



ADELAIDE
COMMUNITY
TELEVISION

Response to the Australian Government's Media Reform Green Paper
– 'Modernising television regulation in Australia'

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EXECUTIVE SUMMARY

C44 Adelaide, with the Australian Community Television Alliance (ACTA), submits that

- Community TV (CTV) should be included in the Federal Government's proposed media reforms to ensure Australian broadcasting meets the objectives of Broadcasting Services Act 1992 to
 - Promote the development of an Australian identity and reflect cultural diversity
 - Promote the availability of television programs about matters of local significance, and
 - Ensure diversity in broadcasting services in the transition to digital broadcasting
- Community broadcasting licensees should retain free-to-air broadcasting at least until the spectrum they occupy is reallocated—a process currently not expected to occur until mid-2024, as per the Green Paper
- Community broadcasting licensees should at the absolute least retain free-to-air broadcasting until consultation on the Green Paper is completed.

Further, ACTA submits that community TV should be included in the proposed media reforms for the same reasons the Green Paper (on page 3.) argues they are necessary to protect commercial broadcasters:

- because 'older Australians, the less affluent ... are less likely to use alternatives to free-to-air television ...'
- to keep 'Australian stories available on our television screens', and
- because, without community TV, 'the volume, variety and quality of Australian content available is likely to decline; audiences will have access to few Australian voices and stories.'

COMMUNITY TELEVISION HISTORY IN AUSTRALIA

In 1992, Community Television was added to the Broadcast Services Act as a key pillar of the Australian broadcasting landscape. Community Television stations are legislated to exist and are defined as a service that;

- Is provided for community purposes.
- Is not operated for profit or as part of a profit-making enterprise.
- Is able to be received by commonly available equipment.
- Is made available free to the general public.

In 1994, Community Television stations were provided with trial broadcast licences across Australia. In 2004, Melbourne station C31 Melbourne was provided with a full-time community broadcasting licence by the Australian Broadcasting Authority, now the ACA.

Throughout this time, Community Television flourished, producing several mainstream TV personalities and providing a training pathway for innumerable amounts of Australian screen professionals. Not to mention each stations role in providing access to a free-to-air TV platform for diverse, often marginalised and important community groups.

Community Television stations lobbied for inclusion into the digital TV framework and through 2010 were successfully transitioned from analog to digital broadcasting.

In 2014 it was announced that our Transmitter License would not be renewed beyond December 2015. At this time, Community Tv stations generated 95% of their income from activities related to broadcasting with average incomes of around \$1.5-2.4million p.a.

Community TV stations then began lobbying Communications Minister Malcolm Turnbull, then Senator Mitch Fifield and now Minister Paul Fletcher for ongoing access to spectrum and has achieved 7 extensions – remaining stations in Melbourne and Adelaide are currently licensed to June 30 2021.

A brief summary of the history of extensions below:

- 11 Sep 2014 – Minister Turnbull announces intention to move CTV stations online – Deadline set for 31/12/15.
- Sep 2015 – Received a 1-year extension after successful Commit to Community TV Campaign.
- 20 Dec 2015 – TVS Sydney Switches Off – a decision made by University of Western Sydney’s board who owned the licence.
- 12 Dec 2016 – Stations received a 6-month extension (2.5 weeks prior to switch-off)
- 28 Feb 2017 – Bris31 voluntarily switches off, operates as an online service for the following 6 months and promptly goes into receivership.
- 27 Jun 2017 – Stations receive a 6-month extension (4 days prior to switch-off)
- 14 Sep 2017 – Stations receive another 6-month extension (3.5 months prior to switch-off)
- 1 June 2018 – After C31 Melbourne, C44 Adelaide and WTV Perth met with Senator Fifield, the three stations receive a 2-year extension and experience their best period of growth and stability in five years.
- 4 June 2019 – ACTA/CTV Options Paper delivered to new Communications Minister Paul Fletcher. It outlines “more time to go-online” but also advocates for permanent access to spectrum.
- 6th Feb 2020 – The Department of Communications flags Minister Fletcher’s intention to switch off Community TV stations by June 30 2020, despite there being no announced plan for the spectrum beyond that date.
- 18 Feb 2020 – Due to ongoing spectrum access being in doubt, WTV Perth switch-off and file for insolvency.
- March-June 2020 – COVID hits and remaining stations in Melbourne and Adelaide attempt to lobby Minister Fletcher to reconsider his June 30 deadline. Stations are advised that the Minister’s decision is final.
- 29 June 2020 – Live on the ABC’s Q&A the Minister announces a 12-month extension for both stations, less than 26 hours prior to planned switch-off.

