

17 March 2006

The Secretary
Standing Committee on Communications,
Information Technology and the Arts
House of Representatives
Parliament House
CANBERRA ACT 2600

To whom it may Concern,

RE: COMMUNITY BROADCASTING INQUIRY

I would like to firstly thank you for the opportunity to respond to your inquiry into the valuable contribution that Community Radio plays within Australia.

As a means of background information, Light FM is a capital city community radio station broadcasting in Melbourne Victoria. The station commenced its first test transmission back in 1980 and was awarded a permanent FM license in December 2001. The license granted is to serve the needs of the Christian community of the wider Melbourne area.

Upon winning the long sought after permanent license, Light FM has experienced strong audience growth. In our short history of broadcast since December 1 2002 we have gained a weekly cumulative audience of 170,000 as indicated by McNair Ingenuity Audience Research (2005).

Below I have commented on the specific terms of reference that the inquiry will investigate on, sharing our experiences and insights. Please feel free to contact me should you have any comments or further questions regarding this submission.

Yours truly,

Phil

Philip C Gray
General Manager

89.9 Light FM

COMMUNITY BROADCASTING INQUIRY:

89.9 LIGHT FM

1. The scope and role of Australian community broadcasting across radio, television, the internet and other broadcasting technologies.

It has been exciting to witness the phenomenal growth of Community Broadcasting over the past 20+ years. For us at Light FM (formally 777 Communications), it was the dedication of volunteers who sacrificed paid employment and worked tirelessly for the cause and mission of the station, believing that one day their efforts would be rewarded with a permanent FM community license. Today, our radio service has grown to become a significant source of encouragement, entertainment and a real asset to the community in which we broadcast.

As we all would acknowledge, the principal role of a community radio station is to provide a service and cater for a community of interest that is not being served by the commercial sector. In our setting, we believe we are meeting the needs of the Christian community, an organized community of people representing 8 – 12% of the nation who attend a Christian Church service each week. As a predominately music station, Light FM provides a format that is appealing to people who identify themselves as Christian. Many of these people may choose not to attend a Christian Church, yet they still identify with Christian values and they listen to the station as they value the positive contribution the station makes to their lives and the community at large.

In summary the role of Light FM is to provide a station that is meeting an un-met community need. Without Light FM, there would be no radio station in Melbourne providing content for the Christian community and for people who identify with Christian values.

Beyond meeting an un-met need, the *scope* of community radio and in particular Light FM is enormous and contributes to the community in numerous ways, such as:

- **Local content:** Light FM gives access and air time to countless community groups that simply would not have access to the air waves on commercial radio. The station also supports local music and promotes the initiatives and activities of local community groups, through community service announcement and low priced sponsorship announcements. Quiet a number of now nationally and international recognised Christian recording artist and bands had their careers kick started by opportunities provided by our station, in particular our popular OZ music show called the Green Room, Monday – Thursday 10pm-12mn.
- **Volunteer opportunities:** Community radio provides an opportunity for aspiring people to enter the dynamic world of media and provides volunteer opportunities in all areas from administration, sales, programming, production, promotions, fundraising and announcing. Without community radio, members of the community would be starved of this opportunity as commercial radio offers limited opportunities for volunteers.
- **Community access:** We continually ask our listeners and supporters the rhetorical question, “Do you know you own a radio station”? We continually remind them that Light FM is ‘owned’ by its members, the station is not controlled by shareholders looking for financial dividends. As a member driven station, it is the community who have access to the station and can contribute comments on the direction of the station, the programming and the standard of such.
- **Career Opportunities:** Over our three years, Light FM has trained many people who are interested in a career in broadcasting. We currently employ 17 staff. A number of our on –air volunteers have gone onto paid employment in the station and/or have moved onto careers in commercial radio.

To truly understand the scope and value that we play in our community, you only have to imagine what it would be like if the station didn't exist...

