Australian Government

Department of Communications, Information Technology and the Arts

INDIGENOUS TELEVISION REVIEW REPORT

Report of the review into the viability of establishing an Indigenous television service and the regulatory arrangements that should apply to the digital transmission of such a service using spectrum in the broadcasting services bands

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Cover image: A class in progress at Yipirinya School, Alice Springs, Northern Territory. Photo: Will Caddy, NT

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Introduction

Introduction

This is a report of a statutory review of the viability of creating an Indigenous television broadcasting service and the regulatory arrangements that should apply to the digital transmission of such a service.

Clause 60(1) of Schedule 4 to the *Broadcasting Services Act 1992* (BSA) provides that the Minister for Communications, Information Technology and the Arts must cause reviews of certain matters to be conducted before 1 January 2005. Clause 60(2) provides that the Minister must cause a report of the reviews of each matter to be prepared and clause 60(3) provides that copies of the reports are to be laid before each House of the Parliament within 15 sitting days of that House after the completion of the preparation of the report.

Clause 60(1)(k) provides for a review of 'the viability of creating an Indigenous television broadcasting service and the regulatory arrangements that should apply to the digital transmission of such a service using spectrum in the broadcasting services bands'.

A discussion paper for the review was released by the Minister on 10 May 2004. The paper outlined the background to the review and raised a number of issues for consideration:

- What should the objectives of an Indigenous television service be?
- Who should be the target audience of an Indigenous television service?
- What should the service coverage of an Indigenous television service be?
- How best can an Indigenous television service's objectives be met?
- If an Indigenous television broadcaster is established, how should that broadcasting service be transmitted?
- If transmission is achieved by carriage over an existing broadcaster's network, what should the nature of any carriage obligation be?
- How much transmission capacity should the carrier be required to make available?
- Alternatively, should the service be primarily a source of programming that could be made available to any interested broadcaster? If so, should it produce that programming itself or commission it from external production houses?
- What would be an appropriate licensing regime for an Indigenous television service?
- Who should control an Indigenous television service?

- If an Indigenous television service were to be carried by an existing national broadcaster, should it be carried by the Australian Broadcasting Corporation (ABC) or the Special Broadcasting Service (SBS)?
- If sponsorship/advertising is permitted on an Indigenous television service, should there be any culturally specific content restrictions?
- In what language should an Indigenous television service broadcast?
- How should an Indigenous television service be funded?

An appendix to the paper discussed a number of factors affecting carriage options for an Indigenous broadcasting television service in digital mode. The public was invited to make submissions to the review on these and any other matters they considered relevant.

Rather than making a formal submission to the review, some people chose to send short, informal emails expressing their support for an Indigenous television service. Almost 400 such emails were received.

Submissions to the review closed on 30 September 2004. Officers from the Department of Communications, Information Technology and the Arts (DCITA) held community consultations on issues raised by the review in capital cities and some regional centres.

In addition to these consultative processes, the Department engaged consultants Gilbert & Tobin Lawyers to provide advice on the likely costs of establishing a number of different models of Indigenous broadcasting service. That report, which forms Part Four of this report, was released on 30 July 2004 to help inform parties preparing submissions to the review.

The review received 49 submissions which have been made publicly available on the Department's website at *www.dcita.gov.au*. A list of submitters is set out in the Appendix of this report. They include key Indigenous stakeholders such as the National Indigenous Television Committee (NITVC); health and legal organisations such as the Victorian Aboriginal Legal Service (VALS) and the Victorian Health Promotion Foundation; statutory authorities such as the Australian Broadcasting Authority (ABA), the ABC and SBS; and private individuals.

Since the review commenced there have been significant changes in the administration of Indigenous affairs in Australia. A Ministerial Taskforce on Indigenous Affairs, chaired by the Minister for Immigration and Multicultural and Indigenous Affairs, has been established and is guiding policy development and resource allocation. It is supported by a Secretaries' Group on Indigenous Affairs and advised by a non-statutory National Indigenous Council.

DCITA has assumed responsibility for delivering a number of programs including broadcasting, arts, languages and culture and sport programs.

This report is set out in four parts. Part One provides a summary of the key discussion points emerging from the community consultations undertaken by the Department and an analysis of written submissions received.

