

ACMA five-year spectrum outlook 2025-30 and 2025-26 work program

CBAA comments on draft for consultation

April 2025

1. Introduction

- 1.1 The Community Broadcasting Association of Australia (CBAA) welcomes the opportunity to provide comments on the consultation draft of the ACMA Five-Year Spectrum Outlook 2025-30 with a specific focus on the work program for 2025-26.
- 1.2 The Community Broadcasting Association of Australia is the peak body for community broadcasting licensees in Australia, with radio and television members.
- 1.3 More than 450 not-for-profit community radio broadcasters deliver over 500 services on AM, FM and DAB+ digital radio across Australia.
- 1.4 Community radio broadcasters play a vital role in connecting and informing communities - providing services with significant public benefit, including a diverse mix of social and cultural interests, specialist talks and music, and high levels of local content and presentation. Community broadcasting is recognised for its role in emergency resilience, and as a platform for original Australian content and music.
- 1.5 Community interests addressed include Indigenous services, radio reading services for the print disability community, youth, seniors, LGBTQIA+, religious and faith-based services, ethnic language and multicultural radio, specialist music, educational and general geographic services.
- 1.6 In metropolitan areas there is a greater number of specific community interest services. In regional and rural communities, community radio stations more frequently provide diverse programming covering broad community interests under a general geographic licence, with a high number of Indigenous services in remote locations.
- 1.7 Community analogue radio stations operate overwhelmingly in the VHF-FM band, and in the majority of regional towns and cities across Australia, with approximately 75% located in regional and remote areas, and 25% across metropolitan locations.
- 1.8 Community DAB+ digital radio services operate under long-term licensing arrangements in Sydney, Melbourne, Brisbane, Adelaide, Perth, with services now also operating in Canberra, Hobart, Darwin and the Gold Coast. A total of 54 licensees are currently providing over 64 free-to-air community digital radio services to listeners.
- 1.9 Community digital radio services for the Gold Coast area were implemented in 2022, and further development of metropolitan services and implementation in additional regional areas is now being addressed.
- 1.10 Trials of DAB+ digital radio services are operating in Launceston, Northern Tasmania, alongside the intention to introduce permanent DAB+ digital radio services in the near term.
- 1.11 Trials of targeted coverage DAB+ digital radio services are operating in Sydney. The trials are to explore options for digital radio multiplex transmission arrangements, alongside the intention to address current wide-coverage capacity and service limitations, and pathways for community radio services not yet on-air using free-to-air DAB+ digital radio delivery.
- 1.12 Community television services operate in Melbourne and Adelaide, with access to broadcast band spectrum for delivery of free-to-air digital television services being previously subject to renewal under repeated consecutive short-term arrangements requiring regular legislative attention, and now at the discretion of the ACMA.
- 1.13 Guiding principles underpin community broadcasting Codes of Practice and the contribution of community services to media diversity and social inclusion.
- 1.14 Community broadcasting licences are issued pursuant to and in promotion of the objects of the Broadcasting Services Act 1992 (BSA).

2. Scope of comments

- 2.1 As in previous years, the CBAA comments are purposefully brief, and focus primarily on optimising established planning frameworks and broadcasting, and specifically in regard to the immediate-term planning priorities for spectrum planning and licensing.
- 2.2 The CBAA appreciates that the ACMA has limited resources, and the Five-Year Spectrum Outlook (FYSO), updated on a yearly basis, provides a framework to plan resource commitments and requirements, both in regard to telecommunications and general radiocommunications use cases, and in relation to free-to-air radio and television broadcast spectrum and service planning.
- 2.3 The draft proposed optimisation activities for 2025-26 are listed on Pages 45-46 of the ACMA Consultation Paper, with further elaboration in regard to broadcasting, radio and television, on Pages 46-48.

