



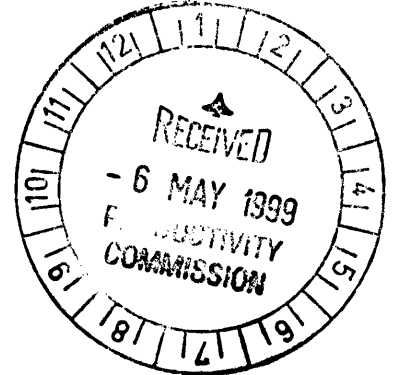
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4th May, 1999

Broadcasting Inquiry,
Productivity Commission,
Locked Bag 2, Collins Street East PO,
MELBOURNE. VIC 8003



We have recently received a copy of the Issues Paper March 1999 on "Broadcasting", and as the licensee for 4BAY, we would like to make the following submission.

With the Social Dimensions of the Public Interest:

- "Does the framework of broadcasting policy meet the needs of Australian children?" (Page 13)

Response: The deregulated nature of broadcasting appears to allow some radio stations licence to broadcast "filth" and CD's containing obscenities. For example this applies to 4JJJ and 4ZZZ in Queensland to a large extent. If children's interests are to be protected an enforceable code of practice should be introduced, particularly as it is young people who predominantly listen to the above stations.

- "Do different regulatory regimes and spectrum availability for different types of broadcasting effect the ability of community groups to broadcast effectively?" (Page 13)

Response: Yes. With the proliferation of narrowcast licences being granted it is impossible for 4BAY to monitor this situation effectively for the following reasons:-

- (a) The ABA has already informed us following enquiry that it is up to 4BAY to monitor the power output if we believe a local narrowcaster is exceeding what is available to them. This is impossible as we do not have the necessary equipment nor can we afford to purchase it.
- (b) The ABA has informed us that there is nothing they can do about a narrowcaster who joins licences together in a string between suburbs and then call themselves a "broadcaster".

continued:

(c) To be an effective community broadcaster 4BAY should not have to constantly be explaining to prospective sponsors the difference between 4BAY being the "local" station which can be heard within a given area; and narrowcasters in the area who gain permission to broadcast within a 10km radius and then call themselves a "broadcaster" in the local press.

- "To what extent does availability of, or access to, physical infrastructure affect community broadcasting?" (Page 13)

Response: To date 4BAY has not been adversely affected in this regard. However, as a sector within the industry, community radio is the least financially able sector to gain access to and provide suitable studios for their needs. This is due to the Government's expectation that community radio will function in a non-profit fashion with volunteers providing the means of not only carrying out the broadcasting function, but also to raise all monies required to keep the station afloat.

- "Is broadcasting policy achieving Australian cultural objectives?" (Page 14)

Response: Community radio has as a principle for broadcasting that Australian talent and music is to receive a minimum percentage of air play. In the commercial field, particularly in television, the airwaves are saturated with content from overseas, much of which is extremely poor in standard. Daytime television therefore promotes a culture (i.e. USA) which is not conducive to the objectives of achieving an Australian cultural identity.

With the Economic Dimensions of the Public Interest we would make the following responses:-

- "To what extent are broadcasting services, widely defined, likely to become business services, rather than education, entertainment or information services? Is Australia's regulatory regime adequate to deal with the issues that are likely to emerge?" (Page 15)

Response: At 4BAY the difficulty with this is the focus on competing with other so-called broadcasters for sponsorship dollars to keep the station afloat. This overrides the programming objectives and energy of the volunteers on the Executive Committee. The current regulatory regime appears to foster this situation rather than to alleviate it.

- "Are advertising markets becoming more or less fragmented between alternative media?" (Page 15)

Response: Yes. Particularly with the advent of narrowcasters in our local area.

continued:

- "How are advertisers responding to the increasing range and diversity of broadcasting services?" (Page 15)

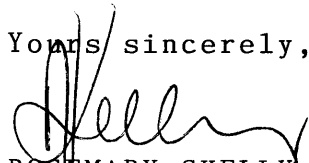
Response: Advertisers are confused and they don't know who to believe when narrowcasters claim they can be heard all over Brisbane rather than a confined area with a narrow audience focus.

With Planning and Licensing New Services, we would make the following response:

- "What progress has been made in spectrum planning by the ABA?" (Page 26)

Response: We have been waiting for over 12 months for a reply to the ABA's proposed plan to increase power for 4BAY. Our letters go unanswered, which is strange as the ABA asked 4BAY to make a submission in the first place.

Yours sincerely,



ROSEMARY SKELLY
Secretary/Administrator
BAYSIDE COMMUNITY RADIO ASSOCIATION INC