



19 December 2013

The Hon Mr Malcolm Turnbull MP
287-289 New South Head Road,
Edgecliff, NSW 2027

CC: The Hon Paul Fletcher MP, Parliamentary Secretary for Communications

Dear the Hon Mr Malcolm Turnbull MP,

Re: Deregulation Initiatives in the Communications Sector

Thank you for your letter dated 26 November 2013. The CBAA welcomes your commitment to remove unnecessary regulation in the communications sector.

Recommendations for reform

The CBAA does not have any measures to recommend for immediate consideration but is in the process of identifying long-term proposals for reform. The community broadcasting sector is diverse and supported by the efforts of more than 22,000 volunteers. The CBAA is exploring options to ensure that the Australian Communications and Media Authority's approach to regulation of community broadcasters is consistent with the Government's approach to not-for-profit regulation, with the aim of identifying appropriate reporting and administration requirements for volunteer-run stations with diverse needs.

We respectfully request that the CBAA is consulted on any proposals for broadcasting reform being considered for the Regulation Repeal Day in early 2014 in order to assist the Department of Communications in identifying the likely impact on the community broadcasting sector.

Comments on *Deregulation in the Communications Portfolio, Framing Paper*

The CBAA supports the approach of using 'enduring concepts' as the basis for public policy objectives. However, the concept of localism is absent from the list presented in Attachment Two.ⁱ Community broadcasting services exist to meet local needs and provide diverse services. This is recognised in the Explanatory Memorandum for the *Broadcasting Services Act 1992*, which states:

*'Community broadcasters differ from other broadcasting services in that they have a local focus and role in attracting local community participation in broadcasting... This third dimension of the broadcasting industry adds to diversity of ownership and programming by reflecting a different range of views, priorities and institutional pressures.'*ⁱⁱ

Radio streaming services are changing the geographic footprint of some stations but community broadcasters are assigned a licence on the basis of a physical area and must engage with the local community. Localism remains important to the community broadcasting sector and should be included in any core principles that would guide the Department's approach to deregulation.

If you have any questions about this letter or community broadcasting generally, please contact the CBAA on 02 9318 9611 or eturner@cbaa.org.au

Kind regards,

A handwritten signature in blue ink, appearing to read 'Jon Bisset', with a stylized flourish at the end.

Jon Bisset
General Manager, Community Broadcasting Association of Australia

ⁱ For an outline of localism as an enduring concept see ACMA (2011), *Enduring concepts: Communications and media in Australia*, ACMA, Sydney pp 42-50.

ⁱⁱ Explanatory Memorandum, *Broadcasting Services Act 1992* Cth, Part 6.