3. Broadcasting - radio planning priorities

Perth and Remote WA area radio planning

- 3.1 The draft ACMA 2025-26 work program proposes to finalise variations to the Perth and Remote Western Australia Radio Licence Area Plans (LAPs) within 2025-26. Consultation on these LAPs was flagged for Q4 2024 in the ACMA 2024-25 work program.
- 3.2 The timeframe for the Perth Radio LAP is relevant. There are consequential impacts to several community broadcasters as a result of ABC requests, as well as other requests of long-standing made directly by community broadcasting licensees.
- 3.3 Significant planning and preparatory implementation works have been undertaken by a number of broadcasters, anticipating outcomes from Perth radio planning, and ahead of the finalised Perth Radio LAP variation.
- 3.4 While that may assist in expediting outcomes for the ABC, there is an associated element of risk insofar as the outcomes of consultation on the Perth Radio LAP variation cannot yet be fully known.
- 3.5 When made available for consultation, it is possible that some stakeholders take the view that the proposed Perth Radio LAP variation is not comprehensive, nor taking into account all the legitimate issues in and related to Perth radio planning.
- 3.6 The absence of 6RPH (Vision Australia Radio, Perth) is a case in point.
- 3.7 6RPH is an AM broadcaster yet has not been included in the ACMA preliminary considerations regarding analogue AM and radio planning in Perth as published to date.
- 3.8 6RPH operates a DAB+ digital radio service with simulcast of content of its analogue AM radio service, as well as an additional service with alternative 6RPH related content. Both services broadcast on DAB+ digital radio across metropolitan Perth.
- 3.9 As 6RPH already broadcasts on both AM and DAB+ in Perth, future options for 6RPH are relevant to Perth radio planning, and may factor into the process and proposed finalisation of the Perth Radio LAP variation.
- 3.10 The CBAA requests that, in formulating the Perth Radio LAP variation to address several specific AM and FM radio delivery issues, that the ACMA address:
 - demand to add further DAB+ digital radio service outcomes and capacity across Perth, including to neighbouring radio licence areas, including Mandurah and Bunbury; and
 - provide permanence to a number of long-term but otherwise still temporary community broadcasting licensees, as well as to resolve digital radio deeming across those areas. See further comments below.

Melbourne radio planning

- 3.11 In the draft 2024-29 FYSO 2024-25 work program¹, the ACMA proposed to consult on variations to the Melbourne Radio LAP in Q2 2025. This was absent in the finalised 2024-29 FYSO 2024-25 work program.

There is no variation to the Melbourne Radio LAP proposed nor specifically mentioned in the draft 2025-30 FYSO 2025-26 work program.

¹ March 2024, Five Year Spectrum Outlook, Draft for consultation, Page 81
<https://www.acma.gov.au/consultations/2024-03/2024-29-draft-five-year-spectrum-outlook>

Radio LAP variation for AM to FM conversion

- 3.12 The ACMA proposes to consult on possible variations in a number of radio licence areas to facilitate AM to FM conversions, and this has now been expanded to include both solus and competitive commercial radio licence areas.
- Solus licence areas may include:
Lismore, Lithgow, Inverell, Moree, Gunnedah, Young and Parkes.
 - Competitive licence areas may include:
Albury, Atherton, Bunbury, Canberra, Coffs Harbour, Dubbo, Kempsey, Maryborough (Bendigo), Maryborough (Qld), Murwillumbah, Muswellbrook, Newcastle, Orange, Sale, Toowoomba and Warragul.
- 3.13 The ACMA notes that proceeding with developing and consulting on each Radio LAP variation depends upon the relevant licensees making timely and strategic business decisions on available implementation options.
- 3.14 The draft 2025-30 FYSO and 2025-26 work program lists a set of activities indicating a strong focus of broadcasting policy and engineering resources on conversion of commercial AM broadcasters to FM, and the ACMA has established a Broadcasting Technical Liaison Group to discuss AM to FM conversion in regional licence areas.
- 3.15 The majority of community broadcasters in regional areas already broadcast on VHF-FM, and have done so since inception, some for 40 - 50 years.
- 3.16 Whilst the CBAA does not question the right of any regional commercial AM broadcaster to decide it might wish to convert to FM broadcasting, the CBAA is concerned that ACMA priorities and broadcast policy and engineering resources ought not focus on this process to the detriment of other forward-facing radio broadcast outcomes for listeners.
- 3.17 The ACMA gives effect to AM to FM conversions through variations in Radio Licence Area Plans (LAPs). Radio LAP variations are made in accordance with the process and criteria set out in the Broadcasting Services Act 1992.
- 3.18 The legislated Planning Criteria at Section 23 are relevant, as are, in turn, the Objectives of the Act, as set out in Section 3. Community broadcasting licenses are issued and provide for broadcasting service outcomes pursuant to the objects of the Act.
- 3.19 Importantly, at a regulatory and policy level, the CBAA underlines Principle 3 of the ACMA *Principles for planning AM to FM conversions in regional licence areas*² which makes plain there will be no re-planning of existing services unless agreed between affected broadcasters.
- 3.20 The CBAA is aware that brokering agreement with community broadcasters may be a relevant factor and, in some cases identified as a necessary prerequisite for planning outcomes for commercial or converting broadcasters in a number of radio licence areas.
- 3.21 The CBAA is concerned that where an impact is identified by a converting broadcaster on another broadcaster, particularly to a community broadcaster, and where agreement of that affected broadcaster cannot be reached, that the ACMA undertake an independent policy and engineering analysis to test for other solutions, rather than relying only upon the policy and engineering assessments of a converting broadcaster.
- 3.22 Other solutions should include identifying alternative options for the converting broadcaster, and assessing each alternative in terms of cost, coverage, broadcast service and policy objectives, and spectrum efficiency. This would assist in obtaining best outcomes for listeners and encourage a stable radio broadcasting environment.
- 3.23 Other solutions may include use of free-to-air DAB+ digital radio as part of the solution set, noting that DAB+ provides genuine listener benefits in terms of audio and reception quality, and genuine service diversity through the opportunity to add many extra and multiple services for all broadcasters, not just a singular FM service with content that replicates and/or replaces the existing converting or commercial AM service.

