



**Urgent request for relief
for Narrowcast Radio Operators
during Covid-19 Crisis**

17 April 2020

Submission to:

Minister for Communications and the Arts
Australian Communications and Media Authority
Department of Health

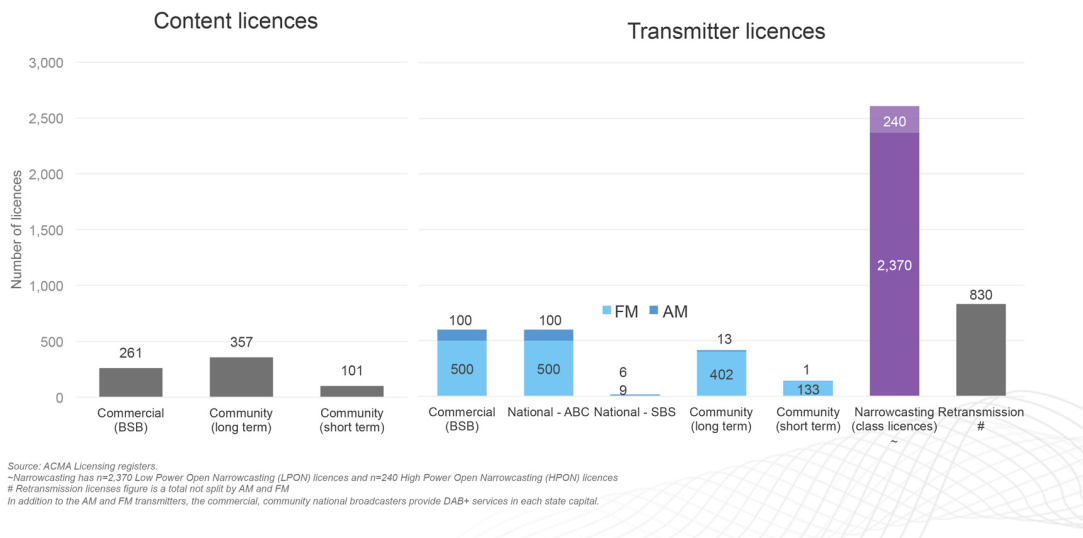
URGENT REQUEST FOR RELIEF FOR NARROWCAST RADIO OPERATORS DURING COVID-19 CRISIS

ANRA is the peak industry body representing Low Power Open Narrowcast (LPON) radio services and the High Power Open Narrowcast (HPON) radio services located across all States and Territories of Australia. Our membership includes major Narrowcast radio program providers such as the TAB, foreign language groups, fringe music services, tourist and religious services, and smaller operators including private individuals.

And, as you can see from the ACMA graph below, **Narrowcasting** enjoys a large representation in Australia's free-to-air radio sector.



Australia has a complex landscape of free-to-air radio networks



ANRA acknowledges that the following requests may require the involvement of a number of regulatory bodies and would appreciate being included in relevant discussions as appropriate.

ANRA accepts and supports that some of our members may also decide to make individual submissions on their own behalf.

Government support for media

ANRA applauds the government for its recent announcement that it will be providing crisis relief to sections of the Australian media, including Commercial television and radio broadcasters who we understand will receive:

- A 100% rebate on their Commercial Broadcasting Tax for 12 months
- Access to a \$50 million Public Interest News Gathering program
- Short-Term Red Tape Relief via suspension of content quotas in 2020

Source: <https://www.communications.gov.au/what-we-do/television/relief-australian-media-during-covid-19>

Narrowcast Radio has been excluded

ANRA wishes to bring to the urgent attention of ACMA and other relevant government agencies and departments the absence of Narrowcast Radio in these crisis relief measures.

Narrowcast Radio forms an essential part of Australia's media landscape and is relied upon by many people for a range of services across the entire country. Many Narrowcast Radio operators have been hit hard by current economic conditions, some reporting very significant drops in income and having to make unplanned outlays to reduce risk to their staff and operations and to remain compliant with the current health directives.

