



**Submission by
Free TV Australia**

Senate Select Committee into the Abbott
Government's Budget Cuts

*Special Inquiry into the ABC and SBS
Budget cuts*

8 December 2014



Contents

| | |
|--|---|
| Executive Summary | 2 |
| Introduction | 3 |
| Proposal for SBS advertising changes | 3 |
| Lack of Proper Consultation with affected stakeholders | 4 |
| Finite nature of the television advertising pie | 4 |
| Government figures underestimate the impact on commercial broadcasters | 5 |
| 1. Government estimates of the financial benefit to SBS | 5 |
| 2. Independent analysis | 7 |
| Impacts on Free TV Broadcasters | 8 |
| 1. Detrimental impact on quality of content | 8 |
| 2. Impact akin to introduction of fourth commercial network | 9 |

Executive Summary

- Free TV Australia is strongly opposed to any moves to allow the SBS to increase its hourly advertising time limits.
- Despite the fact that the decision will have a material impact on the Australian television advertising market, there has been no consultation with affected parties at any stage throughout the process.
- Further, the lack of transparency has been compounded by the failure to publish any of the reasoning upon which this decision has been made.
- The television advertising market is finite and any new revenues derived by the SBS must therefore come at the expense of existing players. In a fragmenting advertising market there is no 'magic pudding'.
- The Government's figures significantly underestimate the impact of the proposed changes on the advertising market. The government itself has admitted that it has chosen a lower figure based on advice from the SBS rather than the higher number suggested by its own efficiency report. These figures range from \$28.5 million to \$100 million over 5 years.
- Independent modelling commissioned by Free TV has found that the likely impact on the Australian television advertising market is around \$192.5 million.
- The Government has claimed the impact on existing players will be minimal as there will be no overall increase in advertising time on SBS. However, around 80% of television advertising revenue is earned in prime time. Allowing SBS to double its hourly advertising limit will simply see more inventory available in prime time and this will have a significant impact on the overall advertising market.
- As a matter of principle, a government-funded broadcaster should not be subsidised at the expense of privately-funded businesses. These businesses already pay extremely high licence fees on top of their Australian corporate taxes as well as being subject to expensive Australian content obligations, not faced by the SBS.
- The proposal to increase prime time advertising on the SBS will have a direct and detrimental impact on commercial broadcasters' revenue, and will have a direct impact on Free TV broadcasters' ability to continue to fund expensive Australian and local content.
- Any revenue transfer to the SBS is unlikely to be invested in Australian content and will therefore have a detrimental impact on the overall television production sector.



Introduction

Free TV Australia welcomes the opportunity to provide a submission to the Senate Select Committee into the Abbott Government's Budget Cuts, and its special inquiry into the measures proposed regarding the ABC and the SBS.

Free TV represents all of Australia's commercial free-to-air television broadcasters, Channel Seven, Channel Nine, Channel 10, WIN, Prime, Southern Cross and Imparja. At no cost to the public, our members provide fifteen channels of content across a broad range of genres, as well as rich online and mobile offerings. The value of commercial free-to-air television to the Australian public remains high. On any given day, commercial free-to-air television is watched by more than 13.5 million Australians.

Commercial free-to-air broadcasters are the major investors in Australian content spending a record \$1.54 billion in 2013/14 and employing over fifteen thousand Australians, directly and indirectly.

Free TV Australia is strongly opposed to any moves that effectively allow the SBS to increase its advertising during prime time. The SBS already receives hundreds of millions of dollars in funding from taxpayers. This should not be supplemented by additional advertising revenue from an already fragmenting advertising market.

There has been no proper consideration of the impact of the decision on commercial free-to-air broadcasters. No consultation process has been undertaken with affected parties. Furthermore, no published financial modelling is available to indicate any basis for the decision.

The commercial free-to-air television industry is responding to challenging and uncertain market conditions by investing in new, innovative platforms and services. Channels Seven, Nine and Ten all have catch-up services: PLUS7, 9jumpin and TENplay. FreeTV broadcasters have invested heavily in the development of FreeView Plus.

In this context, additional competition for fragmenting advertising revenues will have an unacceptable commercial impact on Free TV members.

Proposal for SBS advertising changes

The SBS is a government funded broadcaster which also derives income from advertising. Under current rules the SBS is limited to 120 minutes of advertising a day and has a strict limit of 5 minutes of advertising in any one hour.

As part of the package of reforms announced by the government on 19 November 2014, the Minister for Communications, Malcolm Turnbull, announced that the government would introduce legislation to:

*“allow for a more flexible approach allowing the network to average the five minutes per hour across the day, but no more than 10 minutes in any hour”.*¹

¹ The Hon Malcolm Turnbull MP, The future of Our Public Broadcasters, 19 November 2014.



The most likely effect of these changes is that the SBS will double its advertising time in prime time from five to ten minutes per hour.

Prime time (from 6.00pm till midnight) is the key revenue driver for all broadcasters. Up to 80% of revenue is earned in prime time. Prime time is heavily contested by broadcasters for both audiences and the revenue they drive.

Lack of Proper Consultation with affected stakeholders

Despite the fact that changes to the SBS advertising rules will clearly impact commercial and pay television broadcasters, there has been no consultation with Free TV members on the likely impact on the advertising market at any time throughout this process.

No information has been provided in relation to the basis of the decision or how the numbers that sit behind this decision have been derived. As a result there is no way to interrogate the data or to understand the assumptions that sit behind them.

