



Australian Communications and
Media Authority
**Five-year spectrum outlook
2017-21 Consultation**



Response of the Indigenous Remote
Communications Association



December 2017

This submission is made by the Indigenous Remote Communications Association (IRCA) following sector consultation. It is expected that some radio services, RIBS and RIMOs will make individual submissions in which case the IRCA Submission should not be taken to displace those submissions.

About the Indigenous Remote Communications Association

The Indigenous Remote Communications Association (IRCA) is the peak body for Indigenous media and communications. It was founded in 2001 as the peak body for remote Indigenous media and communications. In late 2016 it transitioned to the national peak body for First Nations broadcasting, media and communications.

Up to 105 Remote Indigenous Broadcasting Services (RIBS), 33 additional licensed retransmission sites across Australia, 8 Remote Indigenous Media Organisations (RIMOs) and 28 urban and regional First Nations radio services are eligible for representation by IRCA.

About the First Nations broadcasting and media sector

First Nations broadcasters are not-for-profit community organisations providing a primary and essential service to their communities. They reach nearly 50% of the Australian Aboriginal and Torres Strait Islander population, but are prevented from providing a primary radio service to all Aboriginal and Torres Strait Islander

peoples due to a lack of funding.

First Nations broadcasters and media producers also connect non-Indigenous communities with Aboriginal and Torres Strait Islander people and culture, developing greater understanding and building stronger relationships.

The sector:

- Comprises:
 - Radio services able to reach around 320,000 First Nations people, including around 100,000 very hard to reach people in remote Indigenous communities, or approximately 47% of the First Nations population.

- A wide range of First Nations news and current affairs services including:
 - National Indigenous Radio Service (NIRS) and its National Indigenous News and Weekly News-in-Review
 - Central Australian Aboriginal Media Association’s news service, including its Strong Voices program.
 - Koori Radio’s news and current affairs programming
 - NITV News and Living Block
 - Print media including Koori Mail, National Indigenous Times, Land Rights News
- A regional satellite TV service reaching 240,000 remote households and a free to air national TV service.
- Over 230 radio broadcast sites across Australia.
- Is a multimillion dollar industry with over 35 First Nations community owned and managed not for profit media organisations.
- Holds the capacity to be a preferred supplier for all government messaging to our communities.
- Is the most relevant and appropriate service with the highest listenership, community engagement and local ownership of all media services.
- Is delivered in the first language of many remote peoples.
- In remote communities, is the most reliable and ubiquitous radio and media services.

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Response to ACMA Consultation Questions

1. Will the proposed structure of the work program assist you in your business planning?

In short yes it will, although it is to be noted that from the perspective of IRCA, that we are more concerned with planning and reform issues for the First Nations community broadcasting sector. We are specifically interested in broadcasting spectrum of course.

Areas of concern and interest include:

- Implementation of the outcomes of the Spectrum Review
- ACMA's advisory role in relation to Ministerial policy for broadcasting service bands
- ACMA standards, codes, guides, etc relevant to broadcasting
- Licence area plans and broadcasting spectrum planning

In relation to the broadcasting service bands and licence area plans, we take this opportunity to draw attention again to the lack of spectrum for First Nations community radio broadcasting in capital cities such as Adelaide and large regional towns without a primary First Nations radio service.

The ACMA FYSO will provide useful information on spectrum for broadband. First Nations broadcasters have a strong interest in the provision of affordable and appropriate broadband in regional and remote areas to support connectivity for remote maintenance of broadcasting and transmission equipment, sharing of content between broadcasters and the provision of mobile platforms for the delivery of broadcasting content. IRCA notes a specific interest in 5G for its potential in the context of the Internet of Things and management of remote equipment.

2. Does the content provide adequate detail for you to engage with the ACMA's planned work in a meaningful way?

It would appear from the content of FYSO 2017-2021 that it will, as long as the FYSO document remains live and updated annually. Of course it goes without saying, the longer lead times for consultation the better. However, we would like to see forward planning

work on LAPS included in the FYSO.

3. Does the consultation process provide sufficient opportunity for you to contribute to the work program?

It would be useful to have ACMA contacts against projects, activities and consultations, and ensure continued hyperlinking to relevant documents to enable follow up and engagement. We would like to see the work program include an indication of the release of any analog community radio broadcasting spectrum availability.

4. Do you have a preference for how the ACMA should communicate changes during the period of a work program?

We would prefer email updates for major changes and additions.

5. Does the inclusion of a forward allocation work plan by the ACMA assist with the planning of your spectrum and network technology decisions?

Yes. We do note however that we would like to see, additional to inclusion in the FYSO, an email notification system for community broadcasting organisations where analog community radio broadcasting spectrum becomes available.

6. Do you have any comments on the scenarios? Are there other scenarios you believe warrant identification and particular attention at this time? Why?

No comments.

7. Is there interest in the ACMA running sequential staggered allocations over the next four-year period?

We would think that the timing of allocations, although obviously needing to be staged according to ACMA capacity and standards availability, should be guided by consumer and provider demand.

8. Which bands would you like to see prioritised for allocation under the planning scenarios? Why?

We are encouraged by the ACMA's actions with regard to 5G. In relation to the broadcasting service bands and licence area plans, we again take this opportunity as noted above to draw

attention to the lack of spectrum for First Nations community radio broadcasting in capital cities such as Adelaide and large regional towns without a primary First Nations radio service. We would like to see a priority program for finding spectrum in the broadcasting spectrum bands for First Nations radio broadcasting in appropriate areas without a primary First Nations radio service.