



Regional
Development
Australia

N O R T H E R N T E R R I T O R Y

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Content Division

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To Whom It May Concern

Re: Media Reform Green Paper

RDA NT is an incorporated not-for-profit community-based organisation that is concerned with building partnerships and ensuring that all governments and stakeholders collaborate in developing and strengthening regional communities. RDA NT is part of a nationwide network of 52 RDA Committees with membership comprising local individuals who have a good understanding of the economic, environmental and social issues and priorities in the Territory.

Communications and connectedness are a key regional development issue for the NT and one that will be directly impacted by the proposed Media reform. Consequently, our submission focusses on this area rather than responding to all the consultation questions in the Green Paper.

Connectivity, both technical and social, is a core issue which we do not believe has been adequately considered in the Green Paper. It is our view that forcing the free-to-air (FTA) broadcasters onto 3-4 shared transmission multiplexes (despite the use of compression technologies) will negatively impact upon programming, picture quality and range of content and services provided, including services for those with disability such as audio-description. There is also a risk that the FTA broadcasters will be forced to shift even more content on-line and/or move to fee-based subscription models. We are concerned that any change in transmission technologies from broadcast to narrowcast (i.e. on-line) will further entrench the existing digital divide and have perverse (unintended) impacts upon other Government policy areas such as Closing the Gap and decentralisation.

Access to FTA broadcast television is fundamentally about social inclusion and equity. Since the 1990s there has been an increasing lack of equalisation in television depending upon the consumer's economic circumstances and where they live. As indicated in the Green Paper, around 30% of Australians do not access pay TV. However, what is not adequately acknowledged is that this cohort of Australians is primarily made up of those on low incomes, older Australians, and those living in regional and remote areas, according to research by Tanner and Given (2020). This pattern reflects broader issues regarding digital accessibility and affordability including access to and affordability of internet-enabled TVs, access to broadband (internet connectivity), type of broadband (e.g. FTTP vs Skymuster), type of plan (i.e. affordability of plans with high data allowances and download speeds), and consumer's digital literacy. Despite the introduction of the NBN and Mobile Black Spot programme, the digital divide is real and widening, so any move to online-only TV would effectively result in the loss of what is now a free service as many of these consumers would have to upgrade their devices, internet access and monthly plans. It would particularly disadvantage remote Indigenous communities (many do not have internet access or only have access to shared community wi-fi), other rural and remote communities and businesses who rely on the Skymuster satellite service for their broadband access, and those on low incomes.

Connectivity (the ability to overcome geographic and social isolation) directly contributes to the liveability of regional and remote areas. These areas already experience fewer services and higher costs associated with essential goods and services, making it difficult to attract and retain new residents and workers. Any policy or program reform that results in lower quality FTA television and/or higher costs for consumers in accessing television, is likely to compound the existing population challenges experienced in these regions. FTA TV also plays a critical role in enabling other areas such as emergency management (e.g. during bushfires, cyclones) and public health messaging. They are also key providers of local content which in turn contributes to community identity and cohesiveness.

The NT has already experienced a significant decline in media availability and content over the last few years through the loss of print runs of regional newspapers such as the *Centralian Advocate* in 2020, loss of ABC Radio (shortwave) in 2017, and fewer local (NT based) TV news broadcasts. The proposed media reform will negatively impact upon the ability of many Territorians to remain connected without further costs and/or loss of services. This impact will be most acutely felt in remote areas where broadband access occurs via the Skymuster satellite service; its data and speed caps, latency issues and rain-fade make it challenging to undertake routine software upgrades, let alone to stream content. Even those with UHF are likely to experience fewer television channels if the consolidation of terrestrial TV proceeds as proposed in the Green Paper.

On the matter of creating Trust funds for the development of local content (Create Australian Screen Trust) and regional news services (Public Interest News Gathering Trust) using a portion of the proceeds from the sale of 'saved' spectrum, the Green paper lacks sufficient detail regarding the operation of such Trusts. Mechanisms to encourage greater local content and support the local television and screen industry are welcome but must be sufficiently robust and transparent to withstand future changes in government policy and budget priorities.

Whilst we appreciate the Australian Government's concerns regarding the sustainability of FTA television in an increasingly contested media landscape, we suggest that any future solutions should be underpinned by a commitment that consumers of existing FTA television should not be left worse off (i.e. with poorer picture quality, reduced local content, higher costs less choice and fewer services). Instead of considering this matter with a "one-size-fits-all" solution, we encourage the Government to take this opportunity to consider how it might build better television for the future that is inclusive of all consumers, regardless of where they live.

Yours sincerely



Kate Peake
CEO



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