



C31 - Community TV Melbourne

Response to the Australian Government's Media Reform Green Paper

– 'Modernising television regulation in Australia'

Prepared by

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A BRIEF HISTORY OF COMMUNITY TELEVISION 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 programs, simultaneously 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 have 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 – Stations receive a 1-year extension after a 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 receive 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 representatives from C31 Melbourne, C44 Adelaide and WTV Perth met with Senator Mitch Fifield, the three stations receive a 2-year extension and experience their best period of growth and stability in five years.
- 4 June 2019 – CTV Options Paper is 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 use of the spectrum stations use 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 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.

ESSENTIAL BROADCAST & COVID:

The current global health crisis is having a severe impact on entire sectors, and this is certainly no less true for the Community TV sector.

C31 Melbourne and C44 Adelaide reported that booked production work was postponed until the crisis eased and remains at constant risk of cancellation/rescheduling, as well as demonstrable impacts on critical SME sponsorship revenue. Very quickly, as the realities of the pandemic set in, station management at C31 Melbourne and C44 Adelaide were forced to make immediate staff changes to compensate for the drastic down-turn in income causing further strain on already stretched resources.

However, the current COVID-19 crisis provides a reminder of the importance and potential for Community TV to provide another outlet for communication particularly to multicultural communities as well as vulnerable groups, especially ageing and people with a disability. Whilst online uptake is generally high there are still populations that rely on traditional broadcast channels like Community TV to stay informed and socially connected. C44 and C31 have both seen an uptick in the number of community groups seeking broadcast

services as an alternate way of connecting with their communities when they can no longer meet face to face.

Community TV re-emerged as an essential broadcaster amidst the crisis.

Over the course of the last 12 months, C31's capacity to provide essential services, niche programming and reach hyper-local multicultural audiences has led to a deepening and expansion of C31's role within the Victorian community. Both Federal and State Government media purchasing increased through 2020 and has continued into 2021. This can be viewed as an acknowledgement of C31 Melbourne's niche audiences containing several key community groups not typically reached via mainstream media outlets.

Throughout the COVID-19 pandemic, CTV viewership has increased dramatically. C31 Melbourne saw an audience increase of 23%, whilst C44 Adelaide experienced an increase of 27%. According to official OzTam ratings, in April 2020, during the peak of the health crisis, 1 Million diverse Australians watched Community TV.

LOCAL NEWS & CONTENT + EMPLOYMENT PATHWAYS:

Some facts about Community Television;

- **90% of content aired** on Community Television is produced in Australia.
- CTV viewership competes with and regularly surpasses peer commercial networks including ABC ME, ABC News, 7Flix, 9Life, 10Peach, SBS Viceland, SBS Food, NITV, SBS World Movies.
- Across Melbourne and Adelaide, Community TV stations broadcast over **120 weekly programs**, averaging around **200 hours of locally made content**, made by approximately **1000 volunteers** across the country.
- We broadcast **11 programs per week**, produced as part of Tertiary Institution coursework in Film & TV and Journalism degrees.
- We work with over **40 multicultural producers**, supporting the production of content reflecting and sharing the culture and lifestyles of many diverse communities.
- We accommodate around **140 internships every year**, sourced from diverse backgrounds, providing experience in content production and broadcast operations.
- Programs produced by C44 Adelaide & C31 Melbourne employ local freelancers and give work experience to hundreds of emerging screen practitioners every year. Many of these programs drive immeasurable amounts of dollars back into the local economies they are produced within.
- During the last Federal Election, the remaining CTV stations facilitated the broadcast of 'Election 2019'. Spearheaded by RMIT University & The Junction and funded by the Judith Nelson Fund, the broadcast featured multiple young journalists across multiple states and showcased cross collaboration between

multiple tertiary institutions – the coverage was broadcast live across Australia on CTV and online. *The first Nationally broadcast, student driven coverage of a Federal Election in Australia's history.*

