Submission to Draft LAP Variation

ACMA
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Closing Date:
22 September 2006

From:
The Octapod Association
2/231 King St
Newcastle, 2300, NSW

FILE REFERENCE 2006/823
Re: Explanatory Paper:

LAP for NSW Community Radio and Variations to Licence Area Plans for Sydney and Wollongong Radio

"ACMA proposes to make channel capacity available for a NSW community radio service to operate... 100.5 from Sugarloaf Range, Newcastle with a maximum ERP of 4kw (Omni-directional)...

"ACMA has received a proposal from the licensee of 2RPH, Radio for the Print Handicapped of NSW Co-operative Ltd (2RPH) to improve coverage of its community radio service in Sydney, especially in the Eastern Suburbs. 2RPH is also interested in extending coverage to other centres within NSW. 2RPH has applied to provide FM translators in Kings Cross, Newcastle and Wollongong. In each case making spectrum available for RPH would assist it in meeting its objectives. However, this option needs to be weighed against other potential demand for the channels." (page 2)

The Octapod Organisation supports this intention to open up this spectrum to community organisations such as RPH.

At the same time we wish to express to ACMA that we are extremely surprised that this option is now seen as viable, contrary to previous advice (as recently as October 2005) that there is no possibility of variation to the Newcastle LAP due to lack of available spectrum.

Through this submission we therefore wish to:

1. make ACMA aware of the existence of an aspirant group based in Newcastle which has been using the 100.5FM frequency for low-powered special events programming since 2003;

2. draw the Authority’s attention to our organisation’s ongoing requests for investigation into the possibility of a third community licence in Newcastle;

3. highlight that we consider that allocation of the frequency to Radio RPH on a state-wide basis and allocation of the 100.5FM frequency in Newcastle in particular on a 4KW signal would prejudice access to spectrum by any other community group on a low-power signal, including but not limited to TIN radio;

and

4. call for an open and transparent process into the allocation of any frequency for community use in Newcastle.
Please see the supporting information on the following pages, which is also contained in our recent submission to the current House of Representatives Standing Committee on Communications, Information Technology and the Arts.

We would very much appreciate an opportunity to discuss this matter further at your convenience.

Justine Lloyd  
Secretary,  
Octapod Association

Contact: Reichl Cheetham  
manager@tin.org.au  
(02) 49270470
1. Summary

1.1 Newcastle is Australia’s sixth largest city, and its largest provincial (non-capital) city.

1.2 Newcastle is emerging as a regional cultural capital, and cultural activity in the local area generally creates opportunities for young people – including the unemployed and the underemployed – to constructively engage with the community. The Octapod’s 10-year history of successful cultural development activity and leadership has significantly contributed to the profile of Newcastle as a cultural centre, and has led to an aspirant community radio group forming around an online radio station staffed by local young people working as volunteers.

1.3 There is currently no youth-focused community radio station in Newcastle, Hunter, or Central Coast areas. There is no regional youth-focused community station outside the state capitals with the exception of the Gold Coast. The Octapod believes that there is in fact a greater need for such services outside metropolitan centres, as there is a smaller range of youth activities and employment opportunities in regional areas.

1.4 Without such support for cutting-edge and youth-oriented projects, we suggest that a significant opportunity is therefore lost for young people in regional areas to participate in community media.
2 Background to the Octapod

2.1 The Octapod organisation is Newcastle's non-profit community arts and new media organisation. The Octapod has existed as incorporated association since 1996.

2.2 The Octapod hosts the This is Not Art (TINA) festival every year on the October long weekend with funding from the NSW Ministry of Arts, and a variety of local sponsors and supporters (see http://www.thisisnotart.org/Sponsors/tabid/114/Default.aspx).

2.3 Projects initiated by local young and unemployed people (including on-line, print, visual arts and new media) have been successfully hosted by the Octapod Association over the last ten years.

2.4 The Octapod is an affiliate member of the Community Broadcasting Association of Australia.

2.5 Since mid-2005, the Octapod has been developing a project proposal for a broadband wireless community, NewMesh, in partnership with other local non-profit media & community groups. The project aims to provide access to free online services such as streaming media for diverse community groups and addresses identified economic and technical barriers to technology. In developing this project the Octapod has drawn on its expertise in engaging a broad cross-section of the community including disadvantaged and marginalised groups. It is intended that the TIN radio stream be offered on this platform to expand local community involvement in new media and increase audience reach.
3. Background to the TIN radio project

3.1 The Newcastle City Council’s Youth Venue through its Ninja Radio project has identified the need for a youth-focused radio station within the Newcastle CBD as a key priority for enhancing social inclusion and supporting and promoting youth music and arts projects.

3.2 During 2005 the Octapod Association and Newcastle City Council’s Youth Venue, The Loft collaborated to develop an on-line radio station, TIN (This is Not Radio) also which has also broadcast on special events FM licenses for the TINA festivals. Over one hundred volunteers have been involved in this project in its first year. Monthly project meetings are open to all members of the Newcastle community and allow for discussion and airing of views by presenters, music programmers, technical staff, trainers and producers.