² September 2022, Principles for planning AM to FM conversions in regional licence areas, ACMA, Principle 3.

Priority to consult and make DRCP

- 3.24 The draft 2025-30 FYSO 2025-26 work program at Page 45 sets out a priority for the ACMA to:
- consult on DRCPs for the licence areas where broadcasters have committed to rollout digital radio, with timing being driven by demand from broadcasters.
- 3.25 The CBAA endorses and supports that priority.
- 3.26 Page 46 has text related to that priority, but narrows the focus to commercial licensees and national broadcasters, omitting community broadcasters. Omitting community broadcasters risks marginalising the sector and should be corrected.
- 3.27 The CBAA requests that the text on Page 46 be generalised and made consistent with Page 45, so that the text on Page 46 would then read:
- making digital radio channel plans for regional DAB+ for licence areas where a broadcaster has committed to rollout digital radio.
- 3.28 The CBAA considers the omission of community broadcasting from this priority setting on Page 46 to be an error that should be corrected.
- 3.29 It is not appropriate that the ACMA accord priority to commercial licensees or national broadcasters, yet not give that same priority to community broadcasters in this matter.
- 3.30 Community broadcasters are entitled to expect the ACMA to treat a commitment from the community broadcasting sector to roll out digital radio in an area with equal regard as it would a commitment from a commercial licensee or national broadcaster.
- 3.31 Where a community radio licensee, or a collective of community radio licensees, make a commitment to rollout digital radio, there is no basis for the ACMA to pre-emptively determine that commitment is not possible to fulfill.
- 3.32 There are a number of regional locations where the community broadcasting licensees and sector have identified and negotiated cost-effective arrangements to bring about delivery of digital radio services.
- 3.33 The CBAA understands that in some cases the corporate and network priorities or business situation of a commercial broadcasting licensee may mean it is not currently motivated or able to bring the benefits of digital radio to listeners in a given area. That is a decision for each commercial broadcasting licensee.
- 3.34 While it has been the pattern in metropolitan and regional areas to date for commercial broadcasters to participate in the rollout of digital radio, a decision by a commercial broadcasting licensee is not and should not be taken as the determinant of whether community broadcasters in an area can rollout and implement digital radio services.
- 3.35 The situation of community radio broadcasters is often usually and quite different to commercial broadcasters, especially in regional areas.
- 3.36 Digital radio implementation represents a highly cost-effective option to deliver free-to-air radio broadcast services with much improved audio and reception quality, and a way to unblock often tightly-wound block program schedules so as to deliver an increased diversity of services to listeners. In effect similar to the diversity listeners might expect and enjoy in metropolitan areas.
- 3.37 The ACMA should not block or delay improvements that benefit listeners, nor frustrate a legitimate commitment made by the community broadcaster/s to rollout out digital radio services.
- 3.38 Another factor is the national broadcasters, where there can be, and are, cost and other synergies and efficiencies when digital radio transmission facilities are shared.
- 3.39 Whether or not a commercial radio licensee participates in the initial implementation, these synergies and efficiencies can bring benefit for the national broadcasters and the community broadcasters, and listeners.
- 3.40 The CBAA is resolute on this matter, and without needing to transact further in the context of comments on the FYSO, requests that the matter at least be neutralised in the FYSO work program by, as noted above, editing the text on Page 46 to match the text on Page 45, and so read:
- making digital radio channel plans for regional DAB+ for licence areas where a broadcaster has committed to rollout digital radio.

