



Five-year spectrum outlook 2020-24



The ACMA's spectrum management work
program – consultation draft

Response from First Nations Media
Australia

June 2020

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[First Nations Media Australia](#) (FNMA) is the peak body for the First Nations media and communications industry. The First Nations radio sector comprises 28 urban and regional radio services, 8 remote media organisations servicing 138 remote communities, collectively reaching nearly 50% of the Aboriginal and Torres Strait Islander population each week. In addition, the sector publishes print media including Koori Mail and the National Indigenous Times, online news sites such as IndigenousX, a regional satellite television service reaching 240,000 remote households (ICTV) and a free to air national TV service (NITV). The industry has a strong web presence with First Nations broadcasters active on social media. Plus indigiTUBE, a dedicated online platform showcasing aggregated content complimented by an app, each of which streams 25 radio services. These channels offer a wide range of programming, including news and current affairs reporting from a First Nations perspective, in over 25 languages nationally.

FNMA appreciates the ACMA's commitment to ongoing consultation and the opportunity to provide feedback on the five-year spectrum management workplan for 2020-24. This response provides comments on the sections of the consultation draft that relate to radio and television broadcasting and the impacts of the COVID-19 pandemic on the First Nations media sector.



[Impacts of COVID-19](#)

First Nations media organisations have been impacted by the COVID-19 pandemic in both the short and medium-term. The primary impact of the pandemic has been increasing pressure on the capacity of small teams to deliver essential information services.

Immediate

First Nations media organisations are an essential service for getting information to First Nations communities deemed particularly vulnerable to COVID-19-related deaths. Stations immediately transitioned their operations to facilitate remote broadcasting and increasing hygiene processes for workspaces to protect their teams' health.

At the same time, broadcasters faced a significant increase in workload to effectively respond to rolling announcements and relay information specific to Aboriginal and Torres Strait Islander audiences. This included a significant increase in translation requirements and a fast turn-around on information such as the closure of remote communities which was undertaken with 12 hours notice.

Throughout this period First Nations media organisations once again demonstrated their capacity to deliver timely and relevant information. Communities turned to First Nations media services as trusted sources of information, particularly amid conflicting reports shared through social media and other networks. First Nations media organisations worked to address misinformation within the community, such as connections between 5G and COVID-19.

Medium-term

While the COVID-19 pandemic has been the catalyst for increased collaboration between First Nations media organisations and some community stakeholders (such as Land Councils, Government departments and health organisations), it has also meant the cancellation of broadcast events such as local football broadcasts and NAIDOC week events. Stations have lost income opportunities drawn from fundraising events which they have had to cancel and many have experienced a downturn in sponsorship revenue. These factors place increased strain on untied income and already stretched resources at many First Nations media organisations. First Nations Media Australia notes the ACMA has acknowledged economic pressures relating to commercial broadcasters and adds that while First Nations community broadcasters may be less reliant on self-generated revenue than other broadcast services, many have faced significant dips in self-generated revenue sources (sponsorship, membership, fundraising) needed to supplement Government funding support. Members experienced reductions of up to \$20,000 per month as a result of the COVID-19 pandemic and some estimate they could lose up to \$170,000 in 2020.

Restrictions on in-person interactions also constrain station's capacity to undertake community engagement activities to their fullest extent. Some training activities were able to be moved online, others had to be paused. Activities such as station open days, outside broadcasts and in-studio guests have had to be paused.

Interviews have still been conducted via phone, but the pandemic has resulted in limitations on some community engagement activities.

In terms of governance, stations have been able to conduct Board meetings remotely and some are investigating methods to conduct AGMs online. This is not appropriate for all media organisations (pending access to internet in regions) and some organisations are likely to seek to postpone their 2020 AGMs. It is FNMA's understanding that ORIC is amenable to such requests provided organisations submit an extension request.

[2020-21 Work Program](#)

FNMA is particularly interested in participating in consultation on the development of variations to the Brisbane and Remote Central and Eastern Australia Radio LAP and the potential for re-planning analog radio services in Perth, both of which are scheduled for consultation in Q4 2020.

First Nations Media Australia notes the ACMA has outlined its priorities and resources, listing a range of relevant considerations. We urge the ACMA to add to these priorities consideration of:

- the rationale for the policy objectives relating to the broadcast environment; and
- the needs of communities to access timely, relevant and localised information.

[Broadcasting](#)

FNMA notes the current radio broadcasting planning priorities and raises no objections. We would be interested to learn more about the planned trials of new broadcasting technology described in the consultation draft and would like to have continued involvement in engagements on the future delivery of radio. In addition to the priorities identified, FNMA encourages the ACMA to prioritise the development of application processes for digital-only radio licenses. This has been a request from industry for almost two years to date.

FNMA is interested in participating in consultation processes on the principles to determine whether specified community radio license areas should be deemed to be the same as specified commercial radio license areas to allow access to digital radio. It is our firm view that the same policy objectives that support the provision of

information to communities in a manner that is relevant, timely and accessible apply across any broadcast delivery mechanism. FNMA disagrees with the ACMA's assertion that the establishment of digital radio services should be a commercial decision of the relevant incumbent radio broadcasting licensees. If there is a policy imperative to make an analogue license available to serve local populations, the same rationale should apply to the digital radio space. Community broadcasters cannot financially compete with commercial entities in most markets. Rather, they offer significant public value and provisions should be made for the inclusion of First Nations radio services on digital radio services on that basis, rather than as a commercial decision incumbent on organisations already under financial pressure.

Other considerations

In response to the ACMA's consultation question: Are there other technology developments or sources of spectrum demand that the ACMA should be aware of in considering spectrum management over the next five years?

FNMA encourages the ACMA to consider making available long-term community radio licenses in remote areas where there are currently TCBLs operating over an extended period of time to relieve administrative burden on both the licensee and the ACMA.

FNMA is pleased to note the ACMA's plans for international engagement and thanks the Authority for its oversight of global technology developments in this space.

