

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

## Submission – Anonymous 20 (22 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?

### No.

### 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?

### I don't believe so.

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

Yes, in light of the arguments below.

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.

### 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?

### I take it on trust that they do. Given that community television has been removed from the airwaves, this is moot. That activity removed a considerable degree of diversity and community need that is and was not filled by any other entity. The same goes for the existing radio services, in relation to sbs vs public radio.

### 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?

### How can they be deemed to be competing in "the market" when they do not make a profit. Any advertising done by SBS is to cover costs and was forced upon it for that very reason. The ABC is not seeking to make a profit either and merely covers costs to produce what it was created to do, that is be a national public broadcaster. The notion that the ABC is competing with commercial operators is a totally specious one. The fact that the ABC and SBS offer programming that appeals to the public is as it should be. The fact that they are so apparently popular means there is a need for them surely. Their popularity may be due to their programming excellence, an excellence which may have more to do with their financial independence from outside influence and the influence of the perceived "market" forces that often force commercial operations to produce pap.

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

Yes I do. The ABC fills a cultural, social, political and community need that is not properly filled by any other. Because of the nature of its public funding and lack of a need to answer to its sponsors, it is able to deliver truthful, comprehensive and balanced news and information - as has been evidenced in public inquiries - to the public and to take risks with new creative productions and the purchase of quality programming that other commercial operations are much less able to do because of the political biases of their owners and because of their taking fewer risks with programming and we can see that daily. As a consequence of this the Australian public is able to participate more fully in a democracy and to improve in a cultural and social sense. Without this, news reporting is very likely to be one-sided and this would adversely affect the basic democratic values of our country. The commercial exigencies and operational woes that commercial broadcasters find themselves in, is their responsibility. It is not as a direct or indirect result of any activities on behalf of sbs and the abc.