- There would be limited or no 'voice' on radio for the Christian community, those sympathetic with Christian values and "Not for Profit" Christian and other community organizations.
- No volunteer opportunities for people who are interested in radio.
- No training and development of people in support careers that are aligned to Christian broadcasting.
- No career opportunities for people looking to combine their skills in radio with their personal faith.
- There would be limited or no airplay for contemporary Christian music and no investment in up and coming songwriters, performers and bands, that identify with the Christian message and ethics
- Interestingly in America, contemporary Christian music is one of the fastest growing sectors of music, out selling country music. If Light FM didn't exist, this genre would not receive airplay in our part of the world. (Christian radio in the United States has also been identified as the rising program provider of choice in the wider community).

The internet plays a vital role in the operations of Light FM. We have used the internet to develop a online community of Light FM listeners who interact with the station and each other. The website also provides links and addresses of local Churches and other groups who the station partners with.

The internet also provides the station with the opportunity to stream our programs live, with improvements to this service and promotion of it, we believe this will enable our listeners and supporters locally and around the world, access to a great Australian community radio station.

2. Content and programming requirements that reflect the character of Australia and its cultural diversity.

Light FM provides content that is relevant to our community of interest, namely the Christian community. The station provides a music format that is a mix of contemporary Christian music and positive mainstream or secular music. Rather than playing a 100% Christian format, the station aims to appeal to people who are looking for a real 'positive alternative'. These are the people who may identify themselves as Christian but do not attend or rarely attend a Christian Church.

One of the strongest feedback comments that the station receives regularly from listeners is that people love the fact that we are different to commercial radio. A common quote from listeners is "I love the station, because I can leave it on and know the music and announcers won't be potentially offensive or rude".

Light FM doesn't play music which is offensive in lyrical content or theme, and our announcers do not swear or put people down in any way. The 'positiveness' of the station means that the station is accessible to a large demographic of people, particularly families who are looking for content that is relevant, entertaining, yet safe. We provide that alternative.

Community radio stations like Light FM, allow for a diverse programming content, unlike some commercial radio stations. While predominately a music station, we also provides a mixture of

talk programs, interviews and different genres of music that appeal to a wide target market of 25-49 year olds.

3. Technological opportunities, including digital to expand community broadcasters networks.

There is no doubt that one of the biggest opportunities and threats to community broadcasters will be the roll out of digital radio. Clearly from our perspective, digital radio could present the opportunity for Light FM to provide similar programming in a new media as well as potential multiple format streams of content that would better meet the wide and often diverse needs of the Christian community in Melbourne.

It is our understanding that current permanent licensed community radio stations will be offered 128 kb/s data stream, as for commercial radio. However this is only our assumption and we are unclear on the final allocation of data stream bandwidth to community radio.

The recent statement in the DCITA media release "Framework_for_the_introduction_of_digital_radio" which states "Jointly, wide-coverage community broadcasters in any market will have access rights to 128 kbps per analogue service (up to a maximum of 256 kbps per available multiplex) on the basis that they collectively determine how this is to be shared" has left community broadcasters uncertain of the intent of this statement.

Due to the different wording to the guidelines for commercial radio in the media release, there is concern in the community radio sector that we will be dis-advantaged with respect to the commercial services. The concern is based on much speculation that a different set of rules may be implemented for community operators and may lead to the knobbling of our ability to deliver digital services with the same technical integrity as the commercials. Listeners expect parity of quality as in the case of services on the FM broadcast band. A different approach in the new digital medium could generate adverse reaction from our listeners.

This is a major concern, especially as Light FM seeks to maintain high professional standards in all areas of operations, as is demanded by our listeners and members. A reduction in this quality in parallel media would be a major setback in maintaining that integrity of service to all takers.

We would be concerned also if in the rollout of digital bandwidth, all community radio stations were 'lumped' together. The most difficult and unprofitable outcome would be Light FM having to share channels with another station, whereby listeners may have Christian content playing in the morning, followed by ethnic broadcasting on the same channel in the afternoon. From our perspective it is critical that the rollout of digital radio does not exclude or minimize the available channel bandwidth given to community radio. If anything with the growth in stations like Light FM, community radio should be given at least the same availability to bandwidth as commercial radio if not more. Currently our audience is of the order of 170,000 people per week (McNair Ingenuity Audience Research 2005), and if we were excluded or offered limited digital spectrum, our main concern would be that the station would no longer be able to adequately service our community of interest in this new and emerging parallel and superceding medium.

