

Proposal to streamline the B66 form for renewal of a community broadcasting license



Response from First Nations Media Australia



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[First Nations Media Australia](#) (FNMA) is the peak body for the First Nations media and communications industry. Our purpose is empowering Australia's First Nations people through our culturally connected media industry. Our head office is in Alice Springs, complemented by some team members working remotely from different corners of the country.

First Nations Media Australia supports and amplifies the First Nations media sector and its objectives. Our activities include resource and policy development, skills development, networking events and meetings, content-sharing, promotion, regular communications, annual awards, research activities and representation. As part of its industry leadership role, FNMA seeks to ensure First Nations communities have access to information required to make informed decisions, including access to public resources such as broadcast spectrum necessary to provide timely and relevant information to First Nations communities.

As at May 2021, FNMA's membership includes 62 organisations and 167 individuals who work in or alongside the industry as broadcasters, freelance journalists, photographers, filmmakers and allies.



[Introduction](#)

FNMA appreciates the ACMA's commitment to ongoing consultation and the opportunity to provide feedback on the proposal to streamline the B66 form for renewal of a community broadcasting license. FNMA has been encouraging the ACMA to reduce any unnecessary administrative burden on both licensees and the regulator in the license renewal processes for both ongoing and temporary community broadcast licenses. In this context, we are very pleased to note the ACMA's response to these requests and the measures taken in the draft license renewal form toward those objectives.

FNMA supports the ACMA's intention to collect essential information for license renewal decisions more efficiently, and to request additional information where required. Comments on specific questions within the proposed B66 form are outlined in the next section. This response provides comments on the sections of the consultation draft that relate to radio broadcasting within the First Nations media sector.

[Comments on the draft streamlined form](#)

[Lodgement information](#)

1. FNMA supports the additional of contact information for queries in the notes to the B66 form.

[Section 1: Licensee details](#)

2. FNMA suggests the addition of an additional contact person on the B66 application as a secondary contact should the preferred contact move on

from the organisation. Over the course of 5 years, it is quite likely that a volunteer Chairperson/President and/or other senior personnel within a not-for-profit organisation may change. Contact details for an additional person may reduce the ACMA's administrative burden in reaching relevant licensee personnel with key communications and future license renewal information.

Section 2: Community interest and service

3. FNMA supports the proposed reduction of questions in this section.

Section 3: How is the service meeting the existing and perceived needs of the community in the license area?

4. FNMA supports the proposed changes to this section. For clarity, we suggest the addition of a line to question 8.B to the effect of:
ie. what does your station do that other radio services don't do in your area?

Section 4: To what extent does the service provide material of local significance?

5. FNMA supports the simplified format and wording in the questions within this section in broad terms, however it encourages the ACMA to collect some standardized programming data through the license renewal process.
6. FNMA suggests the inclusion of indication of the total number of locally produced hours of content in an average week may be valuable information for monitoring trends in broadcast activity if shared at an aggregated level.
7. Rather than reinstating the table used in this section under question 10 in the current B66 form, FNMA suggests this section includes:
 - a) total hours of local content produced content broadcast; and
 - b) total hours of content produced by Aboriginal and Torres Strait Islander broadcasters.
8. While FNMA does not want to overburden either the ACMA or licensees with collecting unnecessary data, we note the license renewal process is a rare opportunity to track the representation of Aboriginal and Torres Strait Islander broadcasters across the community radio landscape. This data could feed into the Closing the Gap data-gathering processes in an ongoing way as one of the few nationally standardized data points to track media representation. FNMA would like to see this data gathering extended to all broadcasting license-types, not only community broadcasters, and shared with the National Indigenous Australians Agency and other relevant Government agencies as an indicator under Target 17 in the National Agreement on Closing the Gap.

Section 5: Does the licensee have the capacity to continue to provide the service?

9. FNMA encourages the ACMA to request a Strategic Plan under question 10.B and some narrative outlining how the station intends to address any major challenges to achieving its Strategic Plan objectives. We suggest this

approach may be clearer than the draft wording in producing the information the ACMA needs for its license decision-making.

10. FNMA supports the intent of questions 11.D and 11.E as a potential indicator of community engagement and programming transparency. However, the proposed wording does raise some questions on the definition of a program proposal (formal or otherwise) and could subject aspirant presenters to written processes that might otherwise not be a barrier to getting on air. Program proposals are often discussed rather than written, particularly where a licensed service is not presenting live and local content throughout the whole week. This question potentially places a requirement on stations and future presenters that could prevent marginalized groups from accessing the airwaves – the very opposite of its intent. Instead, we suggest asking a question which speaks to the efforts stations are making to encourage new broadcasters to participate, which they also have greater control over.

For example:

11.D How many individuals took part in either formal or mentored training at your station this year?

11.E How many new programs/regular presenters joined the station's program grid in the past year?

Other considerations

FNMA notes the removal of Technical questions (16) from the draft B66 renewal form. Some of these questions may be relevant to the licensee's capacity to deliver a continuous service to its community, such as the question relating to a transmission backup and whether there is a studio located in the license area. FNMA supports the ACMA's intention not to collect information it already has and queries whether this information is already held by the Authority?

As stated above, FNMA does not seek to make the license renewal process more complex than it needs to be for licensees. However, broadcasting license renewals of all media types do provide an opportunity for the ACMA to gather information relevant to the Closing the Gap targets on behalf of Government. FNMA encourages the ACMA to consider how it might contribute information to the Closing the Gap drivers and contextual information under Target 17 currently in data development discussions within the National Indigenous Australians Agency, the Bureau of Statistics and the Productivity Commission.

Next steps

While the proposed changes to the B66 form broadly align with existing processes and procedures for licensees, FNMA will support its members to highlight the importance of ongoing record-keeping on topics relevant to license renewals along with other governance responsibilities.