Radio LAP variation to trigger publication of DRCP

- 3.41 Consistent with previous correspondence and submissions, including in relation to AM to FM conversion planning principles in regional areas, the CBAA requests that the ACMA adopt a policy that:
- where the ACMA proceeds to develop and consult on a Radio LAP variation, and, in particular where that is to effect regional AM to FM conversion, that, if not already published, the ACMA also consult and publish the relevant Digital Radio Channel Plan (DRCP), with a view to declaring a Foundation Licence.
- 3.42 The ACMA already has the basis for each relevant DRCP in final draft included within the national digital radio allotment plan: part of the output and work of the industry-based Digital Radio Planning Committee, chaired by the ACMA.³
- 3.43 The ACMA and radio industry stakeholders invested considerable time and resources over several years to document and allot digital radio channel allocations against each radio licence area. The result of that work is publicly available, documented and published on the ACMA website.⁴

Specific DRCP consultation locations during 2025-26

- 3.44 There is demand for free-to-air DAB+ digital radio services in a number of locations, with demand driven by community broadcasters. The CBAA has arrangements to facilitate and support the implementation, delivery and operation of digital radio services provided by community radio licensees.
- 3.45 To address this demand, the CBAA requests that the ACMA anticipate the following as specific locations and priorities for action, including for DRCP consultation, with timelines across 2025-26:
- Northern Tasmania, Launceston
 - Gosford
 - Newcastle
 - Wollongong
 - Katoomba
 - Campbelltown
 - Cairns
 - Coffs Harbour
- 3.46 As noted at 3.42, the ACMA already has the basis for each relevant DRCP in final draft included with the national digital radio allotment plan, part of the output and work of the industry-based Digital Radio Planning Committee, chaired by the ACMA.

Deeming for community broadcasting licence areas

- 3.47 The CBAA requests the ACMA prioritise deeming of community radio licence areas with demand driven by community broadcasters, and especially where digital radio services are already on-air in trials, or may be anticipated in the context of AM to FM conversions.
- 3.48 In the case of Launceston, for example, it would be procedural for the ACMA to quickly make a determination using its powers under the Broadcasting Services Act Section 8AD(3) to deem two relevant community radio licence areas to be the same as the commercial radio licence area for the purposes of digital radio.
- 3.49 The population overlap of two community radio licence areas - Launceston RA2 and Hobart RA4 - with the commercial radio licence area - Launceston RA1 - is all but total, at over 96%.
- 3.50 Given the near total population overlap, this particular determination can and should be considered procedural. If any further consultation was required, it should be expedited.

³ <https://www.acma.gov.au/digital-radio-planning-committee>

⁴ <https://www.acma.gov.au/digital-radio-regional-allotment-plans>

Brisbane, Gold Coast and neighbouring areas

- 3.51 During 2021-22 the ACMA published decisions to vary the Brisbane Digital Radio Channel Plan (DRCP). The ACMA also finalised the Gold Coast DRCP and issued a corresponding Foundation Category 1 license.
- 3.52 The changes for improved digital radio coverage across Brisbane have been welcome.
- 3.53 The implementation of community and commercial digital radio services on the Gold Coast occurred during 2022, with the national broadcaster implementation in 2024.
- 3.54 The CBAA requests that radio licence areas neighbouring both Brisbane and the Gold Coast be anticipated as priorities for DRCP consultation.
- 3.55 Therefore, and as outlined in previous comments to the ACMA^{5 6}, the CBAA suggests that the ACMA anticipate the following as priorities for DRCP action during 2025-26:
- Murwillumbah and Lismore
 - Nambour

Perth, Mandurah, and neighbouring areas

- 3.56 During 2021 the ACMA published a paper on the potential for re-planning analogue radio services in Perth, following clearance of VHF Band II television in Bunbury.
- 3.57 The CBAA provided comments in response⁷, as did a number of community broadcasting licensees potentially and directly affected.
- 3.58 The ACMA published the outcome of its considerations in September 2022, and the ACMA published a priority during 2024-25 to consult on variations to the Perth Radio LAP to give effect to ABC AM to FM conversions, and other requests.
- 3.59 The ACMA Perth Radio LAP consultation is yet to commence, and the timing to finalise is now slated for 2025-26.
- 3.60 Wide coverage free-to-air DAB+ digital radio services already operate across Perth, alongside AM and FM, and so provide an alternative option to AM in the metropolitan areas. Facilitating extension of DAB+ to include the neighbouring areas is relevant.
- 3.61 That said, there are current constraints on the number of community digital radio services able to be delivered within the limited amount of capacity reserved or available.
- 3.62 This is especially acute in Perth⁸ where there is only the one Foundation Category 1 digital radio multiplex in operation, compared to two in Sydney, Melbourne and Brisbane.
- 3.63 The CBAA has identified options and finalised arrangements to support the implementation and operation of an additional digital radio multiplex in Perth, which also has relevance to the neighbouring areas, including Mandurah and Bunbury.
- 3.64 In concert with Perth radio planning, the CBAA requests that the ACMA add the following priorities during 2025-26:
- Perth: assess spectrum options to add a DAB+ digital radio multiplex
 - Mandurah: assess options for deeming, as, without deeming, no community radio services are eligible to take up existing digital radio capacity, which represents inefficient use of spectrum.
 - Bunbury, Collie, Harvey, Margaret River: assess options for deeming, and permanent licensing for long-term temporary community broadcasters.