Free TV broadcasters already pay a licence fee of 4.5% of gross revenues on top of normal corporate taxes and are subject to a significant additional regulations, such as Australian content quotas, that do not apply to the SBS. In these circumstances, where the government is proposing to increase the amount of revenue that the SBS can derive from the television advertising market, fairness indicates that the affected parties are consulted and that any assumptions underlying the proposed changes are transparent.

Finite nature of the television advertising pie

The Australian advertising market is fragmenting, placing television advertising revenues under significant pressure.

Based on experience from the introduction of multi-channelling, an increase in television advertising inventory does not result in an increase in overall TV advertising revenue. In this finite and challenged market, allowing the SBS to increase its prime time advertising inventory would not grow the market - it would trigger a shift in advertising spend from the commercial networks to the SBS.

The SBS competes with commercial broadcasters for the same advertisers and audiences. A list of advertisers on the SBS (sourced from the SBS 2014 Annual Report) compared with the Nielson Adex data demonstrates that 85% of advertisers on the SBS also advertise on commercial free-to-air television (see Appendix 1).

The profile of the SBS viewing audience is not significantly different to that of the commercial free-to air TV audience, particularly when looking at the lucrative 25-54 year old demographic which is the key buying audience for advertisers. For FY13-14, 25-54's accounted for 46.8% of the commercial free-to-air audience and 41.1% of



the SBS audience. During the World Cup Soccer event specifically, 25-54's made up 48.8% of the SBS's audience.²

Any increase in advertising inventory in prime time will also impact the overall market by driving down prices as advertisers use increased supply to drive down the cost of advertising spots.

This move is particularly disruptive in a market where revenues and revenue share remain under pressure.

The latest PricewaterhouseCoopers analysis from the report *Australian Entertainment and Media Outlook 2014-2018* demonstrates that growth in free-to-air television advertising revenues has remained flat since 2008, and has a Compound Annual Growth Rate (CAGR) forecast of just 1.4% over the next five years. This is well below CPI. In 2014, the online advertising share exceeded television advertising for the first time, and has a CAGR forecast of 9.1% over the next five years.³

In this environment, it is grossly misleading to suggest that either the television advertising "pie" will grow, or that the additional advertising revenue written by SBS will come from a different market segment than the one existing broadcasters compete for. Allowing the SBS to increase the amount of advertising sold in prime time can only lead to existing players receiving less of a finite revenue pool.

Further eroding the revenue of Free TV broadcasters will compromise our ability to continue investing in high quality Australian content such as news, current affairs, drama, regional content and sport. It will also amount to yet another tax on commercial broadcasters' revenue.

Government figures underestimate the impact on commercial broadcasters

1. Government estimates of the financial benefit to SBS

The clear implication of the Minister's announcement is that there will be minimal impact on the advertising market overall because the total number of advertising minutes on the SBS through the course of a day will not change, and that the limit of 120 minutes for the SBS is well below the 350 minutes allowed under the Commercial Television Industry Code of Practice.

This assertion was repeated by a representative of the Department of Communications speaking at Senate Estimates on 25 November 2014.⁴

This argument fails to understand the operations of the television advertising market and is misleading.

² Source: OzTAM, 5 cap cities, people 25-54, FY 13-14 (01/07/13 – 30/06/14), 2014 World Cup Soccer (12/06/14 – 13/07/14), all day 2am-2am profile, based on consolidated data.

⁴ Evidence to Estimates (Environment and Communications Legislation Committee), Parliament of Australia, Canberra, 25 November 2014, 12, Ms Nerida O'Loughlin.

Up to 80% of all advertising revenue is earned in prime time. Currently the SBS is limited to 5 minutes of advertising in prime time. Under this proposal they will be able to have 10 minutes of advertising in prime time, double their current advertising inventory, so long as the overall limit of 120 minutes remains the same. The effect of this will be to bring the SBS much closer to the 13 minutes per hour allowed in prime time under the Commercial Television Industry Code of Practice.

The definition of 'advertising' in the *Special Broadcasting Services Act 1991* (Cth) does not include promos or station IDs.⁵ This is in contrast to the Commercial Television Industry Code which captures both in the definition of non-program matter.⁶

When this additional material is taken into account, the actual amount of advertising minutes on the SBS under this proposal will closely resemble the amount of advertising on commercial television.

Any analysis of the proposal must take into account the impact on prime time revenues if it is to provide an accurate picture of the likely impact on the television advertising market.

The Government's own figures on the size of the potential revenue available to the SBS are contradictory. The formal documentation states that the amount to be raised is \$28.5 million over 5 years. This figure was confirmed on 20 November 2014 by Mr Peter Khalil, Director of Corporate Affairs at the SBS, who told the Senate Environment and Communications Committee Estimates Hearing that:

*There are increased advertising revenue efficiencies, which total about \$28.5 (million) in that estimation I was talking about.*⁷

On Tuesday 25 November, Ms Nerida O'Loughlin, Deputy Secretary of the Department of Communications, told the Senate Environment and Communications Committee Estimates Hearing that:

*Under SBS you will see the savings – the advertising revenue. It is \$4.1 million in 2015-16, rising to about \$8.7 million in 2018-19. The total over 5 years is \$28 million.*⁸

In his speech on 19 November, the Minister cited SBS projected ad revenue figures of \$8 – \$9 million per annum. He noted however, that the figures are in dispute, and said that the Lewis efficiency review had suggested that the SBS could raise up to

⁵ Section 45(3), *Special Broadcasting Services Act 1991*.

