



Ms Roxane Le Guen
Committee Secretary
Senate Environment, Communications, Information Technology and the Arts
References Committee
Parliament House
CANBERRA, ACT, 2600

BY FAX 02 6277 5818

Dear Ms Le Guen

Re: Broadcasting Services Amendment (Media Ownership) Bill 2006

Radio 4VL is a heritage commercial radio station based in Charleville and has been operating since 1935.

This station covers the second largest geographic commercial radio service area in Australia with the second smallest population, and, corresponding revenue base.

We certainly fall into the category of a regional broadcaster.

Operating a station like this as a truly local operation has been very difficult during the eight years since my wife and I bought the station.

This task has been made all the more difficult by the ACMA and its predecessors licencing community and narrowcast stations in Charleville and surrounding towns without regard to the viability of the local media marketplace.

On the surface this appears a noble government gesture, but 2% of revenue lost here and 4% lost there makes it virtually impossible to pull stations like ours into profit as evidenced in our annual returns.

For the record, 4VL broadcasts 5 regional news bulletins each day compiled by our own newsperson and we are constantly broadcasting community service announcements or items of interest to the community throughout the broadcast day.

We already voluntarily well exceed these proposed compulsory 'localism' provisions, which have evidently been suggested as a compromise solution to push cross-media ownership through.

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However, I believe the suggestion of the proposed regulatory provisions on regional stations is discriminatory and flawed and a reversion to times when similar draconian provisions were in place and were eventually scrapped because they just didn't work.

The only stations you will end up punishing through the inclusion of these provisions are small, family-owned stations like ours who are actually providing a local service voluntarily.

We will be left with major additional costs to prove compliance and for preparing lengthy reports that no one will ever look at at the ACMA. We will then have less money to spend on our local news and local programming, and, at the end of the day, when it comes time to sell and retire, there will be fewer buyers and our commercial radio businesses will be worth far less than they should be.

The large bank or institution owned stations will always find a way around the new provisions, which by the way are a token of what should be done locally on a voluntary basis.

True regional radio is a business of passion. Passion to serve your community and passion to always improve – to make tomorrow's on-air service one step better than today's.

However, today, in all industries you will find companies, run by accountants, who have no passion to serve anyone but their shareholders and their own personal annual bonuses.

These proposed provisions will not change that culture.

4VL and its licensee company, Pinecam Pty Ltd, strongly urges you not to put this discriminatory impost on regional broadcasters, but to reject the Broadcasting Services Amendment (Media Ownership) Bill 2006 in its entirety.

We all know the only reason the Bill is going through is to produce economies of scale for the big players and allow for the building of media conglomerates. The Bill has no public benefit at all.

However, if you do find it is necessary to impose 'localism' restrictions and provisions then be serious about them, make them count and not be simply a token.

For stations with a service population over 10000 impose a mandatory live breakfast show broadcast from the town of licence.

Allow stations to take a syndicated program, like John Laws, between 9am-midday, but, for stations with populations in excess of 20000 mandate 3 hours live every afternoon from the town of licence.

Of course, you should allow these stations to use productivity tools, like automation, but regulate the actual announcer be rostered on during the on-air shift and be working within the station premises in the town of licence.

For populations over 30,000, you should mandate that the station be 'live and local' until 6pm.

In addition, make it compulsory to air five or six regional news and sport bulletins every week day, and air at least 10 community service announcements each day. That's less than two per hour 6am to 6pm.

Don't pussyfoot around and wait for this proposed 'trigger event'. Implement these changes right now if you are really serious.

However, if you are only negotiating a political deal to placate rebel National Party senators, I urge you to lay off the most defenseless members of the commercial broadcasting community and please don't make small regional broadcasters your convenient scapegoat.

Reject the Bill and reject these proposed draconian 'localism' provisions.

Yours sincerely



BRAD SMART
Managing Director