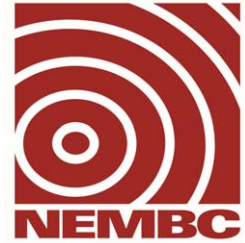


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8 December 2009

Dear Mr Wilding

Thank you for the opportunity to make a submission to ACMA in relation to the Discussion Paper, "New RIBS Radio Licensing Proposal". The National Ethnic and Multicultural Broadcasting Council (NEMBC) has spoken to members of AICA and would like to present the following points in relation to the proposal.

1) Simplifying the process. It seems like one of the main reasons for introducing the narrowcasting licence is to simplify the process of re-newel. While the introduction of the narrowcast model may do this to some degree, for particular radio stations in terms of filling out forms, the NEMBC believes that it adds more complications for the Aboriginal broadcasting sector and the Aboriginal community in general. The introduction of narrowcasting will have some RIBS stations on TCBL and others on narrowcasts licences therefore creating a duality and potential misunderstanding between stations and within the sector.

The NEMBC believes it would be more productive if ACMA would simplify the administrative process for licence renewal or application for RIB stations. There is not a lot of competition for bandwidth and the process of renewal should therefore be simple.

2) Community Broadcasting Ethos. The NEMBC believes that the narrowcast model creates a different system that takes away from the community broadcasting ethos. There is already a comprehensive codes of practise developed for the community sector and there is one being developed specifically for Aboriginal broadcasting. Any new narrowcast licences would not fit under the specially designed community broadcasting codes of practice

A potential problem with this proposal is that broadcasters under a narrowcast licence may no longer fit the requirements to receive funding under the CBF because the requirements of the CBF are closely linked to the Community Radio Broadcasting Codes of Practice.

3) Ownership and Representation: What is of most concern is the potential loss of representation and further division within the sector. A narrowcast licence would

come under the ANRA, which would create a new organisation in the sector. AICA and IRCA would then have to deal with two organisations, ANRA and CBAA. There is no history or relationship with ANRA while there is a strong relationship within the sector between the CBAA, the NEMBC, CBF and other sector bodies. AICA will also have to continue to deal with CBBA and the new organisation ANRA as well as its own department DEWHA and maintain communication with the DCBDE.

4) Divide or Unify: The introduction of a new narrowcast model will further divide Aboriginal broadcasting into segments rather than trying to unite, support and assist existing services. AICA and IRCA would also be under more pressure to provide assistance with the new proposed narrowcast model while maintaining its support with the TCBL/CBLs.

As you may know, community organisation's resources are already pushed to the limit in providing assistance and advice. Finding ways to unify and simplify rather than divide Aboriginal broadcasting will be more beneficial to the sector, to individual stations and broadcasters.

The NEMBC believes that the proposed model as mentioned in the Discussion Paper to change RIBS from TCBLs to narrowcast licences would not be productive or beneficial. The NEMBC believes that a process of dialogue with AICA and IRCA will assist in developing a more simple process for TCBL renewals.

Thank you again for the opportunity to present this submission.

Regards



Russell Anderson
Executive and Policy Officer

cc. via email to: ribs@acma.gov.au