⁶ See Clauses 5.4 – 5.5. Under clause 5.5.8.5 of the Commercial Television Industry Code of Practice, station identifications are included unless they do not contain any references to the day and/or time of broadcast of any program or programs.

⁷ Evidence to Estimates (Environment and Communications Legislation Committee), Parliament of Australia, Canberra, 20 November 2014, 92, Mr Peter Khalil.

⁸ Evidence to Estimates (Environment and Communications Legislation Committee), Parliament of Australia, Canberra, 25 November 2014, 11, Ms Nerida O'Loughlin.

\$20 million per annum.⁹ The Lewis Report itself noted that these figures were conservative.¹⁰

The disparity between the figures used by the Government in discussing these changes raises serious questions about the adequacy of the modelling on which they are based, and highlights the lack of transparency and consultation regarding the true financial impact of the proposed changes.

The basis on which the government has accepted the SBS revenue calculations has not been made public and the modelling behind the Lewis Report figures has been redacted.

This makes it impossible to interrogate the assumptions on which these figures have been accepted. It is also not clear why the government has accepted the SBS modelling over that of the Lewis Report.

2. Independent analysis

As no data has been provided by the government to explain its published revenue projections, Free TV has commissioned independent analysis to model a likely outcome based on available industry data.

Independent modelling conducted by Anomaly, a specialist industry market research and intelligence company, indicates that the SBS could earn an additional \$192.5 million over the next five years under the proposed changes.¹¹

The Anomaly model has been based on;

- SMI data - a proprietary industry standard measurement, that captures advertising revenue sourced from major advertising agencies.
- Expected industry growth of 1.4% over the next five years in line with the PwC *Australian Entertainment and Media Outlook 2014-2018* Compound Annual Growth Rate (CAGR) forecast.
- A fill rate 70%, and
- an estimated peak revenue of 80% of total revenue earned.

These calculations suggest that the government's projections have significantly undervalued the impact of these changes on the advertising market.

Selling air-time is a highly specialised business, but the basic parameters are well known and understood. Free TV is confident that these figures represent a fair projection of the possible revenue that the SBS can derive from the proposed changes.

Free TV would welcome an opportunity to appear before the Committee to explain the projections and the assumptions on which they are based.

The Government figures do not detail the impact of the changes on regional broadcasters, including Imparja (which will be affected significantly if there is an increase in the amount of advertising permitted on NITV). In particular, an erosion of

⁹ The Hon Malcolm Turnbull MP, *The future of Our Public Broadcasters*, 19 November 2014.

¹⁰ Peter Lewis, *ABC and SBS Efficiency Study (Lewis Report)*, April 2014 at 84.

¹¹ Material sourced and analysis provided by Anomaly, an IPG Mediabrands owned company.

advertising revenues in regional areas will impact on broadcasters' continued ability to provide local news and information services. These significant and important impacts are not explored in either the Minister's speech, or the Lewis efficiency review.

As a matter of principle, any proposal that deliberately seeks to extract vital revenues from the television advertising market to make up for cuts in government funding is an unacceptable impost on private business. It amounts to a further tax on Australian businesses that are already disproportionately taxed and regulated.

Impacts on Free TV Broadcasters

There are many flow-on impacts on commercial broadcasters of the decision to provide the SBS with the flexibility to increase their prime time advertising, beyond the direct impact on commercial free-to-air revenues.

1. Detrimental impact on quality of content

Most importantly it could undermine the major contribution that Free TV broadcasters make to the production of expensive Australian content across a range of genres including, news, sport, drama and children's programs.

Commercial free-to-air broadcasters are subject to extensive obligations to produce Australian content, including specific requirements for first release Australian drama, documentary and children's programs. This is in addition to the 55% transmission quota for Australian content, which applies to Free TV members' primary channels.

Regional commercial television broadcasters also face an additional financial impost as a result of the licence condition that requires the delivery of local content to regional areas in parts of Australia.

The cost of meeting these obligations has increased substantially, with broadcasters now devoting approximately 79% of their total programming expenditure to Australian content.

Each year Screen Australia reports that commercial broadcasters are the leading underwriters of Australian drama, contributing more than any other source to the TV drama slate.¹²

The SBS does not have any comparable obligations, despite government funding of over \$267 million in 2013/14.¹³ At a Senate Estimates hearing in November 2013, Mr Ebeid noted that only about 10% of the SBS schedule was local Australian content, and in the preceding year they had produced just 4 hours of commissioned Australian drama.¹⁴

¹² See, for example, Screen Australia Drama Report – Production of feature films and TV drama in Australia 2013/4 at page 14

¹³ SBS, Annual Report 2014 at 70.

¹⁴ Evidence to Estimates (Environment and Communications Legislation Committee), Parliament of Australia, Canberra, 19 November 2013, 11, Mr Michael Ebeid.



Based on these figures there is no evidence that revenue gained by the SBS at the expense of commercial broadcasters will be invested in Australian content.

Given that most commercial broadcasters' international contracts are for fixed periods, it is likely that any loss of revenue as a result of the proposed changes will however impact on commercial broadcasters' ability to continue to fund Australian content at record levels, and this will have flow on effects to the independent production sector which relies heavily on the investment from the commercial free-to-air television sector.

