

# Inquiry into the competitive neutrality of Australia’s national broadcasters

## Submission – Anonymous 15 (21 June 2018)

### Question 8: Considering the commercial activities of the national broadcasters (e.g. where they are selling or purchasing goods and services), is there evidence that they have taken undue advantage of their government ownership, to the detriment of competitive outcomes?

### The recent example of commercial operators competing successfully against SBS for the broadcasting of the FIFA Worldcup is obvious evidence that government ownership offers the national broadcasters no advantage in the procurement or sale of goods and services. If anything the budgetary constraint imposed by government on the national broadcasters often places them at a disadvantage when competing in the open market

### Question 9: What is the differential impact of regulation on commercial and national broadcasters, and is there evidence of consequent adverse impacts on competition and outcomes?

### There are so many codes of practice and other pieces of legislation governing the broadcasting sector (public broadcasters, community networks, commercial networks) it is ridiculous to suggest that adverse impacts on competition are a direct result of any specific differences in the regulation of public and commercial broadcasters.

### Question 10: Is the reporting and accountability by the national broadcasters on their best endeavours to observe competitive neutrality adequate?

### Yes

### Question 11: Are you aware of any specific instances where the ABC or SBS may have received any other competitive advantage, due to their public ownership, to the detriment of a private competitor?

### No. And this idea is a nonsense. Given their budgetary constraints and the high level of government and public scrutiny of the national broadcasters, it is hard to imagine any competitive advantage their public ownership would provide. They have no way of sourcing additional revenue to retain high profile personalities or source high cost content - unlike commercial entities that have multiple sources of potential revenue. In fact it's a miracle that the ABC and SBS have consistently been able to create such high quality services across so many platforms.

### Question 12: The SBS Charter requires it to take into account the activities of the ABC and community television on radio and television. In the context of the competitive neutrality principles how in your view, is the SBS complying with this requirement? From your perspective does it adequately cover the activities of the SBS?

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### Question 13: From your perspective do the national broadcasters seek a balance between competing in the market and complementing the market? Is that balance the same for traditional broadcasting and for new digital platforms?

### The national broadcasters compliment the market through seeking to create and source content that the commercial networks are not interested in - such as science, natural history, social history, current affairs and non-mainstream sports. The national broadcasters are now one of the only sources of Australian drama content - something that the commercial sector stopped providing long ago. The national broadcasters provide a voice for all Australians, of every background, and should be praised for their commitment in this area.

### Question 14: Do you have comment on these guiding principles?

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