ANRA therefore urgently seeks the government to also extend crisis support to Narrowcast Radio licence holders, as follows:

Fee and Tax Relief

ANRA urgently seeks crisis relief in the form of a 12-month waiver of apparatus fees and spectrum tax in respect of all LPON and HPON licences, in a similar fashion to the relief that has been extended to Commercial Radio and Television licence holders. It should also be taken into account that some operators have recently paid their annual licence fees and taxes.

As well, ANRA supports the request from Commercial Radio Australia that spectrum licence fee relief be considered for a period of at least two years. It is reasonable to expect there will be an extensive re-establishment period following this crisis and radio operators, particularly in regional areas, will be under financial and operational stress adapting to the altered landscape that may ensue.

Red Tape Relief

ANRA also urgently seeks assistance with removing “red tape” in a similar manner as has been offered to Commercial Radio and Television licence holders.

For our sector, the most appropriate course of action would be the rescinding of the “Use It or Lose It” (UIOLI) requirement with respect to LPON licences. This would have an immediate and positive effect, reducing unnecessary overheads for licensees and also the ACMA.

Narrowcasting is the only sector of the radio industry where such a condition applies. ANRA has always opposed the condition and, following a lengthy inquiry, the ACMA itself requested the Minister to revoke the UIOLI direction.

A UIOLI challenge, whether successful or not, involves considerable input from the ACMA to investigate and the licensee to defend, and the financial cost to both parties is substantial. The removal of UIOLI would provide significant savings for both parties and allow each to turn their resources to more productive pursuits, something that is certainly needed in the current situation.

Regional Journalism Participation

We commend the government for its great initiative to make available \$50 million to encourage regional journalism.

However we also note that the Narrowcast Radio sector is currently prevented from contributing to regional journalism, even though it is well placed to make a significant contribution as it encompasses the whole of Australia with over 2600 licences.

ANRA contends that Narrowcast Radio should be enabled by ACMA to contribute to Regional Journalism by approving the inclusion of local news (and weather) as part of any Narrowcast Radio format.

This will in turn enable local journalists, especially in regional areas, to have access to an alternate transmission platform. This would be of great benefit to people living in isolated areas by providing direct access to local news, particularly during a national emergency.

Also, many older citizens are not connected to the internet, so local radio and newspapers are their only source of information on important health and safety issues. (See "[SUNRAYSLIA](#)" article featuring Member for Murray, Helen Dalton).

Electorate Advertising Budget Allocation

We note a request from Commercial Radio Australia for regulatory change to allow members of parliament to use electorate communications allowances on local radio, and for the government to spent at least 15 percent of all advertising dollars on the Commercial Radio sector.

ANRA supports the notion of channelling these funds toward local radio however we wish to point out that commercial radio licensees are not the only local radio outlets for paid advertising campaigns. We believe it would be appropriate that at least 1% of the suggested 15% of electorate communications allowances be channelled to the Narrowcast sector.

COVID-19 Advertising Budget Allocation

We note the Department of Health is spending at least \$32 million on media campaigns in relation to COVID-19.

ANRA is not aware of any Narrowcast Radio service having been included in this media spend, including those in major metropolitan areas with high power coverage. This is likely because these outlets typically do not utilise the same sales agents as Commercial Radio and Television operators and have therefore not even been considered.

ANRA contends that the urgency of the COVID-19 situation should mean that every outlet in Australia should be used for these campaigns – including Narrowcast Radio.

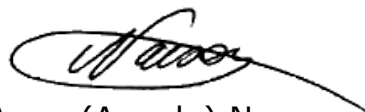
ANRA urgently seeks that this situation be addressed by the relevant government department.

In closing, ANRA appreciates the opportunity to put forward these petitions on behalf of its members. The ANRA Executive look forward to discussing these matters at your earliest convenience.

Regards,



Phil Edwards
President



Ange (Angelo) Nacson
Executive Officer

AUSTRALIAN NARROWCAST RADIO ASSOCIATION