2. Impact akin to introduction of fourth commercial network

Last year there was bi-partisan support for changes to the *Broadcasting Services Act 1992* to prevent the allocation of a fourth commercial television broadcasting licence. Our members are deeply concerned that the proposal to increase prime time advertising on the SBS will have a direct and detrimental impact on their revenue, and equates to the introduction of a fourth commercial television broadcasting network by stealth.

The SBS plays an important role in the community, but it is already government-funded. Furthermore, the hybrid model, which allows the SBS to derive advertising and sponsorship revenue, was never intended to place them on an equal footing with commercial television broadcasters. This principle should not be modified further.

Given the lack of consultation and transparency around the proposal to provide the SBS with flexibility to increase the number of advertising minutes in prime time and the highly contested nature of the government's revenue projections, Free TV respectfully asks that the Committee recommend against this proposal proceeding.

Appendix 1

SBS ADVERTISERS THAT ALSO ADVERTISE ON FREE TV

A list of SBS advertisers (sourced from the SBS 2014 Annual Report) has been compared with Nielsen Adex data to determine which clients are common to both SBS and commercial free-to-air television. The vast majority (85%) of the SBS advertisers also advertise on Free TV.

| SBS Advertiser | Free TV Advertiser |
|----------------------------------|--------------------|
| 20th Century Fox | ✓ |
| 99bikes | ✓ |
| AAMI | ✓ |
| AB Foods | ✓ |
| Actron Air | ✓ |
| Adelaide Central Market | ✓ |
| Adelaide Fringe Festival | ✓ |
| Adidas | ✓ |
| Advanced Hair Studio | ✓ |
| Age, The | ✓ |
| AKA | ✓ |
| Alby Turner & Son Kitchens | ✓ |
| ALDI | ✓ |
| Alinta Energy | ✓ |
| Alzheimer's Australia | ✓ |
| Amber Tiles | ✓ |
| Ambition Entertainment | ✓ |
| American Express | ✓ |
| AMP | ✓ |
| Ancestry.com | ✓ |
| Andrew Jones Travel | ✓ |
| Animals Australia | ✓ |
| ANZ Bank | ✓ |
| APG | ✓ |
| Apple/Apple Computer | ✓ |
| APT Touring | ✓ |
| ArborCrest | ✓ |
| Arla Foods | ✓ |
| Arnotts | ✓ |
| Arrow Energy | ✓ |
| Art Gallery of Western Australia | ✓ |
| Ashley & Martin | ✓ |
| Asia Travel Communications | ✗ |
| Asics | ✓ |
| ASPIA | ✓ |
| AstraZeneca | ✓ |

| SBS Advertiser | Free TV Advertiser |
|---|--------------------|
| ATA | ✓ |
| Audi | ✓ |
| Aurora Energy | ✓ |
| Austral Piano World | ✗ |
| Australian Cancer Research Foundation | ✗ |
| Australian Football League | ✓ |
| Australian Greens, The | ✓ |
| Australian Health Management | ✓ |
| Australian Labor Party | ✓ |
| Australian Meat & Livestock Corporation | ✓ |
| Australian Pensioners Insurance | ✓ |
| Australian Philharmonic Orchestra | ✗ |
| Australian Piano Fair | ✓ |
| Australian Scholarship Group | ✗ |
| Australian Solar Council | ✗ |
| Aztec International Entertainment | ✓ |
| Babylove | ✓ |
| Bamboozle | ✓ |
| Bank of Queensland | ✓ |
| Bankmecu | ✓ |
| Barry Paterson Media | ✓ |
| Bayer Australia | ✓ |
| Beaumont Tiles (Adelaide) | ✓ |
| Beaumont Tiles (Brisbane) | ✓ |
| Beaumont Tiles (Melbourne) | ✓ |
| Beaumont Tiles (NSW) | ✓ |
| Beaumont Tiles (QLD) | ✓ |
| Beaumont Tiles (SA) | ✓ |
| Beaumont Tiles (Sydney) | ✓ |
| Beaumont Tiles (Tasmania) | ✓ |
| Beaumont Tiles (VIC) | ✓ |
| Belgamba Eco Tourism Retreat | ✗ |
| Bellissimo Services | ✗ |
| Bendigo Bank | ✓ |
| Bet365 | ✓ |
| Betfair | ✓ |

| SBS Advertiser | Free TV Advertiser |
|--|--------------------|
| Bevilles Jewellers | ✓ |
| Beyond Blue | ✓ |
| Bicycle Express | x |
| Bike Exchange | ✓ |
| Bing Lee | ✓ |
| Bingle | ✓ |
| Birch Carroll and Coyle Limited | ✓ |
| Bishops Solicitors | ✓ |
| Black Knight Erotica | ✓ |
| Blue Star Electric | x |
| Bluesfest Touring | ✓ |
| BMW Australia | ✓ |
| Bob Brown Foundation, The | x |
| Bob Jane | ✓ |
| Boehringer | ✓ |
| Bond University | ✓ |
| Borg Brothers Funerals | x |
| Boystown | ✓ |
| Breville | ✓ |
| Britz N Pieces | ✓ |
| Broadway Homes | ✓ |
| Brookland Valley | ✓ |
| Brown Forman | ✓ |
| Brutale Restaurant | x |
| BT Financial | ✓ |
| Buderim Ginger Retail | ✓ |
| Budget Direct | ✓ |
| Bulla | ✓ |
| Bunnings Warehouse | ✓ |
| Bupa Australia Health | ✓ |
| Calypso Mangoes | ✓ |
| Camera House | ✓ |
| Cancer Council WA | ✓ |
| Cappo Seafood | ✓ |
| Capricorn Motors | x |
| Captain Choice Tours | ✓ |
| Caravan & Camping Industries Association of SA | ✓ |
| Caravan Trade Industry Association Victoria | ✓ |
| Care Super | ✓ |
| Carlton United Breweries | ✓ |
| Carpet Choice | ✓ |
| Cartell Music | x |
| CauseForce (Agency) | ✓ |