In Part Two of this report there is a discussion of the key issues emerging from the review.

Based on analysis of the submissions and the costings report, the review has identified a number of broad options for an Indigenous television broadcasting service that government could consider. These are set out in Part Three.

Part Four is the Gilbert & Tobin Lawyers consultant's report referred to above.

1

The consultation process

Part One—The consultation process

Submissions

The review received 49 submissions, which have been placed on the Department of Communication, Information Technology and the Arts' website at *www.dcita.gov.au*. Over half of the submissions were from individuals and all bar one supported the establishment of a national Indigenous television service. Twenty-two submissions were received from Indigenous health and legal services, government agencies, national broadcasters and media/film organisations. The main issues raised in these submissions are outlined below.

Public consultation meetings

In addition to the usual practice of calling for public submissions to the review, the Department conducted a series of face-to-face consultations. These took the form of public meetings which were advertised in Indigenous and other community media, as well as the general media. These consultation meetings took place in Adelaide, Alice Springs, Brisbane, Broome, Cairns, Darwin, Melbourne, Perth, Sydney and Townsville in June, July and August of 2004. The meetings were loosely structured around issues in the review discussion paper, although they often went beyond this structure to engage in other matters that the participants felt were important.

Informal Expressions of Support

Between the announcement that the review had commenced on 10 May 2004 and the closing date for submissions on 30 September 2004, the Department received almost 400 emails in support of the establishment of an Indigenous television service. These were much more informal than the 49 submissions and were often very brief, many containing just a sentence or two of support, although some were more substantial. The emails came from every state and territory, from urban and rural areas, and were sent by people in a wide range of occupations including health workers, curators, academics, filmmakers, broadcasters and students. Supporting argument, where included, was wide-ranging, from the potential for Indigenous television to assist with language maintenance and strengthened cultural identity to the desire for 'something decent to watch on television'. Many emails pointed out that there are models for Indigenous television around the world and in particular noted the recent establishment of Maori Television in New Zealand.

1.1 Viability

Submissions

The Australian Parliament incorporated the question of the viability of establishing an Indigenous television service into the terms of this review. The question of viability was a point of contention during many of the consultation meetings.

The NITVC is a group formed by the Australian Indigenous Communications Association (AICA) containing representatives from the Indigenous Remote Communications Association (IRCA), Indigenous Screen Australia (ISA), AICA itself and other industry bodies. The NITVC submission argues that an Indigenous television service can be considered viable in the same way as the ABC or SBS are. The NITVC acknowledges that, like the ABC and SBS, Indigenous television will require Australian Government finance for its establishment, but believes that over time an Indigenous television service has good prospects of raising a portion of its own income.

The Northern Territory Government argues that, while it would be justifiable in the abstract to propose a full free-to-air, digital Indigenous television service from the outset, the capitalisation and operational costs would make it politically unappealing to the Australian public. The Northern Territory Government feels it is important that any Indigenous television service is viable in the sense of it having permanent government funding to the level required.

The ABA notes that one of the key factors which will determine viability is the choice of transmission option. It notes that the capacity of digital spectrum to make available a much greater number of program channels than analog raises the possibility of an existing broadcaster becoming a third party carriage provider for an Indigenous broadcasting service.

Public consultation meetings

Many people who attended the consultation meetings took exception to the word 'viability' in the title of the review. (This reflects the wording of clause 60(1)(k) of Schedule 4 to the *Broadcasting Services Act 1992*, which sets out the parameters of the review.) There was a strong view that any expectation of viability is unreasonable. A Sydney speaker said:

> Indigenous television has been introduced in Wales, Spain, Ireland, Canada and New Zealand for more than 20 years, so we feel on those sorts of terms viability is not really a question. The question is, is the government prepared to properly fund this service? And given the maturity, skills, expertise, creativity and resources, we say, we are ready for Indigenous television. And I think that's our answer to that question.

1.2 The model

Submissions

There was strong support in many submissions for an Indigenous television service to be the third national public broadcaster. The Pacific Film and Television Commission (PFTC) saw the advantages of this model as including ongoing funding from the Australian Government; new facilities and operational equipment to allow full digital roll-out; legislation allowing a majority controlled Indigenous board with some Government appointed members; spectrum made available by legislation; and a marketable, high profile national organisation.

