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Australian Film Commission Comment on the digital reviews

The AFC would like to provide brief comments on the reviews into Broadcasting Bands Spectrum: Identification and Efficiency and into Underserved Regional Television Licence Areas.

It is not the AFC's intention to comment on the technical aspects of these reviews, rather to make some general comments on the policy framework within which the reviews should be being conducted.

In previous submissions the AFC has expressed the view that the basic principles and objectives, which underlie the Australian broadcasting system also need to be at the forefront of consideration for all the digital reviews. Importantly the AFC considers that the social and cultural objectives of broadcasting need to receive equal consideration and weight with the economic and technical objectives that seem to be more explicitly stated in these two reviews.

The social and cultural objectives are a central part of Government policy which are made explicit in the regulatory framework of the Broadcasting Services Act 1992 ('BSA') and in the entire Government program to deliver support to the creation of Australian film, television and broadband media. An integral part of fulfilling the Government's cultural policy objectives is support for Australian film and television that speaks to the Australian community and the world.

The social objectives of broadcasting include the provision of wide access to news and information; fair and accurate presentation of political speech and matters of public interest; responsiveness to community concerns and not promoting or enhancing divisions within the community; and respect for community standards of taste and decency, paying particular attention to the needs of children and their protection from harm.

The cultural objectives of broadcasting encompass the ideas that broadcasting will contribute to the development of a vibrant sense of national identity; reflect the diversity of cultural expression within the community; contribute directly to the preservation of cultural heritage and endeavour to promote a degree of excellence and quality in its output.

The objectives incorporate the idea of broadcasting as being both a kind of trustee for existing cultural expressions, ensuring that they are kept alive

for future generations, and that it will be an active participant in the creation of a strong national culture that builds upon what has gone before.

These basic principles remain as relevant today as when they were first articulated in the BSA.

As with the other digital reviews these two reviews have in common that new services might be made available to Australian consumers, either through more efficient and effective use of the spectrum or through the provision of additional services in underserved areas.

We approach the prospect of the introduction of new services from the perspective that they must not compromise the social and cultural objectives we have discussed above. We are of the strong view that the broadcasting industry must continue to be able to deliver to Australian audiences high levels of Australian content, which are not compromised in its quality or in its diversity.

The prospect of new services arises chiefly from the ability of digital technology to more efficiently use the radio frequency spectrum available for broadcasting – a public resource.

Changes to the structure and delivery of broadcasting should only be made if the effect is a better outcome for all stakeholders – the public, broadcasters and the creators of programming. Economic and technical efficiency should not be the only measures of whether the broadcasting system is being improved. In particular competitive market based solutions do not always deal effectively with the cultural and social objectives of broadcasting.

As a basic principle, the AFC believes the outcome should ensure all Australians have access to the full range of content available including all Australian content.

The Australian Government must look to the right combination of regulatory intervention, competition policy, support for creativity and technical innovation can be used to foster a broadcasting system in Australia that continues to produce social, cultural and economic benefits to all Australians.

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