- C31 Melbourne have recently launched our own “[C31 Originals](#)” banner for in-house productions and have a very busy slate of locally produced content being released currently. The projects have been successful in obtaining domestic and internationally distribution and have provided over 50 screen professionals with gainful employment.
- C31 Melbourne supports the **NFP sector** by producing video content for online platforms in support of awareness campaigns. In 2018 C31 produced an online video series – ‘Project 1 Million - I Am Australian’ that has delivered over 1,000,000 views of content with an anti-racism and tolerance message (in partnerships with Children Ground, The Long Walk, Amnesty Australia and All Together Now). In 2019 C31 received ongoing philanthropic support from the *Lord Mayors Charitable Fund* to continue the project through the 2020/21 financial year.
- C31 Melbourne and C44 Adelaide have a **twenty-seven-year history** of providing a platform and a pathway for people of all ages, cultural backgrounds, faiths and sexualities to a career in the Arts. Through the years, the list of alumni who have transitioned from Community TV screens to the commercial networks, both in-front and behind the camera, is endless. Names like Rove McManus, Hamish Blake and Andy Lee, Gorgi Coughlin, Waleed Aly and more recently Dilruk Jayasinha, Aunty Donna, Emmylou MacCarthy (and many more) have made Community TV their training ground before launching into bigger and better things.

MULTICULTURAL & MULTIFAITH CONNECTIVITY & CONTRIBUTION:

C31 Melbourne has a long history of broadcasting diverse programming. During the COVID-19 health crisis, we further developed ongoing relationships with several key groups, including the Greek Orthodox Church, Roman Catholic Church, Victorian Board of Imams, National Ethnic & Multicultural Broadcasters Council (NEMBC), Lutheran Church of Australia, Anglican Church of Australia, Victorian Multifaith Commission and the Victorian Multicultural Commission. Whilst access to FTA is possible, these groups are making use of the valuable broadcast platform to produce and air content that is relatable to their community groups.

Other multicultural programs broadcast on C31 Melbourne include but are not limited to; Bosniak TV (**Bosnian**), Zontas 100% (**Greek**), Entre Todos (**Spanish**), Macedonians in the Aussie Land (**Macedonian**), FardaTV (**Afghani**), Call of the Beloved (**Persian**), Sri Lanka Morning Show (**Sri Lankan**), **Russian** Influence, **Hungarian** TV, **Croatian** TV, Pearl of Lanka (**Sri Lankan**), Good Evening Melbourne (**Greek**), **Chinese** Weekly TV, The Schtick (**Jewish**), Tamil Oli (**Tamil**), Oz **African** TV, Adventure in **Iraq**, **Japan** Video Topics, Australian **Korean** TV, One World (**Russian**), Meraki TV (**Greek**), Bollywood Dance School (**Indian**), Regional **Italian** Cuisine.

The closure of Community TV stations would amount to an incredible loss for Victoria's diverse ethnic communities. For many living in Australia, and especially in Victoria, English is not always a first language. Many culturally diverse elderly have great difficulties in using modern technology, which includes navigating the internet, thus mainstream traditional media outlets are relied upon for connectivity to the outside world.

Community TV stations regularly feature programming in a variety of languages, within programs produced in Australia (not overseas like other public broadcasters). This has been especially crucial during the COVID-19 crisis where at-risk members of the community, like the elderly, were not allowed to attend religious or cultural services. Community TV was there to provide their local viewers with daily services and local news in language providing comfort during incredibly difficult times.

Local, State and Federal governments have come under a lot of criticism for not doing enough to keep ethnic communities educated and informed, especially with COVID-19 developments. With Community TV stations unable to provide these services beyond June 30 this year, many Australians will be severely disadvantaged.

