



Project Manager, Radio Investigation 2009
Investigations Section
Australian Communications and Media Authority
PO Box Q500, Queen Victoria Building NSW 1230

Monday 28 September 2009

Dear Sir/Madam

ACMA Investigation – Hosted Live Entertainment Radio Programs

Rebel Media (Rebel) are operators of regional commercial radio services 4BRZ (The Breeze) and 4RBL (Rebel FM).

We support the submission made by Commercial Radio Australia (CRA). Rebel adheres to the Commercial Radio Codes of Practice (the codes).

Since our stations commenced service, there has not been a listener complaint that falls within the scope of the ACMA investigation. With the exception of news bulletins and emergencies, all our programming is either broadcast via 10 second digital broadcast delay or is pre-recorded.

We see no reason for any further tightening of regulations industry wide, particularly if it will further increase the regulatory workload or compliance costs for smaller regional commercial radio licencees.

In our regional licence area there are an increasing number of pseudo-commercial formatted community radio stations that are very lightly regulated, and utilise volunteers to provide more live hosted radio programs than we do. Those stations are free to provide a similar style of commercial mainstream programming and generate a similar income stream to commercial stations, so we don't see why they should be exempt from the ACMA reporting and content requirements that apply to the commercial sector.

In our view the additional regulation that has been placed solely on the commercial sector in the past couple of years has achieved nothing other to divert limited station resources away from programming, and divert limited ACMA resources away from clearing the ACMA three year planning backlog of FM spectrum assignments that are restricting our ability to properly serve our licence area.

We field substantially more listener complaints about signal reception issues than we field complaints about our programming.

The evidence is that the codes are generally working well. Greater regulation is the last thing we need. Rebel strongly urge the ACMA not to impose further industry wide regulation and compliance costs onto regional commercial radio stations.

Regards

A handwritten signature in black ink, appearing to read 'Aaron Jowitt', written over a white background.

Aaron Jowitt
Director