



FIRST NATIONS
BROADCASTING - DIGITAL MEDIA
AUSTRALIA

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Television Radio Production Broadcasting

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Content Division

Department of Infrastructure, Transport, Regional Development and
Communications

GPO Box 2154

CANBERRA ACT 2601

Website: www.communications.gov.au/have-your-say/new-rules-new-media-landscape-modernising-television-regulation-australia

Submission to Media Reform Green Paper - Modernising Television Regulations in Australia The Department of Infrastructure, Transport, Regional Development and Communications

First Nations Broadcasting Australia (FNBA) welcomes the opportunity to provide input to The Department's Media Reform Green Paper – Modernising Television Regulations in Australia.

FNBA is Australia's largest fully Indigenous-owned and operated television, radio and production (Sea Eagle Production) organisation. Located in Darwin, Northern Territory and was created by Larrakia Traditional Owner and Elder Dr Donna Odegaard AM back in 2005 to provide Aboriginal and Torres Strait Islander people employment within a program developed and implemented by FNBA. The Indigenous Broadcasting, Training and Employment program providing full time jobs for Indigenous people.

Now Australia's largest Indigenous production organisation producing more than forty Aboriginal Torres Striate Islander languages, broadcasting Indigenous cultural content for Television, First Nations TV, First Nations Radio and First Nations National Radio, Vast 913 and additional online and social media platforms. First Nations Broadcasting Australia is committed to the importance of broadcasting not only to the first nations population but also educating the secondary target audience, all people, the importance of Indigenous language and their culture.

FNBA is the only Indigenous broadcasting organisation to have a Cultural Protocol and Ethics Committee within the building approving all content before being broadcast. This service is often utilised by community Traditional Owners, Custodians and Community members within the FNBA Community Consultation Policy.

First Nations TV and First Nations Radio broadcasts one hundred percent Indigenous content that includes, Indigenous languages, culture, community ceremonies, family gatherings and festivals, community cultural events and a variety of Indigenous community sporting events.

Broadcast Campaigns Developed and Broadcast

FNBA has produced and broadcast a number of specialised campaigns for indigenous people including, School enrolment, Back-to-school, further education, employment programs and get a job campaigns, domestic violence, mental health, Indigenous ear health campaigns, social well-being, personal hygiene, drinking smoking and related substance abuse help campaigns and anti-suicide campaigns for youth.

Specialised campaigns produced and broadcast in seventeen different languages include:

- Bush Fire
- Flood Warnings and Advice
- Cyclone advice and Emergency Warnings and Information live
- Land Council Meetings and information
- COVID-19 specifically for Aboriginal Torres Strait Islander Communities (75 different productions)

FNBA has a national First Nations Peoples focus with Community representation across Australia.

Dr Odegaard AM has been instrumental in rolling out the Minister for National Indigenous Australian's Ken Wyatt AM The Voice personally consulting with Indigenous Communities across Australia. This promotion for the visitation has taken place through FNBA announcements on Radio and television.

FNBA is centrally located in the CBD of Darwin (an important geopolitical location), which has the highest percentage of Aborigines of any Australian capital at 9.7% with regular meetings taking place with Traditional Owners, Custodians and Community residents on a regular basis.

FNBA provides a broad range of local and national Aboriginal and Torres Strait Islander news, stories, film, television and radio programmes, from our in-house production studio, now producing more than 40% of the content broadcast. The dedicated news and programmes are shared across the Indigenous broadcasting sector and main stream broadcasters. The content we produce and broadcast is primarily for Aboriginal and Torres Strait Islander peoples and audiences in Darwin and across the country.

First Nations TV currently operates as a Free-to-Air Broadcaster with a High Powered Open Narrowcast (HPON) terrestrial DTV-1 licence, from BAI's terrestrial broadcast

site at 100 Deloraine Road, Shoal Bay Northern Territory, which is shared with the commercial and National broadcasters (see Attachment A). First Nations Radio operates a terrestrial community radio RA-1 broadcast licence from BAI's Deloraine road, reaching the greater Darwin area and throughout Australia through Viewer Access Satellite (VAST) service.