⁵ October 2020, CBAA comments in regard to the September 2020 ACMA Consultation to vary the DRCP covering Brisbane and add the Gold Coast.

August 2021, further CBAA comments in regard to second ACMA consultation, July 2021.

⁶ August 2020, CBAA comments in regard to the ACMA Consultation on Expansion of digital radio to regional Australia, Proposed principles for licence area deeming.

⁷ June 2021, CBAA comments on the ACMA options paper, FM broadcasting services band in the Perth RA1 licence area. Published on ACMA website, August 2021.

⁸ As well as Adelaide.

Adelaide radio planning

- 3.65 As with Perth, in Adelaide there are constraints on the number of community digital radio services able to be delivered within the limited amount of capacity available.
- 3.66 There is clear demand in Adelaide for further community digital radio services.
- 3.67 The demand includes a long-standing request to the ACMA to address the absence of a First Nations Indigenous radio service in Adelaide.
- 3.68 There are full-time Indigenous digital radio services on-air in all the capital cities, except for Adelaide, Canberra and Hobart.
- 3.69 The Gold Coast, being a major population centre with DAB+ digital radio on-air, is also identified as a location without a full-time Indigenous radio service.
- 3.70 There is digital radio multiplex capacity available for additional community broadcasting service purposes in some of these locations.
- 3.71 The CBAA has also identified options and finalised arrangements to support the implementation and operation of an additional digital radio multiplex in Adelaide.
- 3.72 In Q1 2023, the CBAA provided the ACMA with initial details of these arrangements and a commitment to implement an additional digital radio multiplex in Adelaide.
- 3.73 The CBAA requests that the ACMA add the following priorities during 2025-26:
 - Adelaide: assess spectrum options to add a DAB+ digital radio multiplex.

Northern Tasmania, Launceston, supporting technology trials

- 3.74 The ACMA has a current radio broadcasting planning priority to support trials of new broadcasting technology.
- 3.75 Regional trials relating to Digital Radio Mondiale (DRM) technology were conducted in 2022. DRM has an uncertain and long implementation time-frame in terms of consumer receiver availability, particularly in vehicles.
- 3.76 In Q2 2023, with more immediate service and listener outcomes in mind, the CBAA provided the ACMA details of arrangements and a commitment in respect of implementing a digital radio multiplex in Northern Tasmania: Launceston, across one limited coverage site and one main site.
- 3.77 The trial commenced on-air in Q3 2023 using the limited coverage site. The trial has since been extended.
- 3.78 The Launceston trial is in collaboration with the ABC. There are two separate trial licences and two separate multiplexes. An intention of this collaboration has been to share costs for both parties, and ensure efficient use of resources.
- 3.79 The ACMA published an initial DRCP for Launceston in November 2023, with a minor amendment in December 2023.
- 3.80 Both the ABC and the community sector made clear there is broadcaster demand to implement DAB+ digital radio on a permanently licensed basis in Launceston, Northern Tasmania as an immediate priority.
- 3.81 Submissions were made to the ACMA by or on behalf of the ABC, commercial and community broadcasters as part of a consultation on the Launceston DRCP.
- 3.82 The ABC has obtained a long-term Category 3 licence for Launceston which, at this stage, is based on operation of the infrastructure and transmission site used in the trials.
- 3.83 The ACMA has not yet taken steps to declare a Foundation Category 1 licence, nor addressed deeming of community broadcasters, necessary in Launceston.
- 3.84 The CBAA requests that the ACMA add the following priority for immediate action, and for finalisation in the 2025-26 work programs, preferably by or during Q3 2025:
 - Northern Tasmania, Launceston:
 - Assess deeming of community broadcaster licence areas as an immediate priority.

