a narrowcasting license due to a historical anomaly. This licensing discrepancy has led to unequal treatment under current regulations, particularly in the context of new legislation like the Prominence and Anti-Siphoning Bill. As a result, C44 does not receive the same protections and recognition as C31, despite their similar community-focused missions.

Aligning C44 with the same broadcasting license conditions as C31 would streamline regulatory oversight and eliminate the current discrepancies in how these stations are treated under Australian law. Moving towards a unified licensing model would not only reflect the true nature of C44's operations but also ensure that both stations receive equal recognition and protection. This alignment would enhance the stability and sustainability of the CTV sector and fits within the CTV Transformation Plan, allowing both metro stations to better serve their audiences and strengthen their collaborative efforts.

CTV AND SPONSORSHIP

What are the advantages and/or disadvantages of the current sponsorship limit and/or process?

The current sponsorship limit of 7 minutes per hour for CTV and 5 minutes per hour for community radio ensures that these platforms maintain their community-focused ethos, limiting commercial influence and keeping the content accessible and relevant to their audiences. However, this hard cap also presents significant challenges, particularly for CTV, where prime-time slots are the most valuable for attracting sponsorships.

One of the main disadvantages of the current system is its lack of flexibility. The rigid cap does not account for the varying value of different time slots. Prime-time hours, typically between 6:30-10pm on weeknights, attract the largest audiences, making them the most lucrative for sponsors. Under the current system, CTV is unable to fully capitalise on this demand, potentially leaving significant revenue on the table. This restriction can limit the financial sustainability of CTV stations, which rely heavily on sponsorships to fund their operations.

Moving to an averaging model, as advocated by the Community Broadcasting Association of Australia (CBAA), would address some of these limitations by allowing stations to adjust their sponsorship content to better match audience demand. This would enable CTV to increase sponsorship minutes during peak hours when viewership is highest, thereby maximising revenue opportunities. In turn, stations could offset this by reducing sponsorship during less valuable time slots, such as early morning or daytime programming, where viewership is lower, and sponsorship demand is minimal.

However, implementing an averaging model would require CTV stations to carefully monitor their sponsorship content over a 24-hour period to ensure compliance with the cap. Governing policies would need to be refreshed to dictate that the viewer experience is carefully balanced with the need for higher saturation of sponsorship breaks during peak hours. While this approach offers greater flexibility, it is essential that stations maintain their community focus and interest, ensuring that the increased concentration of sponsorships does not detract from the overall viewer experience or compromise the station's commitment to serving its audience.

Overall, while the current system prioritises simplicity and viewer experience, adopting an averaging model could provide much-needed flexibility for Community TV, allowing stations to better align their sponsorships with audience patterns and maximise revenue, albeit with some minor increased operational demands.

SUMMARY

A key strategic objective of Roadmap 2033 is that:

“Community television is supported to be accessible to Australians in more markets and platforms.”

The CTV Transformation Plan aims to work towards this objective and will position CTV in Australia, as a sustainable media entity, and an exciting launchpad for media talent.

Our focus on sustainability, structure, and development will not only address the challenges we've faced due to past policy uncertainties but will also create a solid foundation for future growth. By optimising our resources and diversifying our revenue streams, we aim to demonstrate that with this initial investment, we can once-again become a profitable and self-sustaining sector.

CTV's strength lies in its diversity, local focus, and commitment to authentic Australian voices. Our transformation plan is not about losing these core values but amplifying them on a national scale. With greater support for the broader community media sector, CTV can be supported to not only survive but thrive.

Furthermore, any potential expansion of the CTV sector, whether through terrestrial free-to-air broadcast or digital platforms, is best served by this plan, which eliminates some of the need for costly infrastructure and duplicated resources. By focusing on streamlined, cost-effective delivery methods, the CTV Transformation Plan works to ensure that CTV can reach more audiences across Australia without the financial burden of independent operators navigating broadcast or streaming realities. This approach not only preserves the sector's sustainability but also opens new avenues for growth and innovation, making it easier for CTV to adapt to emerging media landscapes while maintaining its commitment to local content and community engagement.

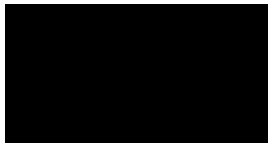
Any investment in Australian CTV is an investment in the future of Australian media diversity, support for local storytelling, and ensuring that every community has a voice in our national conversation.

In addition, ACTA is a proud supporter of and contributor to the Community Broadcasting Roadmap 2033, which envisions community broadcasting as the core of every Australian community. This strategic framework, shaped through extensive sector consultations, highlights the essential role of community broadcasting in reflecting Australia's rich diversity and enhancing local engagement. We wholeheartedly endorse this vision, and we join the CBF in advocating for the following key recommendations:

1. **Consolidate Funding Lines:** Streamline funding allocations to support the goals outlined in Roadmap 2033, considering the consolidation of some funding streams to a higher level for greater impact.
2. **Invest in the Sector:** Provide robust support for the sector's funding submissions to alleviate pressure on grant programs, enabling long-term grants and fostering sector growth, capability, and innovation.
3. **Guidance from Roadmap 2033:** Ensure that funding priorities and grant streams are aligned with the sector's priorities as detailed in Roadmap 2033.
4. **Increase Flexibility:** Enhance and extend flexibility within the granting process to allow the CBF to adapt to the evolving needs and contexts of the sector.

5. **Develop a CBP Outcomes and Performance Measurement Framework:** Collaboratively design and own key collective outcomes, impacts, and measures with sector stakeholders, and integrate these into the Roadmap Evaluation Framework and the CBF's Outcomes and Evaluation Frameworks.

We urge the Government to act on these recommendations to bolster community broadcasting's role as a vibrant and indispensable part of Australia's cultural landscape. By increasing funding, enhancing flexibility, and aligning with Roadmap 2033, we can ensure that community broadcasting remains a dynamic force for unity, creativity, and informed public discourse.



Shane Dunlop
ACTA President



Lauren Hillman
ACTA Vice President