3.3 Project funding for online and special events radio broadcasting has come from the NSW Ministry of Arts, The Foundation for Young Australians, and The Aids Council of NSW. A grant to enable purchase of a 100-watt transmitter has been made available through the Australian Youth Foundation.

3.4 TIN have actively sought out and drawn from the practices of leading youth arts-media participation projects across Australia, including the Student Youth Network Inc. (SYN) in Melbourne and Edge Radio in Hobart.

3.5 Transmitter installation and maintenance has been supported in-kind by a local two-way communications company, and low-cost access to a transmitter site has been negotiated with a local tertiary institution.

3.5 During 2006, TIN has successfully broadcast Youth Week, International Women’s Day, Cultural Stomp and Reconciliation Week on via low-powered FM special events licenses within the Newcastle CBD.

3.6 Low-power transmissions of varying levels (30 watt and 50 watt) transmissions have been clearly received within line-of-sight from the transmitter within the Newcastle LGA and TIN's target audience area of inner-city suburbs.
4. The Local Community Radio Environment

4.1 Recent developments

4.1.1 Due to a perception of an ageing volunteer population and financial pressures, community stations in the Hunter region have aimed towards an older (50+) demographic.

4.1.2 Newcastle's 2NUR, while remaining a General Community station, for example, has playlisted programming between 6am and 8pm weekdays in an 'Easy Listening' format. 2NUR currently has no youth-focused daytime programming, with university students from Newcastle University (the licence holder) programming music from 8-11pm. From 11-1am long-standing specialist music programs operate, with BBC world service after 1am. Weekends are also orientated towards older listeners, with established programming operating during the day, and ethnic broadcasting in the evenings.

4.1.3 The other community broadcast licence holder in Newcastle is Rhema FM, which was successful at the last amendment to the LAP in 1998. Rhema is a Christian station and part of an extended network which also operates in Gosford and many other regional centres. They re-broadcast much of their programming from their headquarters in the USA. This excludes participation by the many local people who hold differing religious views or indeed support a secular society.

4.2 Opportunities for community radio involvement by young people in Newcastle

4.2.1 Initial enquiries to ACMA about the process of application for a community broadcast license have met the response that
   "Unfortunately ACMA is not aware of any available frequencies in Newcastle that could be used for the provision of an additional community radio service."¹

4.2.2 This was explained in telephone conversations with the Licensing Area of the (then) ABA during June 2005 as relating to the fact that Newcastle's LAP is considered to be part of the Sydney & Central Coast section and spectrum availability in these areas is already limited.

4.2.3 ACMA's representative therefore recommended
   "... that you contact one of the existing community stations in Newcastle, in particular the general service 2NUR (02 4921 5555), to ask about becoming a station volunteer or program provider. It is a condition of a community broadcasting licence that stations must encourage community participation in the operations of the service and in the selection and provision of programming."²

4.2.4 To date, our program proposal submitted to 2NUR in September 2005 has not been responded to. Discussions and meetings with the Station Manager

¹ Email from Catherine Prior, ACMA, Subject: TCBL enquiry, Date: 6 October 2005, 2:50:15 PM.
² Email from Catherine Prior, ACMA, Subject: TCBL enquiry, Date: 6 October 2005, 2:50:15 PM.
have indicated that there is a long waiting list for programs, little turn-over of existing presenters, and a general resistance towards the inclusion of programming that does not fit within the existing 'Easy Listening' format.

4.2.5 Moreover, our dealings with 2NUR indicate that there is little or no scope for young-people or otherwise to actively participate in the governance, management or operations of 2NUR.

4.3 Issues Arising

4.3.1 Discussions with the CBAA and Mike Clark, Managing Director of RadSpec have confirmed that there is the possibility of independent investigation into the availability of radio spectrum, which this Explanatory Paper on the Newcastle LAP now confirms.

4.3.2 It is also considered that the continued broadcasting of commercial NBN television on the VHF band is a major barrier to the allocation of a third community licence in Newcastle. NBN was understood to be moving from this band during the 1990s, but this has not happened and further disadvantages the local community's access to spectrum.

4.3.3 Octapod proposes that there is a clear need for an open call into the allocation of a third community license, and that any other alternative would exclude Newcastle's young people from making representation for the allocation of a community broadcasting license dedicated to serving the local youth community.
5. Newcastle -- Demographic profile

5.1 Proportion of residents under 25

5.1.1 The outer areas of capital cities and coastal Australia experienced the highest population growth in 2002-03, according to ABS regional population figures released in 2004.3

5.1.2 Newcastle has a higher proportion of young people in the 20-24 age group than the State average.

5.1.3 In 2001 in the Lower Hunter the youth population (15-24 year olds) is relatively evenly spread over the five LGAs. Proportionally, the highest concentration of this group was in Newcastle (15 per cent of the population) and the lowest in Port Stephens (11 per cent).4

5.2 Unemployment

5.2.1 While Newcastle's overall unemployment rate has improved since the 1980s, when it was several points higher than the national average, young people in particular suffer from limited work opportunities on leaving secondary and tertiary education in the Hunter, and often have to leave the area to find full-time work in their chosen fields.

