



Media Policy Division

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

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11 November 2024

Radio Prominence on Smart Speakers

Thank you for the opportunity to provide this submission in response to the Department's Radio prominence on smart speakers proposals paper (**Proposals Paper**).

We recognise the objective of ensuring that radio stations can be easily accessed and discovered via voice assistants on smart speakers. Our view is that any regulatory intervention should be evidence-based, proportionate, and protect the ability of businesses, like Amazon, to continue to invest in a great experience for our customers.

Alexa

Amazon's mission is to be Earth's most customer-centric company. Our corporate philosophy is rooted in working backwards from what customers want and continuously innovating to provide a better experience. Since Amazon launched Alexa in Australia in 2018, we have continued to invest significantly in providing the best and most accessible experience for customers.

We know that Alexa can only be successful if it provides customers with convenient access to a broad selection of content. In our experience, customers expect and want access to radio. To this end, Alexa customers can access the vast majority of the radio broadcasts they want by simply saying the name of the station in their request to Alexa ("Alexa, play ABC Classic") and Alexa will play the radio stream which best matches the customer's request.

We consider radio networks our partners in providing customers with a broad selection of content, and we also consider them to be our customers. That's why we want to make it as easy as possible for radio networks to make their streams available via Alexa. We have invested in our Radio Skills Kit (RSK), which is a self-service tool that removes many technical and financial barriers that would otherwise be faced by local, community and independent stations in trying to reach listeners via voice assistants. RSK provides a scalable route for hundreds of stations to reach listeners regardless of size. It also makes technical innovations available to our radio partners, enabling them to provide appealing features to their listeners, for example multi-room casting (so that customers can listen to the same station on different devices and in different rooms at the same time) and radio alarms ("Alexa, wake me up to Nova at 7am"). It gives radio providers access to insights into how customers use their radio stream. For example, we provide aggregate listening data such as the total listening duration for a station and the average listening hours per customer; data that is used by radio networks to inform their



programming and commercialisation strategies. Alexa continues to work hard to invest and scale an experience that all radio stations can benefit from.

We have worked closely with networks and industry bodies to onboard and test their stations on RSK since its launch, and as of 2024, there are well over 400 stations available in Australia, including metro, regional, commercial, community, independent and publicly-funded stations. Additionally, we have a local team with in-depth radio and media knowledge who provide on-the-ground support if issues arise. We have partnered with SCA, ARN, ABC, Nova, Nine Radio, CRA and CBAA to actively promote this coverage, driving awareness and discoverability with a common goal of making it easier for audiences to find their desired radio station on Alexa.

The proposed radio prominence framework

We support the objective that “Australians continue to have equitable access to the radio services they rely on in the digital age.” We believe freedom of access and choice help provide the best possible customer experience. The radio industry are our partners, and we support them in reaching new audiences via Alexa.

Given the ready accessibility of radio services via smart speakers in Australia, we believe there is insufficient evidence to support a legislative intervention at this time. Instead we urge the Government to engage with radio partners and technology providers to assess whether barriers exist, and if so, determine the most appropriate response, including less prescriptive measures that would support radio whilst enabling ongoing innovation and investment in the customer experience.

We note the Proposals Paper cites data dating back to 2018 (for example, the Voice Request Audit undertaken by Commercial Radio & Audio). Taking a first step of industry engagement would enable stakeholders to collect more recent data about the availability and delivery of radio in light of industry and technological developments.

Comments on the Proposals Paper

While we believe the case for legislative intervention has not been made, we provide the following comments should the Government proceed with legislation. As an overarching observation, we emphasise that voice assistants remain an emerging technology, and urge the Government to ensure that any new framework retains enough flexibility to enable experimentation and innovation on behalf of customers.

The focus on voice assistants on smart speakers

Voice assistants via smart speakers are one of many ways that customers can access radio. As found in the *Television & Media Survey 2023* (Survey) and cited in the Proposals Paper, “the points of access for radio and radio-like content have proliferated,” and FM, AM and DAB radio were listened to on a number of devices, including car audio systems, dedicated radios, smartphones, computers/tablets/laptops, and smart speakers.



It is clear from that Survey that radio is predominantly accessed on car audio systems; as the Proposals Paper states, “Radio broadcasts (FM and AM) were most commonly consumed in cars in 2023 (87 and 78 per cent of Australians, respectively, who listened to audio content in the past 7 days).”

The latest 2024 *Infinite Dial* report by Edison Research notes that radio station apps are the most common way to listen to streaming audio (61% of surveyed respondents), followed by station websites (54%), aggregator apps and websites (38%), and finally smart speakers (36%). The report also shows that streaming radio listening in cars rose by 75% in two years from 2022-2024.¹

This data does not support legislation narrowly targeting voice assistants via smart speakers as outlined in the Proposals Paper. A narrow approach that excludes the most popular ways in which Australians access radio risks creating a fragmented and unlevel regulatory landscape, with some routes covered and others not.

The requirements for regulated radio services

If a legislative approach is pursued, it should recognise all the relevant parties who have a role to play in providing access to radio content to Australian customers, and impose obligations on these parties, including radio providers. The Proposals Paper states that the proposed framework would “require that regulated radio services be technically capable of integration with a voice activation software if they are to be afforded prominence.” This is an important requirement for radio providers as it would promote the objective of “consistent and reliable access.” We believe it is also appropriate that any “must carry” obligation is coupled with a “must offer” obligation, requiring radio providers to make their streams available to distributors that meet certain minimum requirements.

As stated above, we invest significantly in Alexa and RSK to provide our radio partners with self-service tools. While we assist radio partners to triage technical issues, ultimately radio providers own their streaming endpoints and are best placed to ensure their streams are working as expected. Any proposed framework should not render voice assistant operators liable for technical issues beyond their control.

The no cost model

The proposed prohibition on regulated access providers imposing a fee, charge or other form of consideration for providing the required level of prominence is not consistent with an approach that supports ongoing innovation and investment in the sector. There are costs associated with building and maintaining a voice assistant service, and ensuring a level of ongoing innovation that directly benefits radio providers. This prohibition risks undermining the ability of voice assistant providers to continue investing in improving their products and services and the overall customer experience in the future.

¹ <https://www.edisonresearch.com/wp-content/uploads/2024/08/Infinite-Dial-2024-Australia-Presentation.pdf>.

**The access pathway**

We note the proposal to “allow regulated access providers (voice assistant platforms) to use a source or pathway of their choice to provide access to regulated radio services.” We support the statement in the Proposals Paper that “this would allow access providers to surface content in the most efficient and effective way possible.” It is important that any framework enables voice assistant providers to continue to prioritise the customer experience and innovate.

The regulated radio services

We also appreciate the proposed application of any regulatory framework to online simulcasts. As noted in the Proposals Paper, if it were to include all audio services provided by regulated radio service providers, it would be “a significant amount of streaming and on-demand content ... (and as such it) would be unreasonable to require the providers of smart speakers to accurately surface all of this content, particularly when it may be ephemeral (available for only a limited time period), and may not be identifiable as being provided by a particular broadcaster.”

Phasing in any new framework

In our view, if a new framework were to be implemented, then it would require at least 18 months for transition ahead of commencement of any legislation.