The NITVC submission, too, supports the establishment of a stand-alone Indigenous television service with a statutory basis. The Committee envisages a five-year transitional period during which an open narrowcasting service would be provided alongside the Indigenous Community Television (ICTV) narrowcasting service transmitted by Imparja Television. (Content for ICTV is currently provided by remote Indigenous broadcasting hubs such as PY Media.) The service would supplement ICTV's remote programming focus with its own content, which would be delivered to Imparja Television for transmission.

Ultimately the NITVC proposes that new broadcasting legislation should create a national Indigenous television service with a national allocation of 7MHz of spectrum in the broadcasting services bands. The service should have its own charter and the same statutory independence as the ABC and SBS.

The NITVC proposal envisages that the service will require recurrent government funding for its establishment and operation, and immediate seed funding for its implementation. Capital funding would be needed to establish a studio and head office, and for the acquisition of production, broadcasting and transmission equipment. The board of the new broadcaster would have a majority of Indigenous members, with fewer than 50 per cent of board members being appointed by the government. The NITVC does not anticipate restricting board membership to NITVC members if others offer significant industry expertise. Management, commissioning departments and the news studio would be based in Sydney. Apart from news and current affairs, programming would be commissioned from Indigenous producers across Australia.

Pilbara and Kimberley Aboriginal Media (PAKAM) supports the NITVC proposal for a national stand-alone Indigenous television service. PAKAM's primary concern is the interests of Indigenous people living in remote locations. It proposes that in addition to developing the national service, which would of course be aimed at a wider audience, the ICTV narrowcast service transmitted by Imparja Television should continue as a parallel service even after the

national Indigenous television service has been fully established.

Broome-based Goolarri Media, currently produces content for its local narrowcast television service, GTV35, and has also produced a number of television programs for national audiences which have been broadcast on the ABC and SBS. Goolarri Media supports a model for a national Indigenous television service which would respect Goolarri's local autonomy and its right to preserve local community interests on its existing service. Goolarri hopes the proposed national television service will complement its existing service, and indicates that while it plans to produce content for the new service, it also plans to continue to produce content for the ABC and SBS after the service is established.

The Northern Territory Government supports a model of staged introduction of an Indigenous television broadcasting service. This model would build on an expanded version of the ICTV narrowcast service transmitted by Imparja Television, taking advantage of the fact that Alice Springs is already a hub for Indigenous employees in the media industry. The Northern Territory Government argues it is important that the model developed for an Indigenous television broadcasting service is not highly centralised with a capital city centred operation away from the areas of the country where the largest number of Indigenous languages are spoken. The Northern Territory Government believes that if a capital city-based model is adopted all the reasons the mainstream media fail Indigenous Australians are in danger of being replicated. It believes an Indigenous television service should be based in Alice Springs and draw upon the strong cultural resources which already exist in central Australia.

The Australian Film Commission (AFC) supports the NITVC proposal but goes on to say that in the event that the Australian Government decides not to support that model, an Indigenous television content production fund should be considered. This could take the form of either a separate Indigenous television commissioning service, similar in form to the Film Finance Commission Australia, or be part of a larger television production fund (mooted by the AFC in its submission to two other digital television reviews currently being conducted by DCITA under clause 60(1) of Schedule 4 to the BSA). Such a fund would have its own discrete and specified allocation for production of Indigenous content and its own Indigenous decision-making processes.

Public consultation meetings

Opinions varied on an appropriate licensing model for Indigenous television, particularly when it came to the issue of the type of licensing which would be appropriate. Some participants favoured a narrowcasting licence, others were attracted to the idea of a whole new licence category.

A Brisbane participant supported the commercial licence category:

> I think there should be a commercial licence … so that money can be made out of it. Whilst ever the community licence is on it you are going to struggle to get sponsorship.

She also felt that:

> There is a big stigma with community, certainly radio, and probably TV as well, with advertisers and advertising agencies. They look at community as being amateur, non-professional and they don't want to put their money there you see. So as soon as people find out you've got a community licence you're basically discounted.

