

9 March 2011

Senate Environment and Communications  
Legislation Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

To whom it may concern

**Broadcasting Legislation Amendment (Digital Dividend and Other Measures) Bill 2011**

Free TV Australia represents all of Australia's commercial free-to-air television broadcasters. In 2011 commercial free-to-air television is the most popular source of entertainment and information for Australians, with our members providing nine channels of content across a broad range of genres, as well as rich online and mobile offerings, all at no cost to the public.

Free TV welcomes the opportunity to comment on the Broadcasting Legislation Amendment (Digital Dividend and Other Measures) Bill 2011 (the Bill).

Free TV strongly supports the Bill and believes it is essential to efficiently facilitate the transition to digital television and the digital dividend this will allow.

With two successful analogue switchoff processes already undertaken – in Mildura in June 2010 and regional South Australia in December 2010 – the digital transition has commenced well. However, the ongoing switchoff schedule is extremely tight, with the largest analogue switchoff so far scheduled to take place in regional Victoria in May followed by the extremely difficult regional Queensland in the second half of this year.

Due to the technical, policy and cost challenges presented by this tight schedule, Free TV holds that the rapid passage of the Digital Dividend Bill is essential.

In particular, Free TV supports the following elements of the Bill:

- The streamlining of processes surrounding digital planning. 'Television Licence Area Plans' will be more flexible and responsive to the needs of broadcasters and consumers and will allow for digital-to-digital simulcasts. We believe this more flexible process is vital to enable switchoff to occur in the scheduled timeframe.

- The provision in Schedule 2, Item 5 which permits remote area licensees to broadcast only standard definition signals during the simulcast periods. This is an important provision, which will significantly reduce the technical and cost burden of conversion for broadcasters in thinly populated areas. This is essential to ensure regional Australians are able to receive the same free channels as their metropolitan peers.
- The introduction of Category D reception areas in Western Australian with respect to viewers who will, after the end of the simulcast period, receive adequate reception of all the applicable terrestrial digital commercial television broadcasting services.

Finally, Free TV is cognisant of the particular burden the switchoff process places upon regional broadcasters. With this in mind, Free TV endorses the Regional Broadcasting Australia submission and supports its comments on specific matters in the Bill.

Thank you again for the opportunity to comment on the Bill. Please contact me if you would like further input or require clarification.

Yours sincerely ,

 **Julie Flynn**  
**CEO**