5.2.2 During 2004, youth unemployment in Newcastle was measured as the highest in New South Wales, with nearly one in three teenagers looking for full-time work.5 ABS data for the 12 months ending November 2004 showed that youth unemployment in Newcastle increased from 27.9 per cent in November 2003, reaching 30.6 per cent in November 2004 – 9 points above the NSW average.

5.2.3 Further, in August 2004, the ABS estimated that 9% of unemployed teenagers were long-term unemployed, that is, they had been unemployed for more than a year. The proportion of unemployed teenagers who were not in full-time study, and who were long-term unemployed was 13%. This was considerably higher than the proportion of unemployed teenagers who were in full-time study, and were long-term unemployed (7%).

5.3 Underemployment

5.3.1 Data compiled by the Centre for Full-Employment and Equity (CoFEE) at the University of Newcastle has estimated that official unemployment statistics under-represent the number of persons who are able to work more hours per week by an average of fifty percent.6 This is borne out by other sources which indicate that the unemployment rate reflects a deeper problem of underemployment for young Australians. For example in August 2004, the

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ABS estimated that of all Australians aged between 15-24 working part-time and not in full-time study, nearly two in three people (58%) wanted more hours of work and were available to work more hours. The ABS suggests that there is considerable underemployment among young part-time workers who are not studying full-time.  

5.3.2 In conclusion, there is a need for services in the non-government sector to provide opportunities and skill-development for under-employed local people to increase their chances of finding full employment, and to complement existing training and skill development programs in the tertiary sector. Media and cultural projects such as those facilitated by Octapod give highly-needed skills and experience to local young people. Anecdotal evidence from similar projects across Australia supports the theory that this creates pathways to full-employment.

7 'Young People At Risk In The Transition From Education To Work' in 4102.0 - Australian Social Trends, 2005 Latest ISSUE Released at 11:30 AM (CANBERRA TIME) 12/07/2005.
Newcastle in the context of existing Community Radio Broadcasters Australia-wide (see tables attached)

6.1 Appendix A, "Newcastle & comparison with similar population areas".

6.1.1 This table demonstrates that as a regional centre, Newcastle is significantly disadvantaged in terms of community radio licensing when compared with regional centres of a similar population size in NSW.

6.1.2 For example, Wollongong, with about half of the Newcastle population base according to ACMA’s LAP, has two community stations, and Gosford has four.

6.2 Appendix B, "Comparison of Community License Holders in State Capitals of a similar size (Canberra & Hobart)"

6.2.1 This data demonstrates that Newcastle is also disadvantaged when compared with other state capitals of a comparable population size. For example, Newcastle has only two community stations in comparison to Hobart, which has four.

6.3 Appendix C, "Current Community Licenses (Youth) National"

6.3.1 This table demonstrates that there is already considered to be a need for Youth stations in the Gold Coast and Hobart, population centres of a similar size to Newcastle.
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<th>Licence</th>
<th>Start Date</th>
<th>End Date</th>
<th>Frequency</th>
<th>Power</th>
<th>ENGAGEMENT</th>
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<td>12/31/2022</td>
<td>88.5 MHz</td>
<td>10 kW</td>
<td>Community</td>
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<td>1/1/2023</td>
<td>12/31/2023</td>
<td>91.5 MHz</td>
<td>5 kW</td>
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<td>3 kW</td>
<td>Community</td>
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<td>12/31/2025</td>
<td>90.5 MHz</td>
<td>7 kW</td>
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*The above table represents a sample of the data contained in the document.*
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<th>Population</th>
<th>Committed</th>
<th>Community</th>
<th>Commenced</th>
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<td>1234567</td>
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APPENDIX B: Comparison of Community Licence Holders in State Capitals of a similar size
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<th>State</th>
<th>Call Sign</th>
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<td>Queensland Radio Foundation</td>
<td>1QC</td>
<td>1170047786</td>
<td>1170047786</td>
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</tbody>
</table>
By email: lapvariation@acma.gov.au

By mail: Draft LAP – NSW Community Radio
ACMA PO Box 78 BELCONNEN ACT 2616

By fax: (02) 6253 3277.

RE: Variation to LAP for NSW Community Radio
File Reference 2006/823

Dear ACMA

I am writing to express my support for TiIN radio and to request ACMA to call for applications for a third community radio license in Newcastle.

The TiIN radio project has demonstrated that there is a need for a local station that is a place where people from many different backgrounds can communicate about issues facing the local community. It provides a unique opportunity for sharing music, culture and dialogue. TiIN is also important nationally in the ways that it has been able to build on the established and vibrant networks that are part of the Octapod and the This is not Art Festival.

TiIN Radio is a vital resource for the Hunter region particularly because of the opportunity it provides for local young people to discuss important matters in an open public forum, receive training and build links with others facing similar issues. I fully support the station as it continues to grow, and I look forward to hearing that ACMA has decided to properly advertise and investigate the options for use of the 100.5fm frequency in Newcastle.

Sincerely,

Signed: Helene Fox
Name: Helene Fox
Address: 201 23 Curlew Street
Buckle NSW 2256
Organisation: Helene Fox Publicity
Date: 2/10/06

TiIN Radio Supporter