First Nations TV and First Nations Local and National Radio have become a trusted source of Indigenous content, programmes and news, by its viewers and listeners in Darwin and around Australia on the Vast Satellite service. More importantly, we provide a voice for our viewers and listeners, who rely on us to share their stories across our platforms. As a news source and content originator, First Nations Broadcasting provides:

- Local content and Australian programmes in more than 40 Indigenous & Torres Strait islanders' languages, making our content 100% Australian made.
- Diversity and a trusted voice for Aboriginals and Torres Strait Islanders in Australia, from our platforms.
- Local news and content for our viewers and listeners, as we continue to focus on providing relevant up to date local news and programmes that resonates with the communities.
- Capable of distributing our indigenous content nationally (through VAST and terrestrially), providing viewers and listeners access to our content from anywhere in Australia.
- Employment for young indigenous and Torres Strait islanders, providing broadcast media training, where senior members become mentors for new incoming recruits.
- Contributing to our national identity and shared experiences.
- The only First Nations Digital Archive and Resource Centre Including Meta Data and storing on 800 terra Byte Network Administrative Servers with on site and off Site Back up for Historic Footage and Audio files. FNBA developed the technology and the systems to archive ALL FORMS of broadcasting material.

Digital Terrestrial Television (DTT) is an integral part of Australian viewers, touching over 99% of the population. DTT is the most cost-effective way of delivering content to such a geographically dispersed nation, playing a crucial role in communicating our culture, traditions, history, news and emergency information, to our viewers and listeners. Therefore, DTT has become a critical way of communicating into remote rural and regional areas.

FNBA is broadly supportive of the Media Reform Green Paper and encourage the development of a framework and migration strategy that will meet our next technological evolution and maximises consumer benefit.

Following our review of the document, we have the following observations:

- DVB-T2/ MPEG-4 platform would restrict broadcaster's ability to offer content at the quality and levels desired by consumers and restrict broadcaster's flexibility to manage the number of programmes and content quality.
- DVB-T2 with HEVC has become a proven standard globally and would provide broadcasters the flexibility to manage Standard Definition (SD), High Definition (HD) and Ultra-High Definition (UHD) content.
- Migrating to the DVB-T2 with HEVC would allow broadcasters to better compete with SVOD and online platforms.
- DTV manufacturers currently produce DVB-T2 with HEVC/MPEG4 capable smart UHD DTV receivers, with access to online platforms.
- Many global sporting events have migrated their technology to deliver UHD content, such as Olympics, FIFA world cup, Tour de France and other sporting networks with a limited number of games.
- In certain locations of Australia DTV frequency spectrum congestion exists and DVB-T2 with HEVC will provide a path to manage the broadcast spectrum in these challenging locations.

The greater Darwin area does not have a congestion of DTV frequencies and a number of options can be considered. Our preferred options:

- Use existing UHF transmit antenna at BAI's Deloraine road site, Shoal Bay (in block B) for the proposed three Transmitters / Multiplexes and minimise technology migration costs by using the existing infrastructure (see Attachment B);
 - Use existing UHF panel antenna system
 - Use existing feeders
 - Use existing filters with modifications
- Restacking the infill channels at Darwin City and Batchelor from block D to block A or B or C, which will be cheaper to undertake (see Attachment B) compared to upgrading the primary site at Deloraine road.

First Nations Broadcasting provides the following information to be considered:

- The broadcaster's technology must evolve to provide the next generation of technology with the quality consumers expect and want, as the TV panel manufacturers are producing.
- The technology migration path will need to ensure sufficient capacity exists by each broadcaster to provide and manage a mix of SD, HD and UHD channels;
- The use of an efficient and proven technology standard, such as DVB-T2 with HEVC, and develop a plan to drive demand for DVB-T2 (HEVC) receivers while minimising any negative impact to consumers;
- Due to the importance of Darwin (as highlighted above), we feel it is vital that no more than two broadcasters are assigned per transmitter / multiplex as per Metro markets (see Attachment B).

