

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

## Submission – Sandra D Clague (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?

### I don't know of any evidence. The products available are direct offshoots of their programs whether from radio, TV or their streaming services and not generally available elsewhere. eg Children's toys, CDs, DVDs and books relating to such popular programs as Peppa Pig, Play school etc and direct broadcasts and recordings of classical concerts from Australian sources as well as overseas(through sharing arrangements) which would otherwise never be available. This is especially valuable in regional areas where such material would otherwise never be available and opportunities to attend live performances extremely rare.

### 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?

### The only differential impact of regulation could be caused by further loss of funding to the national broadcasters forcing them to compete by providing popular programs appealing to the widest audience instead of the high quality news, current affairs and drama that are required by their charter. They also play a valuable role by providing coverage of less popular and women's sport and indigenous matters. The streaming of their broadcasts should not be seen as competition to other services, but as providing the public with their right of access to the public broadcaster now that this is the preferred option for many people.

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

I believe so. If anything, they are subject to far more scrutiny than any commercial broadcasters and are accountable.

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?

### I am not of aware of any specific instance. However, whenever any of the minor or women's sports that have been promoted by either the SBS or the ABC, become popular enough to be commercially viable, they are rapidly taken over by a commercial broadcaster. eg Netball, women's basketball. This certainly is to the benefit of the particular code.

### 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?

### Reduced funding may be forcing SBS to look to a more popular style of programming as well as the need to attract enough audience to keep up advertising revenue. It would be difficult to be entirely competitively neutral when required to compete for the advertising dollar.

### 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 think that the national broadcasters complement the market by providing quality and in depth programming with content that would not be provided by the commercial broadcasters. Not being beholden to advertisers gives the freedom to provide programs such as the Checkout, Trust Me I'm a Doctor and similar programs with the freedom to be critical on health and lifestyle issues that may conflict with commercial promotions. On radio, there are regular discussions with experts on matters that are possibly too contentious for a commercial broadcaster. This applies equally to all platforms as streaming is now replacing conventional program access for many people.

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

I consider that the public broadcasters should be fully supported in their roles of providing a wide range of quality media services as they currently do, including embracing all the improving technology that will enable full access to their services by as many Australians as possible.