COMMUNITY BROADCASTING ASSOCIATION OF AUSTRALIA

31 August 2020

Senate Finance and Public Administration References Committee
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LESSONS TO BE LEARNT IN RELATION TO THE AUSTRALIAN BUSHFIRE SEASON 2019-20

QUESTION ON NOTICE - 12 August 2020
FREE-TO-AIR RADIO BROADCAST - TRANSMISSION SITE HARDENING & RESILIENCE

I write further regarding evidence provided by the Community Broadcasting Association of Australia (CBAA) to the public hearing on 12 August 2020 of the Senate Finance and Public Administration References Committee, and its inquiry into lessons to be learnt in relation to the Australian bushfire season 2019-20.

As requested, the CBAA is providing views in regard to the BAI Communications (BAI) submission and proposal to the Royal Commission into National Natural Disaster Arrangements in April 2020, and as also submitted to the Senate Committee in August 2020.

The BAI submission proposes and sets out two recommendations:

(a) BAI recommends further hardening of broadcast sites used for ABC services across Australia.

(b) BAI recommends the establishment of a new 'Universal Mobile Network' covering regional Australia, primarily using existing broadcast transmission sites.

The Senate Committee question was focused specifically on the BAI recommendation relating to further hardening of local radio transmission sites across Australia, and the CBAA comments here are limited to that scope.

Clear public benefit

The CBAA considers there is a clear public benefit and public policy imperative that free-to-air radio broadcast services be resilient and reliable, especially critical in times of emergency or disaster.

The CBAA considers the proposal to harden certain radio broadcast transmission sites has merit, and that public funding is appropriate, with some caveats.

There is a set of questions as to the selection of transmission sites to be targeted, and the priority of the works to be undertaken.

BAI has taken the lead in setting out a dimension of funding, which, on a case-by-case basis seems reasonable, and overall seems proportionate to the scope of work envisaged in its submission.

Ubiquity and trust of radio

As has been canvassed thoroughly in evidence and in the Committee's deliberations, while the public mobile telephone network is a key ingredient, it is not fit-for-purpose nor can it replace free-to-air radio broadcast technology for mass delivery of time and location critical information.

Neither is NBN which, as noted in the BAI submission, is subject to loss of operation when household electric mains power is lost.

Neither does information via NBN or mobile have the trusted relationship or obligations that are seriously, properly and repeatedly observed by radio broadcasters, and that evidence from all three radio sectors – National, Commercial and Community – has made clear.

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Allocation methodology and criteria

The principle of allocating public funding for the purpose of improving the resilience and reliability of free-to-air radio broadcast transmission sites has clear merit.

The methodology for allocation would require further consideration.

It must have regard to radio broadcast planning, the process to extend digital radio currently underway, and involve consultation with radio stakeholders in each area.

Funding might be provided directly to BAI; or to the ABC as the radio broadcaster with the largest obligations in regard to emergency broadcasting; or administered through the Department[1] on a demonstrated needs basis.

In any scenario, the recipient of funding should demonstrate that there is a process to determine priority and scope of sites chosen. To achieve funding support:

- the transmission site must be the main analogue transmission site of the local ABC primary service for emergency broadcasting;
- or, if the transmission site relates to a secondary or overlapping analogue service, then the transmission site must be used or expected to be used as the main or an in-fill site for digital radio purposes.

As transmission site considerations are key to radio planning and radio digitisation, an appropriate aspect of consultation would be the Digital Radio Planning Committee (DRPC). The DRPC is chaired by ACMA[2] - the radio broadcast planning and regulatory authority - and has formal participation of the National, Commercial and Community broadcasters as well as the Department and the ACCC[3].

Background and rationale for criteria

BAI indicated that of around 700 transmission sites it owns and operates, around half already have stand-by power, and the proposal is to improve stand-by power for a further 291 sites, as well as other 'hardening' initiatives for a subset of those sites, and measures to improve service continuity, including satellite feeds.[4]

As far as the CBAA is aware, the majority, if not all, of transmission sites that are the main transmission site of the local ABC primary service for emergency broadcasting would already have stand-by power.

In many locations the primary ABC service for emergency broadcasting would be an analogue MF-AM service.