Sydney, supporting technology trials

- 3.85 In Q1 2023, the CBAA provided the ACMA details of arrangements and a commitment in respect of adding an additional DAB+ digital radio multiplex in Sydney as a trial.
- 3.86 The Sydney trial involves low-power re-use of an adjacent licence area spectrum channel allocation overlaid upon the current Sydney DAB+ digital radio allocations.
- 3.87 The Sydney trial commenced on-air status late in Q2 2024.
- 3.88 The research objectives of the trial are extensive, and include:
- to demonstrate operation of targeted-coverage digital radio facilities as an overlay on existing wide-coverage transmission facilities;
 - exploration of the coverage and impacts of alternate transmission parameters, and antenna polarisation options;
 - impacts on in-car reception;
 - general coverage and listening patterns;
 - road tunnel coverage, and in-car listening patterns;
 - test bed for next generation multiplexing systems and facilities;
 - test bed for receiver behaviour, including in-car receivers, with varying numbers of services and service configurations.
 - Options to address current wide-coverage capacity and service limitations, and pathways for community radio services currently not yet on-air using free-to-air DAB+ digital radio delivery.
- 3.89 The CBAA is pleased that the ACMA has an ongoing priority to support trials of new broadcasting technology, specifically referencing these DAB+ trials and looks forward to ongoing ACMA support as the trial moves forward to the next stages of research.

4. Broadcasting – television planning priorities

- 4.1 In October 2024 the Minister announced that the Australian Government would work with industry on a plan to secure the future of free-to-air television, which may include exploring the possibility of releasing further television BSB spectrum for other purposes, a second “digital dividend”.
- 4.2 The Minister indicated the Department to release a discussion paper to support engagement with interested parties in early 2025.
- 4.3 The CBAA participates in the Future of Broadcasting Working Group, which intends to provide a forum to consider possible future Government policy decisions that may require replanning of television channels and revised licensing frameworks.
- 4.4 Some time ago, the CBAA made detailed and extensive comments in relation to the Media Reform Green Paper, relating to both interim and ongoing provision of free-to air community television and radio services within both the existing and a restacked digital television channel planning and licensing framework.⁹
- 4.5 The CBAA highlighted that the spectrum used for provision of existing community television services in Adelaide and Melbourne was not identified nor able to be used for any alternative purpose in the near term.
- 4.6 Community television services have been previously subject to license renewal under repeated consecutive short-term arrangements requiring regular legislative attention, and until Q1 2024, legislation had the licenses falling due for extension in June 2024.
- 4.7 As a result of legislative changes, the continuation of the existing community television services is ongoing at the discretion of the ACMA until there is an alternative requirement for spectrum.
- 4.8 Community television licensees and services deserve certainty of their legitimate and ongoing status as providers of free-to-air television and broadcasting services.
- 4.9 The CBAA has outlined options relevant to possible new shared multiplex arrangements, demonstrating options that provide for the inclusion of community radio and television services delivered within shared digital television multiplex arrangements.
- 4.10 As the peak body representing free-to-air licenced radio and television broadcasting services, the CBAA expects to continue to be consulted and actively engaged in the ACMA work relating to licensing and channel options, both in the lead-up and subsequent to any restack objectives being set by the Government.

5. Broadcasting – future delivery

- 5.1 The CBAA remains keen to engage further with the ACMA on all options in regard to the future delivery of free-to-air radio and television.
- 5.2 The CBAA reiterates that free-to-air broadcasting has core characteristics that set it apart from other delivery options, and that would require significant legislative and regulatory intervention for other delivery options to emulate.
- 5.3 The free-to-air broadcast model:
 - does not require the user to pay - including for data;
 - is highly spectrum efficient, scales to many simultaneous users; and
 - enables the public to receive services on commonly available equipment, with no ongoing payment required for use, and no sign-in required.
- 5.4 As digitisation of media continues, these core characteristics are critical, especially where other delivery methods require one-to-one connectivity with its attendant costs, and increased risks around:
 - listener (or viewer) security and privacy;
 - provision of listener (or viewer) data for third-party or gatekeeper use; and
 - listener (or viewer) commodification and/or targeted marketing.

⁹ May 2021, CBAA comments on the Media Reform Green Paper – Modernising television regulation in Australia – circulated by the Department of Infrastructure, Transport, Regional Development & Communications, November 2020.
<https://www.infrastructure.gov.au/sites/default/files/documents/mrgp-community-broadcasting-association-of-australia.pdf>