

**SUPPLEMENTARY SUBMISSION TO THE ENVIRONMENT AND COMMUNICATIONS
LEGISLATION COMMITTEE INQUIRY INTO THE MEDIA REFORM BILLS 2013**

19 March 2013

Please find below our response to Senator McKenzie's Questions on Notice.

Is this the comprehensive response to the issues raised in the Finkelstein Report and Convergence Review that you expected?

We support some aspects of the media reform package such as the Television Licence Fees Amendment Bill 2013 and Broadcasting Legislation Amendment (Convergence Review and Other Measures) Bill 2013. We do not believe the 75% audience reach rule should be removed as part of this package. We have concerns about the other bills and consider that the suite of measures and issues needs to be considered.

This package of legislation is not a comprehensive response to the Convergence Review which recommended a raft of reforms to address issues of increasing convergence in media markets. On areas where the government has picked up on issues covered by the Convergence Review, it has not followed the Convergence Review's recommendations. For example, the Convergence Review recommended that most existing media ownership provisions should be removed or amended if a public interest test is introduced.

Many issues touched on by the Convergence Review, including the removal of out-dated and increasingly ineffectual regulation of content, are not addressed at all in this package of bills.

The department told the Joint Select Committee yesterday that it canvassed the Bills with television networks in November 2012. Was that the case then? Is it still the case now?

Network Ten has been talking to the government for a number of years about updating the Australian content rules to reflect the digital television environment and bring commercial broadcasters into line with rules applying to the ABC and SBS.

These discussions only arrived at a level of detail in November prior to the government's announcement of 30 November 2012. We had not seen any further detail beyond the public announcement until last Wednesday night when we saw draft copies of the Television Licence Fees Amendments Bill 2013 and the Broadcasting Legislation Amendment (Convergence Review and Other Measures) Bill 2013.