A speaker at the Alice Springs session felt that it might be appropriate to begin with a narrowcasting licence:

> The fact is that there are possibilities for operating an Indigenous service under existing operations that could clearly meet most, if not all, of the requirements of an open narrowcast service. And so on the face of it there is no requirement for major legislative changes for an Indigenous TV service to start its operation. Whether or not in the longer term there is either a need or a preference for a specific category to be chosen, well I think we'd be seen to decide after the decision is made to pursue an Indigenous television service.

Many people felt an entirely new category of Indigenous broadcasting licence would be the best option. A Perth speaker summed up this view:

> You're looking at a whole new way of defining the Aboriginal voice. Therefore it would make the other categories a bit null and void you'd imagine, and the cultural articles and the differences can be taken into account in terms of creating this new form of licence to support the new expression.

1.3 Spectrum and transmission

Spectrum and transmission issues are closely allied to issues surrounding the choice of a model. One of the models raised as a starting point for debate in the discussion paper for this review involved carriage of an Indigenous television service on either the ABC or SBS, using some of their digital multichannel capacity.

The ABC's submission states that the ABC does not have the multichannel capacity to carry an additional service. In addition, it notes that the ABC can only carry programming consistent with its legislation and editorial policies. This would preclude the broadcast of material which included advertising or sponsorship.

SBS points out that, although providing Indigenous programming is central to its Charter, it is also required to serve the communications needs of a wide range of other audiences. However, SBS indicates that it is open to partnership and collaboration to assist with the provision of additional Indigenous broadcasting services. In the longer term, as compression technologies and digital take-up improve, SBS expects its transmission capacity to increase, and anticipates that it may be technically possible at that time for SBS to work in conjunction with an Indigenous television service to use SBS multichannelling capacity. SBS points out that the SBS board would still be responsible for any content transmitted over the SBS spectrum, and notes that the imposition of a mandated content requirement would be unprecedented for a national broadcaster.

As noted above, the ABA believes that the choice of transmission option is one of the main factors that will determine the viability of the service.

While acknowledging its proposed model falls outside the ABA's current planning and frequency allocation regime for digital television, the NITVC argues that the service needs to commence in analog in order to provide optimum access to viewers from the outset. In its submission, the NITVC advocates the spectrum currently set aside for the fourth commercial channel in metropolitan areas being used for an Indigenous television broadcasting service.

The NITVC proposes to establish its own national transmission network. This would involve the installation of 12 new transmitters in metropolitan areas, and a further 30 to 40 in regional centres. While work is being carried out on the new infrastructure, the NITVC plans to exploit other delivery options such as multichannelling on national and commercial television services, pay TV, satellite direct-to-home (DTH) and the Internet. NITVC makes it clear, however, that none of these options is an adequate substitute for the availability of national terrestrial transmission via its own infrastructure.

The NITVC states that should its proposed model be adopted it would initially negotiate to share existing satellite capacity currently used by Imparja Television for delivery of the ICTV narrowcast service on the Optus C1 satellite. This would enable the new service to commence transmission immediately. As the service develops, the NITVC envisages moving to dedicated C1 capacity as part of Imparja Television's multiplex.

The Northern Territory Government recommends that regional switching should be possible within an Indigenous television service so the service does not become monocultural, but represents regional language groups and is appropriate for people living in remote areas as well as the major urban centres.

1.4 Programming

Submissions

NITVC, which proposes that test broadcasts begin in 2005, states that a half-hour, daily national news program with input from regional Australia, as well as acquired international Indigenous news (re-read), would be central to its start-up schedule. NITVC regards children's programs and Indigenous cultural programming concerned with education, maintenance and revitalisation of culture and language as other key areas. NITVC envisages that the charter of an Indigenous television service would require it to produce content across the full range of programming genres. NITVC would expect to exceed the current Australian content requirement for commercial free-to-air television of 55 per cent local programming. In addition, NITVC would expect to augment its schedule with international material acquired from Indigenous filmmakers.

The AFC submits that if an Indigenous television broadcasting service is introduced as a third national broadcaster, the production and broadcast of Australian content must be central to its charter. The new service should be funded to a level which ensures it can provide the same minimum levels of Australian content as the free-to-air networks.