| SBS Advertiser | Free TV Advertiser |
|---|--------------------|
| CGU | ✓ |
| Chemist Warehouse | ✓ |
| Chevron | ✓ |
| Chisholm Institute of TAFE | ✓ |
| Choosi | ✓ |
| Chris O'Brien Lifehouse | ✓ |
| Christadelphian Gospel Proclamation Association | ✓ |
| Chrysler | ✓ |
| Chugg Entertainment | ✓ |
| Citibank | ✓ |
| Citroen | ✓ |
| City Perth Legal | ✓ |
| Clarke Security | ✓ |
| Clive Palmer United Australia Party | ✓ |
| Clubs NSW | ✓ |
| CMI | ✓ |
| Coles Express | ✓ |
| Coles Financial Services | ✓ |
| Coles Gift Cards | ✓ |
| Coles Insurance | ✓ |
| Coles Orion | ✓ |
| Coles Supermarkets | ✓ |
| Collins Food Group | ✓ |
| Colonial First State | ✓ |
| Commonwealth Bank | ✓ |
| Conci Furniture | ✓ |
| Continnence Foundation of Australia | ✓ |
| CPA Australia | ✓ |
| Crazy Domains | ✓ |
| Crown | ✓ |
| Crown Perth | ✓ |
| CUA | ✓ |
| Curtin University | ✓ |
| Customer Owned Banking Association | ✓ |
| Dainty Consolidated Entertainment | ✓ |
| Dave Potter Honda | ✓ |
| Dealmax | ✓ |
| Defence Bank | x |
| Delphi Bank | ✓ |
| Demir Leather | ✓ |
| Destination NSW | ✓ |
| Diageo | ✓ |
| District Aborigines Co-Op | x |

| SBS Advertiser | Free TV Advertiser |
|---|--------------------|
| Diversified Exhibitions | ✓ |
| Dr Oetker | ✓ |
| Dreamland | ✓ |
| Duo Glass | ✓ |
| Dyson Appliances | ✓ |
| Ebay | ✓ |
| Eftpos | ✓ |
| eHarmony | ✓ |
| Ekornes | x |
| Elite Appliances | ✓ |
| Eltham Valley Pantry | x |
| Empire Touring | x |
| Energex | ✓ |
| English For Work | ✓ |
| Enjo | ✓ |
| Ergon Energy | ✓ |
| Essential Ingredient | x |
| Etihad Airways | ✓ |
| Ettason | x |
| Euro Solar | ✓ |
| Eventscorp | ✓ |
| Evergreen Cactus Australia | x |
| Expedia | ✓ |
| Express Solar | ✓ |
| Ezyline Events | x |
| Falun Dafa Association of Australia (Vic) Inc | x |
| Falun Dafa Association of NSW Inc | x |
| Falun Dafa Association of QLD Inc | x |
| Falun Dafa Association of VIC Inc | x |
| Fantastic Furniture | ✓ |
| Fasham Johnson | x |
| Federal – Australia Post | ✓ |
| Federal – Australian Electoral Commission | ✓ |
| Federal – Australian Taxation Office | ✓ |
| Federal – DBCDE | ✓ |
| Federal – DEEWR | ✓ |
| Federal – Department of Communications | ✓ |
| Federal – Dept of Defence | ✓ |
| Federal – Dept of Foreign Affairs & Trade | ✓ |
| Federal – Dept of Health & Aged Care | ✓ |
| Federal – Dept of Immigration & Citizenship | ✓ |
| Federal – Dept of Justice & Attorney General | ✓ |

| SBS Advertiser | Free TV Advertiser |
|---|--------------------|
| Federal – DIICSRTE | ✓ |
| Federal – FaHCSIA | ✓ |
| Federal – National Preventative Health Agency | ✓ |
| First National Real Estate Borg & Associates | ✓ |
| FKP Properties | ✓ |
| Flight Centre | ✓ |
| Flutes | x |
| Fonterra | ✓ |
| Ford | ✓ |
| Ford Dealers | ✓ |
| Forest & Wood Products Australia | x |
| Foxtel | ✓ |
| Fred Hollows Foundation | ✓ |
| Fridge & Washer City | x |
| Friedman Lurie Singh & D'Angelo | ✓ |
| Frontier Touring Company, The | ✓ |
| Garvan Institute | ✓ |
| Gavin Ross & Co | ✓ |
| GE | ✓ |
| General Mills | ✓ |
| General Store | ✓ |
| Get Up | ✓ |
| Gift Abroad QLD | x |
| GlaxoSmithKline | ✓ |
| GMF Health | ✓ |
| Gold Coast International Marine Health Expo | x |
| Golden Casket | ✓ |
| Goldfields Cyclclassic | x |
| Good Guys, The | ✓ |
| Google | ✓ |
| Gourmet Gardens | ✓ |
| Grant Burge | x |
| Gravia Media | x |
| GraysOnline | ✓ |
| Great Southern Railway | ✓ |
| Greater Building Society | x |
| Greenpeace | x |
| Greens WA, The | ✓ |
| Griffith University | ✓ |
| H&R Block | ✓ |
| Harris Scarfe | ✓ |
| Harvey Norman | ✓ |
| HBF | ✓ |