A more positive outlook recognizes that digital enables a more flexible delivery medium. Currently we only have the one FM frequency, and our content is limited, in that we are aim to meet the needs of the entire Christian community on the one channel providing suitable programming to satisfy youth through to families, and the mature aged. As you can imagine, this is quite a task.

In the case of digital broadcasting, with the possibility of multiple streams of programming, the station could offer different streams covering more specialized programming including:

- Youth programming;
- Christian teaching and worship programming;
- Family programming; and
- Mature aged listener format.

When you consider that with just one FM frequency we currently endeavour to meet the needs of 170,000 people weekly then the opportunity of utilizing multiple digital channels would be to satisfy and better serve the more diverse sub-sections of audience in our community of interest through additional and more specialized content.

4. Opportunities and threats to achieving a diverse and robust community of broadcasters.

As a station we are concerned about commercial radio's attitudes to community radio. From our experience commercial radio are happy for community radio to exist, providing they do not impact the community in any obvious way. As soon as a station strives for excellence in programming, sponsorship and marketing, to better serve the demand of their community of interest as we are charged to do, and to produce a positive result for their community of interest, it would appear that such stations can then become a "target" for commercial radio entities who do not wish to see any impact on their market share or financial revenue from that same market.

I have heard this comment repeated by other community radio and television stations. We, nor do any community radio services exist to compete with commercial radio. We do, however, exist to provide the highest quality service to our community of interest. Our listeners (many of whom donate significantly to the station) expect excellence in our broadcasting service, in regard our programming and presentation.

The core issue is that we are providing quality services that the commercial stations do not understand or are interested in, but these are of significance to the community of interest and wider community, which in turn generates interest.

We for instance cannot see the value in having to tag every single sponsorship announcement with "station sponsor" or "our sponsor" to avoid breaching our licence conditions. Our audience knows we depend on financial support from sponsors and that we run sponsor announcements to obtain financial support for the station. Doesn't it go without saying? The tag serves no purpose and is both a significant compliance burden, and represents a significant risk to our licence if we inadvertently omit the tag. In our view, and that of other community broadcasters we have regular contact with, the requirement to tag should be retracted and community radio should be permitted to broadcast advertisements, within the limitation of the existing 5 minutes-per-hour rule.

Another threat to a community radio station is the inconsistencies in the ACMA guidelines regarding sponsorship announcements and support given to the community of interest. We would be strongly recommending a review of the sponsorship guidelines and would welcome the opportunity to submit a paper on recommendations for changes to the sponsorship guidelines. It would greatly assist community radio if the ACMA were empowered to issue binding rulings and exemptions about specific sponsorship or advertising issues. That would give more regulatory certainty.

This would alleviate the sense of being continually “hamstrung” by grey areas of regulation.

It is very difficult to operate in a situation where the rules for program presentation for commercial and community broadcasters are completely different and appear to be enforced with a different value system, and completely different code of ethics. This generates a “stilted” “incomplete” or “substandard” presentation of what would be considered appropriate information in a number of our programs .

In one instance, we were prevented from mentioning to our community of interest about a play , made by a “Not for Profit” organization, whose target audience was effectively our listeners. Our listeners would have valued this information, but we were advised that such mentions would constitute an “advertisement”.

We are currently constrained in our ability to communicate many of these type of events, or even programs, particularly in the case of Not for Profit organizations who are unable to pay for such a mention, even though their activities are in support of and of great value to our community of interest.

As a sector (Australian Christian Broadcasters) is a well organized collective of stations across Australia. In the future, we see many opportunities for networking of programs that would greatly improve the quality of community radio stations across Australia, particularly in rural areas. Again the laws relating to programming, networking and sponsorship would need to be reviewed and hopefully freed up.

Light FM like many other permanent, licensed, capital city, Christian stations, is experiencing very strong listener growth and support from the community. The vital contribution the station continues to play in our community presents opportunities for our community to participate and enjoy a high quality radio station. The future rollout of digital radio as mentioned above needs to ensure stations like 96five are not excluded and the vital role the station plays in our community continues to thrive in the future.