The Northern Territory Government points out that remote Indigenous broadcasters have been making television programs for 25 years. These are often videos of cultural and community events which have been rebroadcast to the relevant community on one of the remote Indigenous television stations. The Northern Territory Government points out that these programs remain very popular with communities despite appearing less sophisticated to an outsider than programs made by urban Indigenous Australians. The Northern Territory Government is concerned to ensure that this unique programming style is not lost. It cautions against Indigenous programming which is merely a duplication of existing programming with an Indigenous slant, and believes that any Indigenous television service must be distinctly different from the mainstream.

SBS argues that an Indigenous television broadcaster should complement, rather than duplicate, the range of existing services, including those provided under SBS's charter. SBS acknowledges, for example, that it does not currently provide programming such as educational television services that teach Australians and Indigenous communities about Indigenous languages and cultures, yet these are not widely available through other services.

As to whether programming should be commissioned or produced in-house, SBS makes the point that in-house production involves significant fixed costs and a constant programming output that cannot be altered quickly to respond to changing audience priorities. In recent years, SBS

has moved away from in-house production towards a mixed model which emphasises commissioned programming. SBS believes its experience suggests that developing programming around fixed studio space can lead to program-making decisions being infrastructure led, rather than creatively led.

NITVC indicates that all programming, except news and current affairs, would be externally commissioned or acquired. It expresses a wish to develop a strong commissioning culture which would contribute to skills development in the Indigenous production sector.

Public consultation meetings

On the question as to whether an Indigenous television service should produce its own programming or commission it from external production houses, a Melbourne speaker expressed concerns about the commissioning model, arguing that it would remove editorial control from Indigenous program-makers and place it in the hands of the broadcaster purchasing the program. She said that:

> ...any model that doesn't have defined outlets that are in control of Indigenous people is going to be problematic.

A Townsville speaker said of the commissioning process:

> You lose some control because you have to have a big name on the project—and a black name isn't quite big enough yet in a lot of instances—before you can get funded properly.

Another Townsville speaker pointed out that the issue of commissioned programming was also relevant to the issue of localism (see the *National vs. local* comments below):

> If we go the commissioning route where there are dollars for production, then it could happen anywhere.

1.5 Target audience

Submissions

NITVC argues that Indigenous television needs to deliver a primary service to all Indigenous people whether in metropolitan, regional, rural or remote communities and that Indigenous people will in turn be the primary audience for the service. Non-Indigenous Australians would make up the secondary audience, although NITVC believes it is possible that this secondary audience could be greater in number than the primary one. NITVC believes an international audience could also be reached through the sale of programs made by or for the service.

The PFTC notes that the Indigenous population has a younger age skew than that of the Australian population as a whole. It believes, therefore, that the target audience for an Indigenous broadcasting service should be children and young people. It suggests that from

the first transmission the service should market itself to a young audience, both Indigenous and non-Indigenous, stating that this has proved a successful strategy for Maori Television.

The Northern Territory Government notes that Indigenous Australians in rural and remote areas suffer a double disadvantage in that, not only do they lack access to mainstream services, but there is a cultural gap between their day-to-day lives and mainstream program content. For this reason, the Northern Territory Government suggests that, while there should be a range of Indigenous voices heard on an Indigenous television service, particular care should be taken to ensure that Indigenous people in rural and remote areas are well represented.

Public consultation meetings

Many participants felt that an Indigenous television service should not be directed at a purely Indigenous audience but should inform and educate a broader Australian audience. An Indigenous broadcaster who took part in the Darwin meeting thought that the new service should not only inform and educate non-Indigenous Australians about Indigenous culture and languages but should:

> ...provide an opportunity for non-Indigenous Australia to feel comfortable in learning about Indigenous people if they don't have the opportunity to actually meet Indigenous people.

1.6 Training

The PFTC argues that training is so important that a development and training strategy must be in place prior to the first transmission if an Indigenous television service is to be successful. It also emphasises this strategy must be ongoing so that staff can continually upgrade their skills in response to changes in the broadcasting industry.

Dancing Iris Video believes that the most successful form of training, and one which has produced most Indigenous media practitioners, has been introductory level training designed and run by Indigenous organisations. The submission argues that this has now dried up. Dancing Iris Video argues that if an Indigenous television service is to succeed, training must be established at a number of sites across the country. It suggests that current practitioners should be commissioned to produce relevant training materials, as the training materials currently available have little connection to Indigenous life and culture.