- 27 Nov 2020 – The Media Reform Green Paper is announced. It confirms that the spectrum currently used by Community TV stations will go unused until at least 2024, possibly as late as 2026.

- 18 Dec 2020 – C44 Adelaide and C31 Melbourne are invited to provide their responses to the Media Reform Green Paper.

- 20 Apr 2021 – Station management meet with the Department of Communications and are advised that, despite being invited to participate in the Green Paper consultation process, they will still be switched off by June 30 2021.

SUMMARY OF RESPONSE

On 16 March 2021, on behalf of both remaining Community TV stations, management of C44 Adelaide wrote to Minister Fletcher to request urgent consideration of our joint request for inclusion in the government's proposed re-stack of TV spectrum and a commitment that both stations' licences will be maintained until at least mid-2024 when the restack is expected to commence planning. Noting that a re-stack is not scheduled to likely begin until 2026.

This letter was written and delivered to the Minister well ahead of the Green Paper's 23rd of May submission deadline because of the concern that, with both stations scheduled to lose our broadcast licences on 30 June 2021, there is limited time to consider our joint submission before we are switched off.

Our request is especially important as Australians continue to be affected by COVID-19. Community TV has continued to be an essential service for local religious and cultural organisations to remain connected to their communities. For a second year, C31 and C44 have provided live-to-air broadcasts over Easter, Greek Orthodox Easter, and Ramadan. These broadcasts have been particularly important for older Australians who do not possess the digital literacy to stream online content.

We will submit that Community TV should be included for the same reasons the Green Paper (on p.3) argues that its proposed reforms are necessary to protect commercial broadcasters: because 'older Australians, the less affluent ... are less likely to use alternatives to free-to-air television ...'; to keep 'Australian stories available on our television screens'; and because, without community TV, 'the volume, variety and quality of Australian content available is likely to decline; audiences will have access to few Australian voices and stories.'

C31 & C44 remain committed to working with the Government towards their vacation of the 600mhz spectrum band and have properly complied with all requests. We have not only fulfilled the remit of Community TV, in line with the Broadcast Services Act, we have over-achieved and shown that we can embrace a digital future while serving audiences that commercial TV is leaving behind.

However, a total transition by 30 June 2021 is neither feasible nor necessary if our current spectrum will not be repurposed until at least mid-2024. Community TV has not been excluded from the sharp revenue declines brought by digital disruption as detailed in the Green Paper. Further, the continuous uncertainty caused by seven short-term licence extensions since 2014, and the ongoing effects of COVID-19 on business opportunities, has been highly debilitating for

both stations in their attempts to retain skilled staff and develop a sustainable post-broadcast business model.

AUSTRALIANS WANT LOCAL CONTENT

CTV is vital to keeping local productions on TV:

- 90% of content aired on community TV is produced in Australia
- As evident by the increased audience reach for CTV, viewers are flocking back to community TV to consume local content. According to official OzTam ratings data received in May 2020, community TV
- Has an average monthly reach of 660,000 (C31 Melbourne) and 266,000 (C44 Adelaide)
- Since the lockdown in March, C31 viewership has increased by 150,000, an increase of 23%, and C44 viewership has increased by 57,000, an increase of 27%, and
- Viewership competes with and regularly beats peer networks, including ABC ME, ABC News, 7Flix, 9Life, 10Peach, SBS Viceland, SBS Food, NITV, SBS World Movies (Melbourne & Adelaide Metro Nightly Av. Share for C31/C44 VS National Nightly Av. Market Share for Commercial Networks)

This is especially important as Australians continue to be affected by COVID-19. In 2021, CTV has again provided an essential service for local religious and cultural organisations, enabling them to remain connected to their communities. For a second year, C44 and C31 have provided live-to-air broadcasts over Easter, Greek Orthodox Easter and Ramadan, particularly for older Australians who do not possess the digital literacy to stream online content.