| SBS Advertiser | Free TV Advertiser |
|--------------------------------------|--------------------|
| Health World Ltd | ✓ |
| Heart Foundation WA | ✓ |
| Helen Wong's Tours | ✗ |
| Heritage Bank | ✓ |
| Hi Life | ✓ |
| Highgrove Bathrooms | ✓ |
| Hitachi | ✗ |
| Hi-Tec Oils | ✗ |
| Holden | ✓ |
| Holy Spirit | ✓ |
| Home Timber & Hardware | ✓ |
| Honda | ✓ |
| Hopscotch Films | ✓ |
| Hostplus | ✓ |
| Hotels Combined | ✓ |
| Hotels.com | ✓ |
| Hungry Jacks | ✓ |
| Huon Aquaculture Group | ✗ |
| Hyundai | ✓ |
| IAG | ✓ |
| Icon Films | ✗ |
| Iconic, The | ✓ |
| IGA | ✓ |
| iGlobe | ✗ |
| iiNet | ✓ |
| Ikea | ✓ |
| ILVE | ✓ |
| Impressions Furniture | ✓ |
| InDepth Cases | ✓ |
| Industry Super Funds | ✓ |
| Infiniti | ✓ |
| ING Direct | ✓ |
| Innovative Hair Loss Solutions | ✓ |
| Instant Response Marketing | ✓ |
| Instant Scratch-Its | ✓ |
| Institute of Urban Indigenous Health | ✓ |
| Insuranceline | ✓ |
| Intrepid Travel | ✓ |
| Invocare | ✓ |
| Isuzu Mu-X | ✓ |
| iVoisys | ✗ |
| J Farren Price | ✓ |
| Jackwelg | ✗ |
| Jag Kitchens | ✓ |

| SBS Advertiser | Free TV Advertiser |
|-------------------------------------|--------------------|
| Jalna Dairy Foods | ✓ |
| James Cook University | ✗ |
| Jarvis Ford | ✓ |
| Jarvis Subaru | ✓ |
| Jemena Gas Works | ✓ |
| Jetset Travel Group | ✓ |
| Jetstar | ✓ |
| Juicy Isle | ✓ |
| Jura | ✓ |
| Just Car Insurance | ✓ |
| K.M. Smith | ✓ |
| Kathmandu | ✓ |
| Kellogg's | ✓ |
| Kelly Country Factory | ✓ |
| Kerala Tourism | ✗ |
| Kia Motors Australia | ✓ |
| Kimberly Clark | ✓ |
| Kincardine Holdings | ✗ |
| King Furniture | ✓ |
| Kitchen Craftsmen | ✓ |
| Kmart | ✓ |
| Kmart Orion | ✓ |
| Korean Tourism | ✗ |
| Kraft Foods | ✓ |
| La Trobe University | ✓ |
| Ladbrokes | ✓ |
| Land Rover Australia | ✓ |
| Leal Technology | ✓ |
| Legacy | ✓ |
| Leimo | ✓ |
| Lexus | ✓ |
| Lexus of Adelaide | ✓ |
| LFB Australia | ✗ |
| Liberal Party Victoria | ✓ |
| Lilydale | ✓ |
| Lindt | ✓ |
| Lion | ✓ |
| Lion Nathan | ✓ |
| Liqui Moly | ✓ |
| Live Nation Global | ✓ |
| Liverpool City Council | ✗ |
| Local Government Association | ✓ |
| Local Government Association of QLD | ✓ |
| L'Oreal | ✓ |

| SBS Advertiser | Free TV Advertiser |
|------------------------------|--------------------|
| Lotterywest | ✓ |
| Lovehoney | ✓ |
| Lucky Lotteries | ✓ |
| Mannix Air | ✓ |
| Mars | ✓ |
| Massel | ✗ |
| Mastercard | ✓ |
| Masterfoods | ✓ |
| Mattel | ✓ |
| Mazda | ✓ |
| McDonalds | ✓ |
| McLernons | ✓ |
| Meals On Wheels SA | ✓ |
| Médecins Sans Frontières | ✗ |
| Medibank | ✓ |
| Melbourne Hot Rod Show | ✓ |
| Melbourne Museum | ✓ |
| Melbourne Rebels | ✓ |
| Melbourne Star | ✓ |
| Melbourne Symphony Orchestra | ✓ |
| Mentally Healthy WA | ✓ |
| Mercedes Benz | ✓ |
| Mercedes Benz Adelaide | ✓ |
| Mercedes Benz Melbourne | ✗ |
| Mercy Ships | ✓ |
| Metcash | ✓ |
| Metro Tiles | ✓ |
| Microsoft | ✓ |
| Miele Australia | ✓ |
| Millmaine Entertainment | ✓ |
| Mint Kitchens | ✓ |
| Mitre 10 | ✓ |
| Mitsubishi Electric | ✓ |
| Mitsubishi Motors | ✓ |
| MLC | ✓ |
| Mondelez | ✓ |
| Motorsports NT | ✓ |
| Mountain Engineering | ✓ |
| MS Society of SA & NT | ✓ |
| MSF | ✓ |
| Mt Buller | ✓ |
| Murdoch University | ✓ |
| National Australia Bank | ✓ |
| National Gallery Victoria | ✓ |

