

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

## Submission – Lynda Gordon-Squire (30 April 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?

### I do not think so.

### 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?

### While all broadcasters are regulated to some extent, the national broadcasters have additional requirements to meet. I do not believe that there is any adverse impact for the private broadcasters other than those of their own making. If the ABC and SBS manage to make programs that appeal to consumers surely that is what they should do. The private broadcasters are free to make quality programs should they wish to do so.

### 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?

### To the contrary, I believe neither the ABC nor SBS are actually in competition with their private competitors. They provide a public service which results in a much higher standard of program than the private channels, despite their huge advertising revenues. Consumers of ABC and SBS generally are not likely to be consumers of the sort of program delivered by the private networks.

### 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 am not able to comment adequately on radio but I believe that SBS and ABC offer quite different television programs which do not compete with each other but provide a broad base from which consumers may choose. Thus they do not compete with, but complement, each other.

### 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?

### I do not think the national broadcasters are in competition with the private broadcasters. If indeed they were they are at a severe disadvantage rather than being advantaged by their always-at-risk public funding. I believe the national broadcasters complement the market and provide a service to those of us who prefer a better quality of programming than that delivered by the private broadcasters whose primary aim is to accumulate advertising dollars.

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

The comment I wish to make loud and clear is that these 2 broadcasters are valued very highly by many in the community. Consumers of ABC and SBS will never be satisfied with the programs offered by the private broadcasters and will only turn in other directions to satisfy their listening or viewing needs. Therefore weakening or dismantling the public broadcasters will not increase the influence of the private broadcasters.