CTV PROVIDES TRAINING, EXPERIENCE AND PATHWAYS TO EMPLOYMENT

Volunteering in community TV provides community members with accessible opportunities not available elsewhere in the television industry to develop the skills, networks and employment pathways critical to getting jobs in the TV, screen and adjacent creative industries.

C44 enables participation by around 100 volunteers and interns each year, who each contribute at least a day a week to the critical functions of the station, while gaining invaluable experience in broadcast operations, scheduling, marketing and communications, video pre- and post-production, video editing, event coordination, business administration and finance and more.

Some recent C44 alumni job appointments include

- Olivia Henry, an operations and marketing volunteer who is now a journalist at the Australian Science Media Centre
- Matt Pilling-Milne, a sound operator who had worked on many C44 productions was recently hired by Channel 7's Today Tonight program
- Brittany Evans, a sports reporter on C44's SA Sport Show is now a reporter for ABC News
- Eloise Grover, a production and marketing volunteer is now a production assistant at creative agency KOJO
- Callum McLean, a marketing volunteer, has worked with both the Adelaide Film Festival and the Sydney Mardi Gras in producer roles, and

- Warren Luxford, a broadcast volunteer, worked on cameras for the feature *Escape from Pretoria*, starring Daniel Radcliffe, recently produced in SA.

C44 also hosts dozens of interns and students every year through partnerships with UniSA and Flinders University, providing valuable industry experience in all aspects of broadcasting and production roles on several popular programs.

In addition, C44 is developing new partnerships with the creative industries. As part of the South Australian Film Corporation's five-year First Nations Screen Strategy launched in November 2020, C44 is providing up to eight internships each year to provide on-the-job training and mentorship to up to eight First Nations screen creatives. The partnership includes the broadcast of SAFC-supported short films by First Nations filmmakers on C44 throughout the year.

ADOPTION OF MULTIPLATFORM CONTENT DELIVERY

Community TV stations have long-been on the forefront of adopting a multi-platform approach to reaching their audiences, with ever expanding social media platforms, including Vimeo and YouTube channels.

The CTV+ VOD platform has experienced notable delays to its development and release due to the COVID-19 pandemic, but despite this remains on track for its phase one and phase two releases to occur over the upcoming 4-5 weeks.

It is worth noting; the market average for a basic video streaming app can be estimated as costing anywhere between \$75-150,000. Our current expenditure sits at \$60k not including staff development and maintenance hours. As sustainability is our focus, we are looking to ensure appropriate funds are allocated towards the VOD platform as it is unlikely to generate the required revenue to support a break-even existence.

CTV+ smart-phone artwork below:



The CTV+ VOD platform is viewed as having its strongest chance of being a financially viable venture if it is allowed to develop as a complimentary service alongside ongoing retained access to free-to-air television spectrum. This would allow Community TV stations to operate their VOD services in-line with the rest of the TV industry.

CTV MAKES COMMUNITY EVENTS ACCESSIBLE

Community TV makes professional production and broadcast accessible for community groups underrepresented in mainstream media or affected by COVID-19 restrictions. For example, in October 2020 C44 stepped in to save a beloved SA community event hit by COVID-19 restrictions on its 40th anniversary. C44 produced a broadcast of one of the world's most prestigious motoring events, the Bay to Birdwood, enabling fans and enthusiasts to watch over 1,250 classic cars travel the 72-kilometre route from West Beach to the National Motor Museum at Birdwood.

WHY TRANSITIONING CTV TO A DIGITAL-ONLY MODEL IS POINTLESS

CTV has not only met its remit, as legislated by the Broadcast Services Act 1992, it has over-achieved and shown that CTV can embrace a digital future while serving audiences that commercial TV is leaving behind.

A total transition from free-to-air broadcasting to a digital-only model by 30 June 2021 is neither feasible nor necessary if the spectrum CTV currently occupies will not be repurposed until at least mid-2024.

It is not financially feasible because there is simply no viable revenue model for an online-only CTV model. CTV can not feasibly generate enough revenue from digital advertising and subscriptions from the small audiences that local, niche programs attract.

Currently, 80% of C44's revenue comes directly or indirectly through its free-to-air broadcast. In 2020, 55% of revenue was directly related to broadcast programming: program fees (36%) and advertising (19%). The remainder is indirectly related to broadcast, including grants (21%) and partnership income (4%).