- First Nations TV to continue broadcasting by sharing one of the two transmitter / multiplex assigned to the commercial broadcasters, in Darwin and other metro markets.

First Nations Broadcasting has reviewed the proposed restack timeline and milestones, and feel it is fairly aggressive and an additional 6 months should be allocated towards the restack timeframe. These concerns stem from our observations of the challenges the first restack grappled with (i.e., weather, resources, logistics and lack of test equipment) and the challenges ahead due to the of COVID.

First Nations Broadcasting feels only the broadcasters have a true understanding of our technology aligned content requirements and feel the broadcasters should have the responsibilities to manage and drive the restack project (this would include funding control to manage budget, technical design, selecting contractors, resources and equipment), while working with The Department, ACMA and other broadcasters. As a broadcaster, we look at the restack process to improve our technology and terrestrial broadcast capabilities, not to make a profit.

First Nations Broadcasting is an aboriginal content originator, with the capability to distribute content throughout Australia and would ask the government to consider First Nations Broadcasting to be the first Indigenous owned and operated organisation to transmit our content in metro and large regional markets, by sharing the second commercial transmitter / multiplex.

Thank you for the opportunity to provide our response and as outlined in our response we look forward to further consultation.

Sincerely,

Dr Donna Odegaard AM
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Attachment A

Deloraine road, Shoal Bay
 Broadcast Australia Site
 Current DTV Antenna: SIRA, 8-Level 3-Sided UHF Panel Array Antenna
 Located at about 137m above ground level

Current Channel Configuration
 Unassigned Channel 28
 SBS Channel 29
 ABC Channel 30
 NTD network 9 Channel 31
 TND network 7 Channel 32
 DTD Network 10 Channel 33
 First Nations TV Channel 35

Current Spectrum Block Plan for Greater Darwin Area																																																							
Blocks	Channels																																																						
A	6 (
B																																																							
C																																																							
D																																																							
E																																																							
Area Served	6	7	8	A				B					C					D					E					51																											
Batchelor																																																							
Darwin				DAB+	DAB+																																																		
Darwin City																																																							
HPO -				Narrowcast Broadcaster										First Nations TV																																									
UA -				Unassigned Channel										Vacant																																									
SBS -				National Broadcaster										Special Broadcasting Services																																									
ABC -				National Broadcaster										Australian Broadcast Corporation																																									
NTD -				Commercial Broadcaster										Northern Territory Broadcasters					Joint Venture (Nine / SCA)																																				
TND -				Commercial Broadcaster										Regional Television					Southern Cross Austereo																																				
DTD -				Commercial Broadcaster										Darwin Digital Television					Nine Network																																				

Attachment B

Possible Option for Restack Spectrum in Darwin																				
Com - Commercial Broadcaster																				
	A						B						C							
Area Served	6	7	8	9	9A	10	11	12	28	29	30	31	32	33	34	35	36	37	38	39
Batchelor															SBS / ABC	Com 1 / 2	Com 3 / HPO			
Darwin				DAB+	DAB+				SBS / ABC	Com 1 / 2	Com 3 / HPO									
Darwin City															SBS / ABC	Com 1 / 2	Com 3 / HPO			
Possible Option for Restack Spectrum in Darwin																				
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Area Served	6	7	8	9	9A	10	11	12	28	29	30	31	32	33	34	35	36	37	38	39
Batchelor												SBS / ABC	Com 1 / 2	Com 3 / HPO						
Darwin				DAB+	DAB+				SBS / ABC	Com 1 / 2	Com 3 / HPO									
Darwin City												SBS / ABC	Com 1 / 2	Com 3 / HPO						
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Area Served	6	7	8	9	9A	10	11	12	28	29	30	31	32	33	34	35	36	37	38	39
Batchelor						SBS / ABC	Com 1 / 2	Com 3 / HPO												
Darwin				DAB+	DAB+				SBS / ABC	Com 1 / 2	Com 3 / HPO									
Darwin City						SBS / ABC	Com 1 / 2	Com 3 / HPO												