The Executive Manager  
Planning Branch  
Australian Communications & Media Authority  
P.O. Box 34  
BELCONNEN ACT 2616

Dear Sir,

RE: Draft LAP Variation – Wagga Wagga

ABA File Ref: 2002/0782

I write in response to the circulation of the Revised Draft Variation to the Wagga Wagga Licence Area Plan, on behalf of Riverina Broadcasters (Holdings) Pty Ltd, the licensee of commercial radio broadcast services 2WG and 2WZD Wagga Wagga.

As advised in Riverina Broadcasters’ previous submission on the question of the extension of service areas for community broadcasters, it remains this company’s contention that the commercial broadcasters 2WG and 2WZD have, over a long period, provided adequate and comprehensive service to the Riverina community. In recent times, areas including the Gundagai and Tumut Districts have benefited from the extension of these services by way of the Commercial Radio Black Spots Initiative, funded by the Dept of Communications, Information Technology and the Arts (DoCITA).

It is important to note that translators funded by DoCITA for 2WZD Tumut and 2WG Gundagai would not have been economically viable to install and operate had there not been assistance from the Black Spots Initiative. This is due to the relatively small population and commercial service base in each location.

LOCALISM Vs REGIONALISATION

Community Broadcasting stations have evolved to service the localities in which they are based. These locations have traditionally contained a homogenous community-of-interest and have been of a size capable of
providing economic and human resources support to the broadcaster. Wagga and to a lesser extent Tumut have been examples of local areas with suitable support resources capable of sustaining local community broadcasters.

Community radio stations have had the advantage of their capacity to have a sharp concentration on local community issues and synergies, due to their tight geographic focus, whereas the commercial and national ABC broadcasters have had a charter to provide comprehensive service and coverage to broader regions.

It is therefore surprising, and somewhat disturbing, that local community broadcasters such as 2AAA and 2TVR are now seeking to expand their coverage beyond the traditional local boundaries to become “Regional Community” services.

Riverina Broadcasters is not opposed to smaller communities receiving access to community broadcasts. However, if community stations such as 2AAA and 2TVR do extend their coverage to towns such as Gundagai, Coolamon and Talbingo, the most likely ramification will be a reduced concentration on Wagga or Tumut issues, replaced by a more generalised regional service – the same regional service now provided to, and paid for by the public via the ABC Regional Radio Service. There would, in effect, be a degradation of community programming focus through having to accommodate the interests of a wider and less-homogenous community.

The cost of establishing and running new translators in towns with small populations (Gundagai 1,997; Coolamon 1,350; Talbingo 297) will also have a significant impact on the operating viability of the community broadcasters concerned. The cost of transmitters and program link equipment, antennae and equipment housing, electricity and site leasing must be taken into consideration. From historic data, it is unlikely that new revenue sources in such small centres will cover the cost of operation. If income from subscriptions and sponsorship derived from the larger, traditional listener centres is used to subsidise the new translators, the result for those larger centres and the new locations alike could well be a poorer standard of programming due to higher operating costs. This would be contrary to the interests of the existing listening public in Wagga and Tumut.

GUNDAGAI

Such problems as listed above would be compounded in Gundagai, to where both 2AAA and 2TVR are seeking to extend their boundaries. What little operating revenue might be attained from the people and businesses of Gundagai would then be split across two effective competitors, both of which have vouched to provide similar services. This is neither a particularly viable proposal for either station, nor a promotion of diversity of programming. Consequently, it is not an efficient use of the broadcasting Services Bands spectrum. It is possible that both stations may end up placing a greater dependence on alternative sources of operating funds, such as Government grants.

Riverina Broadcasters contends that for the reasons stated above, quality of local community content in programming is unlikely to be any better in Gundagai than the localisation already provided by ABC Regional Radio and the commercial stations 2WG and 2WZD. Therefore, the reasoning behind the proposal to extend coverage of the community stations into Gundagai - increased localism - would be flawed.
For the reasons of existing adequate localism, financial strain for the community stations and therefore doubtful benefit to the residents, Riverina Broadcasters is opposed to the proposals to extend the services areas of 2AAA and 2TVR to Gundagai.

If the ACMA Planning Branch determines that the population of Gundagai should have access to community radio for other reasons, it should acknowledge that permitting two community stations to compete for limited listeners would be detrimental to both licensees, for the reasons stated earlier. Licensing only one service for Gundagai would minimise the detriment to both services. Therefore, any ACMA LAP variation intent on providing community radio in Gundagai should make provision for only one, not two services.

In reviewing the ACMA’s own assessment of the applications to extend service areas to Gundagai, this company has agreed with the reported views of Mr Graeme Tickner, General Manager, Gundagai Council, that Gundagai has more in common with Tumut than Wagga Wagga. Local Government, shopping, sporting and entertainment synergies are stronger between Gundagai and Tumut than between Gundagai and Wagga.

CONCLUSION

Riverina Broadcasters and its parent entity Macquarie Regional Radioworks are concerned at the ACMA’s consideration, via this LAP variation proposal, of the concept of “regionalisation” of traditionally local community broadcasters. A community licensee’s obligation to fulfil its charter of localism and local access when applied across a larger geographic region with doubtful synergies becomes difficult and significantly more costly to achieve. There will be a real risk of programming losing its focus on local access, local events and local issues, the foundation tenets on which the concept of community broadcasting was established in the early 1970’s.

For these reasons, Riverina Broadcasters disagrees with the “regionalisation” of local community broadcasters in Wagga and Tumut and in particular will oppose the proposal to licence two Community Broadcasting translators in Gundagai.

Yours faithfully,

Jim Vasey
Group Engineering Manager
Macquarie Regional Radioworks

24th February 2006.