The NITVC regards training as a key to building upon existing skills and expertise in the Indigenous television and production industries. The NITVC believes that training and development must extend beyond the staff of the broadcaster into the industry and communities that will supply the broadcaster with programming. The NITVC believes that, given SBS's experience in establishing a specialist

service, there may be opportunities for an Indigenous broadcaster to commission SBS to provide partnering or mentoring assistance to key personnel before the new Indigenous service is operational.

The NITVC also sees the ABC as a potential source of assistance with training. In its submission the ABC indicates that, as a Registered Training Organisation (RTO), it would be willing to assist in the training and development of staff across the range of production and technical areas required to operate an Indigenous broadcasting service or production company. The ABC notes that it currently employs a range of experienced Indigenous staff who would be able to assist in the delivery of appropriate and accredited training.

1.7 Advertising

Submissions

The NITVC believes that, in the short-term, open narrowcasting status will allow sufficient flexibility for an Indigenous broadcaster to attract advertising and sponsorship. In the long-term, the NITVC envisages an Indigenous television broadcaster having a capacity to advertise similar to that of SBS.

SBS observes that its experience in the marketplace suggests that an Indigenous television service is unlikely to attract sufficient advertising revenue to support any substantial production costs.

The PFTC believes that if advertising is permitted, the promotion of gambling and the sale of alcohol and tobacco should be restricted because of the social damage they have caused in many communities across the country. The precise nature of these restrictions should be decided at board level.

Public consultation meetings

Many participants thought advertising and/or sponsorship would be an important source of revenue for an Indigenous television service. Not everyone agreed. An Adelaide participant felt there should be no advertising whatsoever:

> I believe personally that it should be set up as a non-profit organisation and we don't have to be worried about sponsorship and advertising because we're going back to the same question, which is question one I think, about it being a viable operation. If we put in sponsorship and advertising then they're expecting us to be a viable operation and we're going backwards.

On the question of whether, if advertising were permitted, it should be constrained in culturally specific ways, an Alice Springs speaker expressed the view that this should be left to the Board of the new service:

> There's certain things within the Indigenous community that we don't want advertised on an

> Indigenous television service because by us advertising on there, you know, we're advertising things that we don't want our community to be actually doing. So I think that … your board would consist of a range of expertise, non-Indigenous and Indigenous, and they'd look at certain things that they don't want advertised or what sponsorship they agree on, and then that does go into their Code of Practice which is implemented.

1.8 Language

The AFC notes that there are currently no Indigenous languages heard on the national broadcasters or major commercial networks. ScreenWest points out that in Western Australia alone there are 92 language groups. The PFTC argues that language revitalisation and maintenance of culture should be one of the key objectives of an Indigenous television service, and that all communities should be given the opportunity to share their language, no matter how small their language group is compared with better known and stronger groups.

The Victorian Health Promotion Foundation (VicHealth) agrees, and proposes that the service should feature programs in language from all regions, supported with English subtitles. Key programming genres such as news, sport, drama and documentaries, however, should be broadcast in English.

The NITVC states in its submission that, as language maintenance and revitalisation are two of its key objectives, an Indigenous television service should feature programs in languages from all regions, to be broadcast with English subtitles. The NITVC would establish its own subtitling department but would expect to outsource some of the work.

The Australian Caption Centre (ACC) notes that two groups that are primary beneficiaries of the current captioning regime are people with hearing difficulties and speakers of English as a second language. The ACC quotes figures which suggest that the rate of hearing loss in Indigenous children is markedly higher than among non-Indigenous children, with the degree of loss having been reported as five to ten times as high. The ACC further suggests that 93 per cent of children in remote communities suffer hearing damage from middle ear infections. It also quotes Australian Bureau of Statistics figures indicating that 13 per cent of Indigenous Australians speak an Indigenous language at home. The ACC concludes that captioning of programs in Indigenous languages is a possible solution to the challenges raised by multilingual programming.

The Northern Territory Government is another strong supporter of programming in Indigenous languages but suggests

that the most effective way to carry this out would be through a regional switching mechanism (see *Spectrum and transmission* above).

