



21 March 2006

The Secretary  
Standing Committee on  
Communications, Information Technology and the Arts  
House of Representatives  
Parliament House  
CANBERRA ACT 2600

**Attention: Dr Anna Dacre**

Dear Dr Dacre

## **COMMUNITY BROADCASTING INQUIRY**

Southern Cross Broadcasting (Australia) Limited welcomes the opportunity to make a submission to this Inquiry.

Southern Cross Broadcasting acknowledges the important role played by community broadcasting, creating a forum for community interaction and the representation of minority groups and cultures. However, in the context of community radio, we query whether the allocation of FM spectrum for use by community stations is the most efficient use of that spectrum.

The concepts of “community purposes” and “community interest” under the Broadcasting Services Act have (properly) resulted in the issue of community broadcasting licences to groups serving niche audiences. Such services, where they operate on the FM band, enjoy high quality sound and are widely available with clear reception. At the same time, other popular and high rating commercial radio services, such as 3AW in Melbourne and 4BC in Brisbane, continue to operate on the AM band and suffer high levels of signal interference which significantly impacts on the public’s enjoyment of those services. Indeed, in some markets, the level of interference to AM services is such that the ability of commercial AM broadcasters to meet the conditions of their licences, namely, to contribute to the provision of an adequate and comprehensive range of broadcasting services in the licence area, should be seriously questioned because of these technical limitations.

Southern Cross Broadcasting submits that consideration should be given to making spectrum available on the AM rather than the FM band for community broadcasting, to enable commercial AM services that suffer from signal interference to access supplementary FM spectrum to improve reception into AM reception black spot areas. Such a strategy would provide a significant benefit to the large number of listeners who currently suffer from interference to commercial AM services, but is much less likely to

impact on a community station, whose transmitter is likely to be located close to the community it seeks to serve. We submit this would also be entirely consistent with the objects of the Broadcasting Services Act, notably the object of providing a regulatory environment that will facilitate the development of a broadcasting industry in Australia that is efficient, competitive and responsive to audience needs.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Tony Bell', with a long horizontal flourish extending to the right.

**Tony Bell**  
Managing Director