C44 cannot feasibly replace 80% of its current revenue this year and it's at a high risk of insolvency by December if it loses its broadcast revenue entirely. To rebuild that revenue by 2024 is a still significant but far more feasible undertaking. Our Digital Transition Strategy 2021-2024 has been created to develop new business to replace broadcast revenue and, critically, provide a sustainable way to continue creating local content, providing accessible training opportunities, and supporting SA's next generation of screen makers.

Nor is the transition feasible from a content or community perspective. While CTV has for years been using digital media including livestreaming, on-demand streaming and social media content to reach and grow new audiences, it will be a monumental challenge to survive with the same cultural strength, output, and value to our local communities without free-to-air. C44 is of value to our community, our university and industry partners, and the broader creative industries because it makes broadcasting accessible.

CTV's inclusion in free-to-air TV landscape is critical for the same reasons the Green Paper (on page 3.) argues its reforms are necessary to protect commercial broadcasters:

- because 'older Australians, the less affluent ... are less likely to use alternatives to free-to-air television ...'
- to keep 'Australian stories available on our television screens', and

- because, without community TV, ‘the volume, variety and quality of Australian content available is likely to decline; audiences will have access to few Australian voices and stories.’

CURRENT TECHNICAL FRAMEWORK

Channel 44 operates on using the main site at Mt Lofty (BA) on UHF RF channel 33. It does not operate any translators. C31 Melbourne currently transmits from the Mt. Dandenong towers on UHF Channel 31 with a relay translator operating at the Como Centre in South Yarra on Channel 42 (via the sixth channel).

Both transmission sites are safe to continue to be used under their current capacity until at least mid-2024 according to the Government’s Green Paper proposal. It is clear that Community TV can continue to carry on under its current spectrum allocation until the digital restack is set to occur.

PROPOSED FUTURE TECHNICAL FRAMEWORK

CTV stations accept the desire of Government to transition broadcasters to more efficient technologies and to reallocate freed up spectrum for other high value purposes.

CTV stations would seek ongoing and regular dialogue with the Department and ACMA on the progress and likely timelines to alternative uses requiring sixth channel spectrum.

The outlined future framework for spectrum allocation contained within in the Media Reform Green Paper does not seem to fully add up. Sustainability does not appear to be the future focus of the proposal. Technological advancements, capacity building and the adoption of future efficiencies will be limited under the current proposed reforms.

DVBT2 would appear to be the only future forward technical step to take to ensure a vibrant free-to-air TV market. If this is to be accepted, the time frame for the adoption of this technology and the uptake of television sets that can receive these broadcasts could be estimated as requiring several years. Some industry estimates sit at this process not being likely to be completed until as late as 2030.

Community TV stations currently use a channel not standing in the way of any implementation of any next gen TV sets. Other channels exist, namely the sixth channel, that could allow for the testing and implementation of these broadcast technologies.

In addition, the required funding for the future transmission framework is listed as being sponsored by the Federal Government but ultimately paid for by the sale of leftover spectrum. This would appear to be back to front as the sale of spectrum and the collection of fund associated cannot be completed until after a digital restack has been completed and remaining available spectrum is quantified.

In summary, Community TV stations would be seeking a scenario where our BSA content licences continue to be set to the usual 5-year terms with the associated RadComms licences extended to match (5 years). This would be in the event a digital restack did not take place before the 5 year licence terms were complete.

CTV stations remain committed to a process that ensures broadcast spectrum is allocated efficiently and at the highest value to the Australian public.

CONCLUSION

We request that urgent consideration be given to our request to include ACTA members C44 and C31 in the proposed re-stack of TV spectrum, or to provide a commitment that both stations' broadcast licences will be maintained at least until the proposed re-stack is scheduled to begin (estimated for mid-2024). This is the only outcome that will enable a shift to a viable digital-first model and build the long-term sustainability of community TV.

It is worth noting that a policy decision, in favour of Community TV, **would not require any Federal Government funding.**

Community TV deserves a place in the longer-term future framework of free-to-air television and to switch off C31Melbourne and C44 Adelaide before the consultation process linked to the Media Reform Green Paper is completed would deny the Australian public an outcome that works in their best interests.

For more information please contact;

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