



# **Prominence Framework for Radio on Smart Speakers**

**November 2024**

ANRA welcomes the opportunity to respond to the recent Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDC) submission “Prominence Framework for Radio on Smart Speakers”. Our comments reflect the consensus of our membership. However individual members may make their own submissions.

ANRA, the Australian Narrowcast Radio Association, is the peak industry body representing Low Power Open Narrowcast (LPON) Radio services and High Power Open Narrowcast (HPON) Radio services located across all States and Territories of Australia.

Our membership includes the major Narrowcast radio program providers such as niche music services, foreign language groups, racing radio, tourist services, indigenous and religious services, as well as many other diverse, independently owned and operated services.

As such, these narrowcast radio services add valuable diversity to the broadcast landscape by providing content not necessarily available on other radio formats and which have an emphasis on local content.

ANRA appreciates the opportunity to make this submission and is aware that DITRDC has a good understanding of the ongoing development of the Narrowcast sector when making decisions that may impact its future growth.

Regards,  
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**Australian Narrowcast Radio Association**

## **ANRA's Submission on key elements:**

- ***The entities and services to be given prominence under the framework;***

ANRA supports the need for the Government and Department of Infrastructure, Transport, Regional Development, Communications and the Arts to develop a prominence framework for Australian radio services on smart speakers for Australian free to air broadcast radio on smart speakers.

ANRA also wishes to advocate that licensed Narrowcasting Services must be included in the definition of "Australian radio services".

With over 30 years of service and 300+ operators of 2600+ High Powered and Low Powered Narrowcast Licences throughout Australia the inclusion Narrowcasting in these discussions is imperative especially in regard to regional radio and local content.

Query: Will the Department provide specific criteria for the inclusion of Narrowcast services, and how will the regional focus be balanced with metropolitan coverage?

- ***The services that would be required to comply with prominence obligations for local radio services;***

It is ANRA's view that any provider of smart speakers in the Australian market should be required to comply with prominence obligations for local radio services. In broad terms a 'provider' would be the entity responsible for managing the operating system of smart speakers located in Australia, irrespective of where they were made or purchased.

Query: How will compliance be monitored and enforced to ensure smart speaker providers adhere to these obligations, especially given the rapid evolution of such technologies?

- ***The level of prominence afforded to radio services;***

If asked by name, the service should give priority to Australian radio stations. If asked by Genre (eg News, Racing, Sports or a particular Music Genre), priority should be given to the matching Australian services in the radio licence area where the user is located.

Query: What measures will be taken to avoid biases in algorithmic responses that may favour larger, more mainstream broadcasters over niche services like racing radio/etc?

- ***The extent to which the framework governs the exchange of money between parties, and permits the alteration of a radio service (i.e. advertising or sponsorship);***

In the event that a smart speaker provider leverages the live streams of Australian radio stations for their own revenue (for example, subscription fees or "pre-roll" advertising playing before the stream starts), fair remuneration should be afforded to the radio station service.

Additionally, the radio station streaming service should not be altered for any reason, for example, no insertion of advertising mid-stream.

Careful scrutiny should also be given to the nature of such “pre roll” advertising associated with services to ensure it is in keeping with the nature of the service and the audience it caters for. For example, it would be inappropriate to feature advertisements for a direct competitor of the radio station, or for gambling or alcohol on a station catering for children, and so on.

All such advertising should comply with broadcast advertising regulations and we recommend a Codes of Practice be considered.

Query: Will there be a standardised model for revenue sharing between radio stations and smart speaker providers, and how will this be operated and disputes be managed?

Query: How will the framework ensure that smart speaker providers comply with broadcast advertising regulations, particularly when ads are dynamically inserted?

- ***The degree to which the framework stipulates how Australian radio content is accessed, and the minimum technical and other operational standards to do so.***

As services stream at different qualities the service should not be re-streamed at a lower quality than the original service.

Query: Will there be an enforcement mechanism for maintaining streaming quality, and how will differences in technical standards across platforms be managed?

## **Conclusion**

ANRA congratulates the Government and the Department on their forward thinking on the prominence framework, and the commitment to modernise media regulations.

ANRA looks forward to the inclusion of the Narrowcast Sector in these and future discussions on Radio Prominence on Smart Speakers.