| SBS Advertiser | Free TV Advertiser |
|---------------------------------------|--------------------|
| Natuzzi | ✓ |
| Natuzzi Adelaide | ✓ |
| Nestle | ✓ |
| New Generation College | ✗ |
| New Town Toyota | ✓ |
| Newcastle Permanent | ✓ |
| News Corporation | ✓ |
| Nike | ✓ |
| Nine Live | ✓ |
| Nissan | ✓ |
| Nitro Circus | ✓ |
| No Odd Socks | ✗ |
| Northern Territory Tourism Commission | ✓ |
| NRMA | ✓ |
| NRMA Motoring & Services | ✓ |
| NSW Art Gallery of NSW | ✓ |
| NSW Cancer Institute of NSW | ✓ |
| NSW Compensation Lawyers | ✗ |
| NSW Dept of Health | ✓ |
| NSW Fire & Rescue NSW | ✓ |
| NSW Lotteries | ✓ |
| NSW National Disability Service | ✓ |
| NSW Nurses Association | ✓ |
| NSW Taronga Zoo | ✓ |
| NSW Transport For NSW | ✓ |
| NTEU | ✓ |
| Officeworks | ✓ |
| Officeworks Orion | ✓ |
| Open Training Institute | ✓ |
| Open Universities | ✓ |
| Opera Australia | ✓ |
| Optical Superstore, The | ✓ |
| Optus | ✓ |
| Origin Energy | ✓ |
| P&O | ✓ |
| Pacific Brands | ✓ |
| Palamino Plastic Products | ✓ |
| Paramount Pictures | ✓ |
| Parmalat | ✓ |
| People's Choice Credit Union | ✓ |
| Pepsico | ✓ |
| Persian Palace | ✗ |
| Personalised Plates Queensland | ✓ |
| Perth Racing | ✓ |

| SBS Advertiser | Free TV Advertiser |
|---|--------------------|
| Peugeot | ✓ |
| Pfizer | ✓ |
| Pfizer | ✓ |
| Pharmacare | ✓ |
| Pizza Hut | ✓ |
| Plan Australia | ✓ |
| Plush | ✓ |
| Police & Nurses | ✓ |
| Potato Marketing Corporation WA | ✓ |
| Powerball | ✓ |
| Precious Metals Sydney | ✓ |
| Pregnancy, Babies & Child Expo | ✓ |
| Princess Pictures | ✗ |
| Procter & Gamble | ✓ |
| Progressive Direct Insurance | ✓ |
| Property Wizards | ✓ |
| Puig | ✓ |
| Puma Media | ✗ |
| Punch Media | ✗ |
| Qantas | ✓ |
| QBE | ✓ |
| QLD Dept of Communities | ✓ |
| QLD Dept of Education Training Association | ✓ |
| QLD Dept of Environment & Heritage Protection, National Parks, Recreation, Sport & Racing | ✓ |
| QLD Dept of Health | ✓ |
| QLD Dept of Premier & Cabinet | ✓ |
| QLD Dept of Treasury & Trade | ✓ |
| QLD Performing Arts Centre | ✓ |
| QLD Police | ✓ |
| QLD Theatre Company | ✓ |
| QLD Transport | ✓ |
| QM Properties | ✓ |
| Qualify Me | ✗ |
| Queensland Treasury | ✓ |
| Queensland University of Technology | ✓ |
| Quit Tasmania | ✓ |
| RAA | ✓ |
| Rabobank | ✓ |
| RAC (WA) | ✓ |
| RACQ | ✓ |
| RACQ Club Membership | ✓ |
| RACQ Insurance | ✓ |

| SBS Advertiser | Free TV Advertiser |
|----------------------------------|--------------------|
| Radio Rentals | ✓ |
| Rams Home Loans | ✓ |
| Raw Pearls | ✓ |
| Real Insurance | ✓ |
| Rebel Sport | ✓ |
| Recognition | ✗ |
| Red Cross | ✓ |
| Regency Beach Club | ✓ |
| Regency Real Estate | ✓ |
| Renault | ✓ |
| Rentlo | ✓ |
| Retail Food Group | ✓ |
| Ride Bellerive | ✓ |
| Ride To Conquer Cancer | ✓ |
| Rinnai | ✓ |
| Rise Up Australia Party | ✓ |
| Rise Waterfront | ✓ |
| River 2 Reef Ride | ✗ |
| Royal Academy of the Arts | ✓ |
| Rugs A Million | ✓ |
| Rundle Mall Management Authority | ✓ |
| Russell Morris | ✓ |
| SA Adelaide Festival Centre | ✓ |
| SA Adelaide Film Festival | ✓ |
| SA Country Fire Service | ✓ |
| SA Dept of Premier & Cabinet | ✓ |
| SA HomeStart Finance | ✓ |
| SA Lotteries Commission | ✓ |
| SA Motor Accident Commission | ✓ |
| SA Motor Sport Board | ✓ |
| SA Quality Home Improvements | ✓ |
| SA Safe Work | ✓ |
| SA State Electoral Office | ✓ |
| SA Tourism Commission | ✓ |
| Salvation Army Sydney | ✓ |
| Salvo Property | ✓ |
| Samsung | ✓ |
| San Remo | ✓ |
| Sanofi | ✓ |
| Save the Children | ✓ |
| Scenic Tours | ✓ |
| Scoot | ✓ |
| Senior's Choice, The | ✗ |
| Sequoia | ✗ |

