

**From:** [REDACTED]  
**Sent:** Thursday, 21 June 2018 9:56 PM  
**To:** Competitive Neutrality Inquiry  
**Subject:** Inquiry into the competitive neutrality of the national broadcasters

Dear Commissioners

I tried to make an online submission but the website would not allow me to submit the form. (Error message: "You don't have permission to access "http://www.communications.gov.au/what-we-do/television/form-inquiry-competitive-neutrality-national-broadcasters" on this server. Reference #18.f083e17.1529581745.f43ad6a")

I have copied and pasted my answers to the questions on the form below.

Please keep my submission anonymous.

However, i consent to the content of my submission (other than my personal details) being published online.

My submission follows below.

Regards  
[REDACTED]

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Q8

No. ABC is scrupulous in not breaching its non-commercial rules re promotion of products/ services. The commercial and pay TV/ subscription TV services appear to have substantial advantages over the ABC in acquiring valuable content, including purchasing successful programs/ hiring talented individuals initially developed by the ABC/ TripleJ etc. This presumably reflects the commercial networks' larger budgets as well as lower risk- taking by the commercial networks (only acquiring programs/ talent that are already proven).

Also, the public interest obligations of the ABC and SBS to meet the needs of all sectors of the community place them at a disadvantage relative to their commercial counterparts who can make decisions based solely on profitability, ie what the majority are likely to be interested in.

Q9

See answer to Q8.

Q10

I don't know about this.

Q11

No.

Q12

I don't access as much SBS content as i do ABC. However broadly speaking, SBS' activities appear to complement, not duplicate, those of the ABC. Eg SBS has specific Indigenous and foreign language television and radio content whereas ABC has a strong focus on children and youth TV/radio.

Q13

Yes and as noted in my answer to Q8, both ABC and SBS are required to address sectors of the community that "the market" is unlikely to be interested in due to small size/ low profitability.

As with the commercial networks, the content of ABC and SBS online platforms is closely linked to the content on their traditional TV/ radio platforms. I don't see this as reflecting competition with commercial

online content, rather it reflects the reality for all media outlets that the public now expects them to make their content available through multiple platforms.

Q14

I agree with the guiding principles but another principle should be added regarding the importance of and public interest in having publicly funded independent media as part of the necessary framework for a healthy democratic society. This principle recognises the value of high quality investigative reporting (eg Four Corners) and in-depth analysis (eg Radio National) which are typically not profitable activities, and therefore are not likely to be performed by commercial networks.

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