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Content Division

Department of Infrastructure, Transport, Regional Development and Communications

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Re: Comments on the Media Reform Green Paper

Thank you for the opportunity to provide the association's comments on the Media Reform Green Paper, published by the department for comment on the 21st of December 2020. Our members comprise the wholesalers, manufacturers and retailers of musical instruments and music and audio technology.

Our members' products are utilised daily by end users across a broad range of sectors including schools, churches, conference and exhibition facilities, Hospitality, Venues, Theatres, TV production, corporate meeting rooms and Education. Our industry also supplies wireless devices to the entertainment sector through live performance and production professionals, musicians etc.

We note that wireless audio devices, (Eg: wireless microphones (handheld, lapel and headset mics), wireless guitar and instrument systems, and wireless in-ear listening/hearing systems, are not specifically mentioned in the green paper. We urge the department to consider these systems and ensure allowances are made to support their operation within any new framework that is proposed. The viability of these systems is reliant on continued availability of sufficient interference-free spectrum in the UHF TV broadcast band.

Products that service the production of live music are a part of a billion-dollar industry.

Studies into the venue based live music industry (predominantly clubs and pubs) have found this sector injects **\$1.2 billion** annually into the Australian economy. It also supports close to **15,000 jobs**.

Live music performances and music festivals are the biggest contributor to Australia's live performance sector, which has been valued at **\$2.55 billion** and responsible for **employing nearly 35,000 people** in a new report by industry body Live Performance Australia (LPA).

Our members would agree that a minimum period of **5-7 years** should be allowed before a new framework comes into effect. This would allow time for manufacturers to develop new products and for secondary users to transition equipment to a different part of the spectrum as the newer, more suitable products become available. A shorter period will adversely affect multiple users making relatively recent equipment acquisitions redundant and reasonably the shorter the time period, the greater the expectation of financial support.

A major challenge to our members is that the consumer end of the market will be decimated. Specifically:

1. From the retailer point of view, it will be harder to sell higher end gear and a key market in the lower end wireless gear will be severely affected

2. Retailers will be flooded with product returns, as consumers complain their recently purchased product is no longer legally usable.
3. It will be more expensive to be a live musician. In a time when the industry has been profoundly impacted by the pandemic, additional imposts will be another drag on an already beleaguered industry.
4. Is the consumer going to be shut out of the market? Countless schools, conference organisers, event venues and so on could be faced with unaffordable upgrade costs.

Secondary users in the broadcast spectrum will be disrupted and possibly have to purchase new equipment in order to continue deriving an income.

We would propose that the government works with the relevant peak industry bodies (the Australian Music Association (AMA) and the Australian Commercial and Entertainment Technologies Association (ACETA) develop a compensation package or tax incentive to purchase new equipment.

Revenue from the sale of the spectrum should be used to support the public policy initiatives and compensate secondary users who may need to vacate the spectrum due to the proposed restack.

Experience gained during the digital dividend of 2014/2015 taught that much of the user base for wireless audio devices are extremely difficult to contact. This is due to the fact that there is no formal licence process or central registry for users of class licenced products. Plus, many of these end-users are non-technical and don't follow government or industry news. We still occasionally find 700 MHz wireless audio devices in operation that should have been retired in 2015. In most cases the operators of these devices were completely unaware of the previous digital dividend or the changes to the permitted operating range.

We encourage the department to allocate resources and budget to fund a wide-ranging communications program to target and inform such users of any further changes. We further encourage the department to engage with industry peak body groups such as the Australian Music Association (AMA) and the Australian Commercial & Entertainment Technologies Association (ACETA) to assist with this program.

Yours sincerely



Robert Walker
Executive officer
May 21, 2021

About the Australian Music Association

The Australian Music Association represents the interests of traders, wholesalers, retailers and manufacturers of music instruments, audio and music technology. Incorporated in 1977 the association represents over 600 businesses in Australia. www.australianmusic.asn.au