

Community broadcasting sector sustainability review

Response from Kalamunda Community Radio – 6KCR

Introduction

The ACMA lists 436 active Community Radio Stations in Australia broadcasting on FM with a small number broadcasting on AM. Exact figures for the number of such stations that are part of the National Indigenous Radio Service (NIRS) are not easily obtainable but the Community Broadcasting Association of Australia (CBAA) in their “Roadmap for 2033” state that 16% of Community Radio Stations are in Remote Areas. This implies that about 350 stations are not part of NIRS. We have not been able to obtain a breakdown of stations size but it is clear that Kalamunda Community Radio (KCR), [maximum ERP 200 watts] is certainly amongst the very small stations but has still managed to survive for over 20 years.

In metropolitan areas, small stations with restricted LAPs and broadcast power are unable to compete for sponsorship against large community stations with area-wide LAPs and high-power transmissions. In Western Australia if small NIRS stations are excluded, 16 of the 23 community stations have a maximum ERP greater than 200 watts making KCR amongst the smallest.

Many of the financial problems facing the small stations relate to the disproportionate effect that fixed costs have such as, licences (broadcast, copyright, etc. even though these are partly dependent on station size), insurance, equipment replacement, etc. They also have to rely entirely on volunteers and do not have sufficient income to employ staff.

Priority area 1: CBP funding, structure and outcomes

Questions

- What should the funding priorities and granting streams be for the CBP from 2025 onwards?

Most Community Stations have been in existence for at least 10 to 15 years many for much longer. The CBP should concentrate on improving the now aging infrastructure for smaller, older stations rather than providing grants for programming.

Small stations, say with an annual income less than \$100,000 a year, should be able to access an annual support grant of up to \$25,000 each year. The only restriction on spending being an annual return to show it has been spent on the running of the station. Assuming about one third of stations might fall in this category (probably an overestimate) this would cost less than \$4 million per year.

- What are the advantages and/or disadvantages of:
 - the 3 grants streams under the CBP?

As outlined above it is Development and Operations that should have the highest priority. Sector-wide development projects such as the move to digital broadcasting and internet/5G broadcasting should then be funded provided a well-defined, nation-wide approach is developed. Community stations should fund content development from local sources, e.g. local councils’ arts grants. Central government should not be involved in such local issues.

- single-organisation and single-year grants versus multi-organisation and multi-year grants?

These are not the only mechanisms. Why exclude single-organisation multi-year grants? In the current labour and supply shortage, along with the complications of compliance with local and national regulations, it is very difficult to complete even fairly small projects within a single year, let alone large ones. This is well illustrated by the cost and time overruns of many State and Federal projects. Community radio is no different.

There may well be scope for multi-organisation projects, both single and multi-year. For instance, funding transmission sites that service several community stations in a given area.

- the consortium model, co-location, sharing infrastructure and network content?

Much of this grows out of the answer above. Co-location and sharing infrastructure, particular of transmission equipment and facilities in metropolitan areas would certainly be beneficial. Similarly, negotiating special rates with Internet Service Providers for a consortium of community stations.

Sharing training activities would also assist many stations. Collaborating in the experience of using standardised broadcast software. Shared access to technical advice and assistance.

However, network content sharing would need to involve a financial compensation element and clear definitions of copyright and intellectual property issues.

- sector-coordinated initiatives to assist with governance, strategic and business planning?

Community stations are independent organisations, usually Incorporated Associations. Aside from complying with the requirements of their Incorporation and their Broadcasting Licence, they operate in many different ways. There doesn't seem to be any benefit in outside interference with this.

- Which quantitative and/or qualitative outcomes should the framework consider?
- How can services be supported to collect and report on data?

These two questions can be taken together.

What stations need to know is how many listeners do they have in their LAP? How frequently do they listen? For how long do they listen? At what times? And where/how do they listen – at home; at work; in their car; online? This is especially important in order to provide this information to their sponsor and supporters. This is all data that small community stations such as ourselves do not have except in virtually meaningless general terms, nor can they afford to obtain it themselves.

Accurate local listener surveys funded by central government would considerably help community stations to obtain the sponsorship and similar funding they need.

Priority area 2: Legislative and regulatory issues

Questions

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

The current 5-year re-licensing process is an onerous process, especially for a small volunteer-run station, which provides only negative feedback to community stations whilst taking up to nine months to do so.

There are no guidelines against which stations can judge themselves. Is a station with 500 members with live presenters on-air from only 5 pm to 10 pm with recorded music at other times better than a station with about 75 members but with live presenters on-air from 7 am to 10 pm? How is the involvement of the local community measured? The number of CSAs is a very small part of this. How the station is viewed and supported by the local Councils and other bodies within its LAP is not considered.

Perhaps 5 years after a station receives its first licence an in-depth analysis is justified. Then, say, a brief review at 10 years and a more detailed, although not so onerous, review at 15 years, and so on. Of course, if complaints are being made about a station, then a review might be needed in just 12 months.

The review process shouldn't be a "black hole" with no response for 9 months. A lot can change in that time. If a station is doing poorly, it is not helpful to wait nearly a year to tell them. If this time delay is due to staff shortages, then less in-depth reviews might solve this.