| SBS Advertiser | Free TV Advertiser |
|-----------------------------------|--------------------|
| Shannons Insurance | ✓ |
| Shaver Shop | ✓ |
| Shell | ✓ |
| Shock Entertainment | ✓ |
| Simplot | ✓ |
| Skoda | ✓ |
| Smith Family | ✓ |
| Smiths | ✓ |
| Snooze | ✓ |
| Sofa Shop, The | ✓ |
| Sony Music | ✓ |
| Sony Picture Releases | ✓ |
| Sony Playstation | ✓ |
| Sound Centre | ✓ |
| Southbank Institute of Technology | ✓ |
| Specialty Fashion Group – Millers | ✓ |
| Specsavers | ✓ |
| Sportingbet | ✓ |
| St Vincent de Paul | ✓ |
| State Opera South Australia, The | x |
| Steadfast | ✓ |
| Stop & Pose | x |
| Straight Smile Centre | ✓ |
| Stratco | ✓ |
| Stuart Alexander | ✓ |
| StudioCanal | ✓ |
| Subaru | ✓ |
| Subway | ✓ |
| Sun Rice | ✓ |
| Suncorp | ✓ |
| Suncorp Direct Life Insurance | ✓ |
| Sunnybank Community & Sport Club | ✓ |
| Sunsuper | ✓ |
| Super A-Mart | ✓ |
| Supercell | ✓ |
| Supercycle | x |
| SureSafe | x |
| Swisse Vitamins | ✓ |
| Sydney Opera House | ✓ |
| Sydney Symphony Orchestra | x |
| SydneySide Media Furniture | x |
| TAB | ✓ |
| TAB Sportsbet | ✓ |
| Target | ✓ |

| SBS Advertiser | Free TV Advertiser |
|---|--------------------|
| Target Orion | ✓ |
| TAS Dept of Premier & Cabinet | ✓ |
| Tatts | ✓ |
| Telstra | ✓ |
| Thule Australia | x |
| Titan Sheds | ✓ |
| TJM Equipped | ✓ |
| Tobin Brothers | ✓ |
| TomWaterhouse.com.au | ✓ |
| Tourism Events QLD | ✓ |
| Tourism Tasmania | ✓ |
| Tourism Victoria | ✓ |
| Toyota | ✓ |
| TPG | ✓ |
| Transmission Films | ✓ |
| TREAC | ✓ |
| TRG | ✓ |
| Trivago GmbH | ✓ |
| TT Line | ✓ |
| Tuff Trucks | x |
| Underground Opera, The | x |
| UNHCR | ✓ |
| Universal Music | ✓ |
| University of Adelaide | ✓ |
| University of Queensland | ✓ |
| University of Southern Queensland | ✓ |
| University of Tasmania | ✓ |
| VIC Dept of Education & Early Childhood Development | ✓ |
| VIC Dept of Health | ✓ |
| VIC Dept of Human Services | ✓ |
| VIC Dept of Innovation, Industry & Regional Development | ✓ |
| VIC Dept of Justice | ✓ |
| VIC Dept of Premier & Cabinet | ✓ |
| VIC Dept of State Development, Business & Innovation | ✓ |
| VIC Dept of Sustainability | ✓ |
| VIC Dept of Transport | ✓ |
| VIC Dept of Treasury & Finance | ✓ |
| Victoria's Basement | ✓ |
| Village Roadshow | ✓ |
| Virgin Money | ✓ |
| Visa International | ✓ |
| Vodafone | ✓ |
| Volkswagen Australia | ✓ |

| SBS Advertiser | Free TV Advertiser |
|--------------------------------|--------------------|
| Volvo | ✓ |
| WA Office of Road Safety | ✓ |
| WA Tourism Commission | ✓ |
| WA Water Corporation | ✓ |
| Walt Disney Home Entertainment | ✓ |
| Walt Disney Motion Pictures | ✓ |
| Warner Music | ✓ |
| Warner Village Theme Parks | ✓ |
| Weber Australia | ✓ |
| Webjet | ✓ |
| Western Power | ✓ |
| Westnet | ✓ |
| Westpac | ✓ |
| Wiggle | ✗ |
| Windsor Smith | ✓ |

| SBS Advertiser | Free TV Advertiser |
|-------------------------|--------------------|
| Womad | ✓ |
| Woolworths Insurance | ✓ |
| Woolworths Supermarkets | ✓ |
| World Property | ✗ |
| World Vision | ✓ |
| World Wildlife Fund | ✓ |
| Wrigley's | ✓ |
| WSPA | ✓ |
| Yakult | ✓ |
| Yalumba | ✓ |
| Yamaha | ✓ |
| Yellow Pages | ✓ |
| Zinmoto | ✓ |
| Zuji | ✓ |

Source: SBS 2014 Annual Report and Nielsen Adex Data. Compares SBS Television Advertiser List (for period 01/07/13 – 30/06/14) sourced [SBS 2014 Annual Report](#): Appendix 15 (SBS One and SBS 2) with Nielsen [AdEx data](#) (comparable period 07/07/2013 - 5/07/14) for all television advertisers on both commercial free-to-air metro networks and SBS advertisers to isolate those advertisers that advertise on SBS only (marked with an X) .