

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

## Submission – Kim Andrews (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, there is not.

### 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?

### No, the only adverse outcome impacts on commercial operators are as a result of falling advertising revenue, a global phenomenon, and falling standards in commercial channel programming.

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

Completely adequate.

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, but this is asking the wrong question. The role of the ABC and SBS in this society is defined by charter, and their performance needs to be measured in relation to how well they fulfill the requirements to provide accurate and independent journalism, for a socially and culturally diverse population. Our national broadcasters should not be required to lower their standards in response to a lowering of standards in the commercial marketplace simply to maintain the level of competition.

### 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?

### 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?

### From my point of view, the national broadcasters fulfill their charter satisfactorily, making the best programming they can with the resources they have. As the standard of locally produced news and entertainment is so poor throughout the commercial stations, the ABC and SBS should not try to compete with it - otherwise we will have a rush to the bottom which is in no one's interest.

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

The national broadcasters have a clear and important function in Australian society. They must provide accurate and independent journalism, entertaining and informing a socially and culturally diverse population. Their performance should be measured against the requirements of their charter, not against the commercial market which is dominated by global players who have no such requirements and are primarily motivated by movements in their share price. The ABC and SBS have a crucial role in Australian society which must not be weakened or eroded by further regulation servicing external commercial or narrow political interests rather than the public interest.