- What are the advantages and/or disadvantages of:

- introducing community participation tiers for remote, rural, regional and metropolitan services?

Without a more detailed analysis of what is proposed and definition of areas it is not really possible to answer. However, surely community participation in remote and rural areas where there are limited other competing organisations, should be the highest, not as it appears the lowest.

- including social media reach and listener data as part of community participation?

Absolutely! The number of paid membership subscriptions a radio station has is an outdated parameter and should no longer be used. People take out paid memberships to organisations such as tennis clubs, community learning organisations, etc. because without doing so they can't participate in the activities offered. Anybody with appropriate means of reception can listen to a radio station from anywhere in the world. Why pay to become a member? Followers on social media should be the current measure of success or otherwise of a station.

- introducing fixed-term programs to train and retain paid staff in the sector?

Accepting that volunteer-only run stations may not be sustainable in the long run, this could be useful. However, who is going to pay these staff during training and what will they do when the term ends?

- the current sponsorship limit and/or process?

When community stations were first introduced the intention was that they were an alternative to “commercial” stations. Presumably lobbying from existing commercial stations who had paid handsomely for their licences influenced the final legislation.

This distinction has become very blurred some 30 years later. Large community stations are “commercial” in everything but name even down to charging to broadcast CSAs. A sponsorship message is an advertisement in all but name with the tag “station sponsor” which means nothing to the listener and confuses potential “sponsor”, i.e., advertisers, so why have it?

The five-minute per hour limit for community stations is less of a problem, especially since community stations, unlike their commercial counterparts have to also fit in CSAs, reducing the time for actual programming. Spreading the time limit over the full 24 hours with less at night and more during the day could help.

A station can obtain sponsorship to cover the cost of running their website and/or their streaming service. If, for instance, every time someone clicks on the streaming link a sponsor message is played first before the stream begins, is this covered by the rules governing broadcast sponsorship? Can a station have paid advertisements on their website or Facebook page? Can a station have a billboard paid for by a sponsor and promoting that sponsor’s products? This doesn’t seem to be covered in the current legislation.

Additional responses

The sustainability review does not seem to address some issues to which we would like to provide input.

Progress Delayed by the ACMA

In April 2021 the ACMA published a consultation paper – “FM broadcasting services band in the Perth RA1 licence area”. This Options paper set out five proposals to improve radio reception in the Perth Metropolitan Area and enable the ABC to move its AM services to FM. The selected option has considerable impact on 6KCR who are expected to give up their 102.5 FM frequency which they have used for about 25 years and the intellectual property invested in that, and move to 88.9 FM. No other Community station in the Perth Metropolitan Area is being asked to change frequency.

A submission was put to the ACMA by the ABC on behalf of 6KCR which, after over 3 ½ years of silence and no consultation by the ACMA with 6KCR suddenly had to be submitted with only 3 weeks’ notice by 31 December 2023. The submission included a request that 6KCR be allowed to increase our tower height to 40 metres and ERP to 500 watts. 6KCR was expected to change frequency by June 2024. The ACMA’s current response is to issue another consultation paper.

6KCR need to replace its now condemned transmission tower but can do nothing until the ACMA responds. It appears to us that there is a serious lack of technical staff at the ACMA since COVID and that the ACMA has no interest in ensuring that Community Broadcasting continues smoothly and efficiently, at least in the Perth Metropolitan area.

Internet only radio stations

Although we are not familiar with all the legislation, it does not appear that the ACMA (or any other Federal body) is regulating these. Anybody with an internet connection, a computer, and a subscription to a streaming service can set up an internet radio station. Do they obtain APRA or PPCA licences especially since PPCA have now introduced an additional licence for those community stations who offer a streaming service? It appears they are not subject to the rules governing broadcast stations in Australia, both community and commercial. Is this going to be addressed and if so, how?

Where does AMCA see the future of terrestrial broadcast?

Presumably there will first be a move away from FM/AM to DAB. What plans are there to assist small community stations to make this move?

Technology is advancing rapidly and already many listeners/viewers use internet or satellite connections rather than terrestrial connections, especially with the advent of fast, unlimited internet services. Even radios in motor vehicles may soon receive over 5G or Starlink-type internet connections which will no doubt become much cheaper based on the experience with other forms of telecommunication technology in past years. It is now possible to access free internet in many aircraft crossing Australia. Similar access in cars in remote areas could soon be available. What provision is being made to accommodate this change which could happen even before 2033?

Is community radio stagnating and outdated?

The various reports do not address this. In the last 10 to 15 years how many new stations have been licensed and how many have closed? If the number of stations is static or falling why is this? Should more be done to encourage new stations to open? The total population of Australia has increased considerably since community radio was introduced. If there has been no growth in the number of stations, why is this?

State/Federal Government Information Promotion

Government bodies promote healthcare and similar messages widely on commercial and large community stations, presumably paying for this. Examples would be flu/COVID/RSV vaccinations. Shouldn't such promotional material be sent to all community stations as was the case during the COVID-19 pandemic, perhaps with a small payment provided to the station? State and Federal Government have a significant resource in the Community Radio network which they are neglecting.

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