1.9 Health and related matters

Submissions

Maari Ma Health Aboriginal Corporation notes that one of the most significant challenges it faces in delivering effective health care to its communities in far west New South Wales is lack of access to mass communication. Maari Ma finds it difficult to communicate important health and community development messages to a large number of people quickly and effectively; leading to delays in projects and initiatives designed to help Indigenous people. Furthermore, Maari Ma argues that negative stereotyping of Indigenous people in mainstream media affects the social and emotional wellbeing of Indigenous young people, and that this can in some cases lead to self-destructive behaviour of various kinds, including drug abuse.

The Health Consumers' Council of Western Australia believes that the marked absence of Indigenous people and issues in mainstream media may contribute to poor health outcomes for Indigenous people, especially in the psychological and psychiatric areas.

VicHealth links loss of culture and identity to the poor mental health status of Indigenous people and believes an Indigenous television service could play an important role in re-establishing Indigenous culture and identity and thereby help improve the mental health and wellbeing of Indigenous people.

As the sole provider of legal services specifically for Indigenous Australians in Victoria, VALS envisages that an Indigenous television service would benefit both Indigenous and non-Indigenous service providers by supplying a vehicle for advertising. VALS anticipates that its own organisation would be one of the services to benefit in this way. In relation to Indigenous offender rates, VALS suggests that calls in the mainstream media for a 'tough on crime' approach are immoderate, have a toxic impact on Indigenous Australians, and arguably contribute to their over-representation in the criminal justice system.

Public consultation meetings

At a number of the meetings it was suggested that an Indigenous television service would provide support for health and education initiatives. An Alice Springs speaker said that such a broadcaster would:

> …provide a huge opportunity to actually start to create some very clear lines of communication as in regard to health education, social issues that really in the past I think that we've given a fair bit of lip service to but haven't actually done anything very specific to address it.

An Adelaide speaker suggested that as a visual medium, television is particularly suitable to play such a role:

> Most people on this planet are good communicators in a visual medium and … an Indigenous television network would be a very cost effective way of supporting Aboriginal community organisations and community groups and delivering health promotion, health education and training strategies, and would in some way provide a medium to address the entrenched racism and the bigotry that's part of Australian society.

1.10 Indigenous broadcasting in other countries

Submissions

Many submitters noted that there are models for Indigenous broadcasting in several other countries. Most frequently cited were Maori Television in New Zealand, the Aboriginal Peoples Television Network (APTN) in Canada, Euskal Irrati Telebista in Spain, Teilifis na Gaeilege (TG4) in Ireland, and Sianel Pedwar Cymru (S4C) in Wales. The appendix to the Australian Film Commission's submission, which can be accessed at *www.dcita.gov.au*, contains an account of Indigenous broadcasting internationally.

Public consultation meetings

Many participants in the meetings also felt that Australia should follow the lead of countries like Canada, New Zealand, Wales and others in which Indigenous television services have already been established. The New Zealand service in particular was often singled out as an appropriate model. A Brisbane speaker stated that:

> In New Zealand the Indigenous TV there is totally funded by the government to the tune of something like $60 million a year.

A Cairns participant urged:

> Just get some structure started or modelling and go from there because our brothers and sisters in New Zealand they've got it all worked out years ago. They've got their own broadcast and everything. In Australia we're still behind the eight ball.

Others saw possibilities in a newly established Australian Indigenous television service providing programming to, and receiving programming from, Indigenous broadcasters around the world. A Darwin participant said:

> I think one idea of what this service could provide would not just be … necessarily all Indigenous Australia. There are other Indigenous cultures from around the world that we have very similar issues and we might

> use some of their programming, in New Zealand or around the Pacific, native American. I wouldn't want [the service] to be totally 100 per cent Australian Indigenous content. There is, I think, a market, a niche there that isn't being covered by anybody, and there is a lot of other Indigenous production, whether it's in Greenland or South America or whatever that it could be part of that as well, and it's basically about exposing Indigenous cultures.

1.11 National vs. local

As noted under the discussion of the model above, some submitters felt that a continuation of local programming would remain an important element of Indigenous broadcasting even if a national Indigenous television were to be established. This issue was also raised during a number of the consultation meetings, although there were a variety of perspectives. Many participants thought a national service with local and regional inserts would be appropriate. Others, while not necessarily disagreeing with this approach, were concerned to ensure that local needs be given sufficient weight in the mix. At a public consulation meeting a Broome speaker put it this way:

> It's valuable having a national service, no one's going to deny that at all, but it's also valuable to maintain a control over regional programming and production because that's what is really important to people on the local level.

