

An updated public submission (17/3/2017 version), regarding the 'Australian Broadcasting Corporation Amendment (Restoring Shortwave Radio) Bill 2017' submitted to the committee to replace previous submissions.

A High Frequency (HF), Amplitude Modulation (AM) broadcasting service is the only type of radio technology capable of being received by the general public in remote areas of Australia and Territories. Other communication technologies require reception equipment that is not generally available to all Australian citizens due to cost or their complex technical requirements.

The withdrawal of a remote area, HF, radio broadcasting services should have equal weight to the withdrawal or downgrading of rural, Medium Frequency (MF), AM, radio broadcasting services in States such as Victoria. Withdrawal of ABC radio services from rural areas of Victoria would not be acceptable. Therefore, this Amendment Bill should ensure people in remote areas of Australia and the Territories do not have their services withdrawn or downgraded because of their location outside urban centres of population.

A Very High Frequency (VHF), Frequency Modulation (FM) radio broadcasting service should be acknowledged as a type of radio technology capable of being received by the general public using reception equipment generally available to all Australian citizens due to cost. A VHF FM transmitter is limited to reception by line of sight from the transmitter antenna this a relatively short range service limited the immediate area. Even from mountain top locations this technology is unable to service the remote areas of Australia and Territories.

The substitution of a short range, VHF FM radio service is not an acceptable solution for all the remote areas of Australia and Territories that relied on the Radio Australia's HF service. VHF services are appropriate for limited areas like towns and surrounds, small islands. etc. For larger areas (e.g. whole of Tasmania) the extensive ABC VHF FM transmitters can not service 100% of this island state. While a HF transmitter can broadcast to entire regions of the globe or blanket the whole of Western Australia. Therefore the Amendment Bill should specify the type and grade of service the ABC is required to provide.

All Australian Territories should be recognised as areas to be serviced by the ABC, not just the Northern Territory (NT). The existing Act and relevant Charters do not provide for different levels of service between internal (e.g. NT) and external Territories such as:

- Ashmore and Cartier Islands.
- Australian Antarctic Territory.
- Christmas Island.
- Cocos (Keeling) Islands.
- Coral Sea Islands.
- Heard and McDonald Islands.
- Norfolk Island.

Only a HF AM service is capable of reaching all these locations and Section 27A(1) of the Amendment Bill should encompass all Territories plus Western Australia and should not be restricted to the NT.

In the Act there is a requirement for the ABC to broadcast to Australian Citizens and there is no limitation on their global location. With the closure of Radio Australia the ABC can no longer comply with any requests to broadcast to all global areas due to the lack of HF AM transmitters. In an emergency due to conflict, civil unrest, state of emergency, or natural disaster the failure to broadcast to Australian Citizens may result in harm to those Australian Citizens. This requirement means Section 27A should be amended to ensure the service is capable of broadcasting to all regions of the globe. At a minimum this should include services in languages other than English.

Therefore the list of example countries should include China, Vietnam, India, Indonesia and also regions like the Middle East, Africa, South America, etc. The requirement would not be to provide simultaneous broadcasts to all countries and regions. It is to have the capability to broadcast to these areas and be selective in the program schedule. The location, power and antennas of the HF transmitters also needs minimum standards otherwise programs may not provide a reliable service to target audiences. The Australian Government needs to maintain the capability to project a positive image and select target audiences for this service.

The HF transmitting stations have always been operated by entities external to the ABC and they could be directly funded from Australian Government budgets. For example funding for a new HF service could be provided through Foreign Affairs budgets. If required the Amendment Bill could be amended to directly fund the HF transmitters and accept program material from alternative sources to the ABC. Another public broadcasting station equivalent to the USA Public Broadcasting Service (PBS) or Voice of America could be established to provide program material to the transmitters without funding by the ABC.

Alternatively, entertainment material could be sourced from broadcasting stations like PBS-FM for minimal cost. The committee should consider if it would be much more effective and efficient to establish a new entity than force the ABC to produce programs. The history and limited resourcing of the ABC's radio station 3ZZ clearly shows what can happen under ABC management. Note 3ZZ was killed off by the ABC in the 1970s.

Then a major problem is sourcing unbiased, independent news, public affairs and political broadcast material. Worst case could be a rebroadcast of ABC material taken off-air using receivers in appropriate locations. This would provide program material for a HF service at zero cost from the ABC.

Radio Australia could be re-established within the ABC but this is not a preferred option as forcing the ABC may be counter-productive. Given the ABC is unable to fund Radio Australia a new entity called Voice of Australia (VoA) or similar could be established to replace Radio Australia.

These were just a few ideas for consideration on this subject. If I had more time I would hope to provide a more complete and polished submission. I support the Amendment Bill and accept it provides the absolute bare minimum for a broadcasting service.

Published in the Commonwealth Gazette is my eligibility for promotion or transfer as a Radio Technical Officer. In the past I was a Broadcast Technical Officer/Broadcast Engineering Officer employed by the ABC performing studio maintenance for Radio Australia, 3ZZ, and local radio in Victoria. I must admit this could all be considered ancient history as I am now retired.