There are several issues with resting and relying on analogue AM as the bedrock of emergency broadcasting. AM is in decline. AM radios are no longer ubiquitous. Listeners expect better audio quality, and listening to AM radio may not be the preferred or usual listening device.

Where DAB+ digital radio is available, there is strong take-up of listening to the DAB+ digital radio version of content otherwise broadcast via AM, and as AM listening declines.

Meanwhile, areas where DAB+ digital radio is available are extending. Available in all the capital cities, DAB+ is now extending to regional areas. DAB+ has a key efficiency in that coverage can be seamlessly extended from multiple transmission sites, while using the same radio channel. In the greater Sydney area, for example, there are already 7 transmission sites, yet the listener and the radio need not be tuned nor touched.

More in-fill and extension sites are being added, including to tunnels. Relevantly, new tunnels being built provide internal re-transmission of DAB+ digital radio, precisely due to its utility for emergency and safety-of-life situations.

DAB+ is already standard in over 73%[5] of new cars sold in Australia, and increasing. Of note, in August the UK Parliament endorsed statutory instruments implementing European legislation, mandating that all passenger cars sold in the UK be fitted with digital radio (DAB+) as from the end of 2020.[6]

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1 Department (Department of Infrastructure, Transport, Regional Development and Communications)

2 ACMA (Australian Communications and Media Authority)

3 ACCC (Australian Competition and Consumer Commission)

4 The community radio sector has long-term provided content services on the free-to-air satellite platform, VAST. As well as being national coverage and direct-to-home, these services efficiently and reliably distribute content to stations for re-broadcast, and can be deployed for specific, short-term and emergency feeds.

5 Commercial Radio Australia, Glass Information Services Report, December 2019

6 https://getdigitalradio.com/all-new-cars-in-the-uk-to-come-with-digital-radio

These developments in free-to-air radio delivery technology are relevant to policy and strategy in regards to public funding and transmission sites.

As well the main analogue transmission site for the local ABC primary service for emergency broadcasting, the on-going utility of a site for digital radio purposes should be a key criteria in prioritising public funding support for adding or improving stand-by power.

Television sites have relevance

DAB+ digital radio operates on spectrum within the television bands. For that reason, the hardening and location of main and in-fill transmission sites for regional digital radio DAB+ may have synergies with some television sites.

DAB+ and DRM

Alongside DAB+ digital radio, early work is being scoped in relation to Digital Radio Mondiale (DRM) digital radio. DRM can operate in the MF-AM bands and so has potential to create longer term life for some existing AM sites.

However, there is a difficulty of DRM receivers being ubiquitous or freely available and in use on a commodity basis. There is a 10+ year time-lag compared to DAB+ in Australia, especially relevant to cars. Meanwhile, DAB+ is the digital radio solution, with the key being to sculpt and extend coverage using a main and set of in-fill transmission sites, not just the one main site.

Site and tower access

As there is a need for access to multiple transmission sites to ensure radio coverage, especially for digital radio, it is important that, where practical, access be as of right, and kept affordable for licensed free-to-air radio broadcasters.

It would be useful for the Committee to recommend that the Department explore amending existing legislation relating to rights of access to transmission sites and towers for digital radio.

Current legislation is limited and relates only to broadcast transmission sites.

As a matter of public policy principle, for digital radio broadcasting coverage to efficiently extend, there should also be a right of affordable access to use of mobile telecommunications transmission sites for licensed free-to-air digital radio purposes.

This seems especially reasonable where those mobile telecommunications sites have been established or enhanced with support courtesy of numerous Federal Government funding schemes.

Certainty of funding

In evidence by the CBAA at the public hearing I mentioned that, as well as a once-off boost related to COVID-19, the CBAA is seeking certainty of on-going funding. There are funding streams that end on 30 June 2021, and early notice of renewal is critical, and especially important for digital radio.

Reiterating the criticality of that specific point, the CBAA has provided the Department with updates and background, and stated:

The CBAA is seeking an immediate commitment in the October budget to maintain existing levels of Federal Government funding that is targeted for community digital radio on an on-going basis, indexed and capped at or near $4.5 million per annum, so that there is no disruption to services in 2021, or immediate planning instability.

I trust this extra information is useful and assists the Committee's considerations.

Yours sincerely

Jon Bisset
Chief Executive Officer