POSITIVE NET IMPACT TO LOCAL & REGIONAL ECONOMIES:

The most watched regular weekly program on C31 Melbourne is **Talking Fishing**. This program, one of ten fishing programs on the station, films live in the C31 Melbourne studios every Tuesday night and has recently completed its tenth season. Not only does the program involve news relevant to the fishing community, it presents product reviews, encourages active and appropriate participation with Victoria's many waterways and fisheries, along with the small businesses that rely on fishing tourism throughout the state.

In the lead up to the most recent Victorian State election, Talking Fishing was the only program to feature live appearances from both [Daniel Andrews](#) and [Matthew Guy](#), and as the Federal Election approached in 2019, they featured [Senator Richard Colbeck](#).

It's clear that not only are Channel 31 fishing programs immensely popular amongst viewers in Melbourne, they have a direct impact on the promotion of Victorian fisheries and waterways. In addition, small business sponsorship of Channel 31 fishing programs has enabled local fishing-waterway related businesses to advertise to their potential customers directly, as opposed to commercial television fishing programs which are filmed nationally and don't specifically focus on Victorian locales.

The economic impact the fishing industry has on regional Victoria is massive and the only free-to-air television network that actively promotes the Victorian fishing industry exclusively is Channel 31 Melbourne. Whether it be promoting the visitation of Regional Victorian towns, helping small businesses to market and advertise, spruiking local boating & fishing manufacturers or providing a platform for State and Federal lawmakers and

legislators to discuss their decisions, C31 fishing programs are instrumental to Victoria's regional economic growth.

Community Television is also the home to some of Australia's very first free-to-air hunting programs with both **Beyond the Divide** (its seventh season now airing) and **Aussie Hunting Adventures**. Both programs are amongst the most popular C31 shows on the air and like fishing, carry with them a considerable amount of local small business support. Hunting enthusiasts across Victoria are very familiar with both programs and are some of Community Television's most ardent supporters.

Community TV helps to foster and feed the growth of a massive Victorian industry. Without Community TV, there is no free-to-air home for hunting in not just Victoria, but Australia-wide.

Channel 31 also has a two-decade long history of airing 4-Wheel-Drive focused programs and many of our producers are Victorian based, showcasing the variety of locations available a short drive from Melbourne. Like our fishing and hunting audiences, our 4WD programs are perhaps our best supported content from a small business perspective. The list of 4WD related small business operators who rely on C31 programs and the associated station sponsorship is perhaps twice the value of our fishing sponsors. Again, it is clear that C31 outdoor lifestyle content drives a huge part of Victoria's economic growth, particularly through Regional Victoria.

In 2019, C31 earned \$619,741 in revenue associated with program sponsorship and traditional station advertising. Roughly 80% of this was earned through small businesses from the fishing, hunting, 4WD and other associated outdoor lifestyle activities. Community Television in Victoria is a huge part of the advertising and marketing landscape for these industries. As Australians are returning to outdoor pursuits and related tourism activities, Community TV still has a crucial role to play.

ADOPTION OF MULTI-PLATFORM 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. It is estimated that the CTV+ platform will generate between 1-3% of the revenue currently generated from free-to-air sponsorship.

CTV+ smart-phone artwork below:



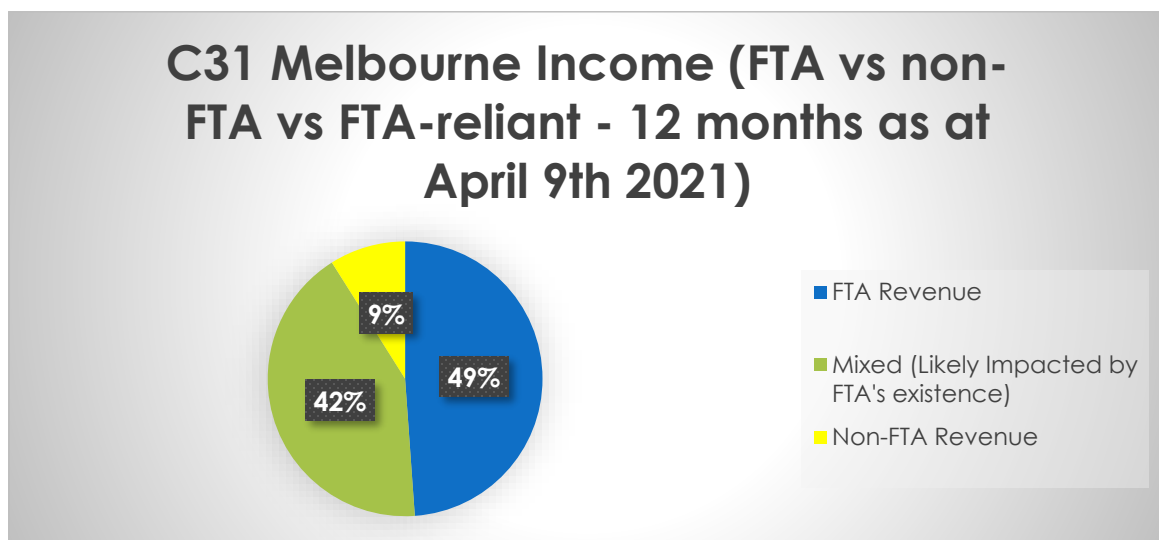
The CTV+ VOD platform is viewed as having its strongest chance of being a financially viable venture if it is allowed to develop as a complimentary service alongside ongoing retained access to free-to-air television spectrum. This would allow Community TV stations to operate their VOD services in-line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

TV IS KING, A BUSINESS MODEL SNAPSHOT:

C31 Melbourne is primarily funded through sponsorship, grants, sale of airtime and member donations. **The station does not receive any regular or direct Government funding.** The annual revenue of C31 Melbourne is approximately (AUD) \$1.4-1.8 million per year. Roughly 80% of that income can be directly attributed to the existence of our free-to-air broadcast signal. This platform continues to be a bedrock for station revenue. High demand still exists from businesses, festivals and community groups to make use of our livestreaming services and unique free-to-air broadcast platform.

Whilst C31 Melbourne can easily demonstrate financial resilience and broad community relevance whilst it retains access to FTA, under the current timelines, a switch off threatens the future of one of the cornerstones of Victoria's media landscape. When considering that the spectrum used by Community TV stations has been confirmed by the Media Reform Green Paper as not being required until 2024 at the earliest, the immediate request for a renewal of the sector's broadcast licences beyond its current deadline could only be viewed as a reasonable and mutually beneficial outcome.

Like all traditional TV broadcasters, C31 Melbourne continues to make progress towards diversifying income streams and lessening its reliance on FTA-only associated revenue, however as the below graph illustrates, an overwhelming reliance on FTA related revenue still exists and would be incredibly difficult to replace in a sustainable fashion under the currently imposed timelines.



With permanent and ongoing access to broadcast spectrum, C31 Melbourne would continue as a self-sustaining community broadcaster with rapidly improving and varied digital initiatives and revenue streams, plus strong Government links and benefits all of which provides 100% locally produced content for relevant and important audiences across our licenced broadcast area.

CURRENT TECHNICAL FRAMEWORK:

C31 Melbourne currently trasmits 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).

We understand that the adoption of DVBT2 broadcast technologies would likely require our Como Centre translator to cease transmitting our signal. In this eventuality we would seek carriage via DVBT2 transmission services elsewhere.

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

It is our view that the outlined future framework for spectrum allocation contained within 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 an implementation of any next generation of 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 funds 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 Australian Community TV Alliance (ACTA) members C31 Melbourne and C44 Adelaide 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 long-term future framework of free-to-air television and to switch off C31 Melbourne 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shane Dunlop', with a stylized, cursive style.

Shane Dunlop

General Manager, Melbourne Community Television Consortium PTY LTD

President, Australian Community TV Alliance (ACTA)