Local feeling was also strong in Queensland. In northern Queensland in particular there was emphasis on the need not to overlook the Torres Strait Islander people in the Indigenous television mix. A Townsville speaker pointed out:

> In New South Wales and Victoria the government, Commonwealth or State, don't have to look at the Torres Strait Island needs and aspirations, whereas that's inherent in our public services up here.

At the meeting in Cairns there was discussion about whether, rather than attempting to be a national service, an Indigenous television service should have three or four separate transmission areas across the country. A speaker at that meeting summarised this concept thus:

> You could geographically have, say, a national one that covered Brisbane, Sydney, Melbourne, Adelaide, Perth areas, one transponder in a couple of those areas, but you have maybe three additional ones that carry North Queensland, like you've got with Imparja I guess, and Northern Western Australia for instance.

> You might be looking at four transponders. If they're $1.2 million each in the overall scheme of things that's not an expensive part of the overall operation that's being proposed.

1.12 'Our own stories'

> Quite often today's history has been written by non-Indigenous people, but we want to reverse that sort of thing and tell our own stories.

This remark by a Broome participant, at a public consultation meeting expressed a theme which emerged during a number of meetings. A Darwin participant, referring to the ABC and SBS, stated:

> They've got the occasional Aboriginal story, but it's mainly a bad news story, it's not a good news story so we can't really get a start anywhere … even just day to day coverage and issues that are going on in Aboriginal affairs, that's what we wanted our own news service as well.

An Adelaide speaker said that he felt one of the benefits of an Indigenous television service would be to break down false stereotypes held about Indigenous people in the wider community:

> Why should I be told that I'm not a typical Aboriginal because I live in the city, work in the city and I wear suits? So we have got to tell people that a typical Aboriginal is not one that they had in their minds of a wild man living out in the bush, hunting by a spear. We are typical Aboriginals, and it will help break down all those stereotypes… We can then give success stories and people will see us not as monsters to be avoided when we are walking down the street.

2

Discussion of issues

Part Two—Discussion of issues

Part Two of this report contains a general discussion of the key issues raised by the review process and that are relevant to any Australian Government consideration of the establishment of an Indigenous television broadcasting service. As noted above, there was strong support for an Indigenous television service from most participants in the review process. The reasons given for that support included the potential for such a service to contribute to maintenance of languages and culture, affirmation of Indigenous identity, and improving Indigenous health outcomes.

2.1 Viability

Based on the evidence presented to the review, there appears to be a general consensus that an Indigenous television broadcasting service would not be commercially viable without some commitment of ongoing government funding.

The review considered a range of possible models for establishing an Indigenous television broadcasting service, ranging from the establishment of a new, independent broadcasting institution to models that seek to build upon existing arrangements. While those models, which are described in more detail in Part Three of this report, involve materially different levels of revenue for their ongoing operation, the review was not provided with evidence to suggest that any of them could be sustainable based solely on commercial revenue sources (advertising or subscription).

Importantly, however, most submissions to the review have argued that commercial viability should not be the primary objective of an Indigenous television broadcasting service. The submissions argued that an Indigenous television broadcasting service should have, as its primary purpose, a range of objectives designed to provide public benefits to Australia's Indigenous communities and the wider public. A decision by the Australian Government to support the establishment and operation of such a service should have regard to the value of those benefits.

2.2 Objectives and scope

The NITVC submission (NITVC submission, page 5) sets out the objectives that could be appropriate if a new Indigenous television service were established. NITVC describes the key objective as being to inform, entertain and educate Indigenous people. It lists other objectives as:

- empowering Indigenous people through access to a medium which will allow permanent and ongoing

national expression of a dynamic and evolving Indigenous culture and identity

- assisting the process of maintaining and revitalising Indigenous languages and culture
- providing professional options and commercial opportunities for Indigenous people with creative, technical and administrative abilities
- developing skills and resources within the existing Indigenous television and production industries to provide training opportunities and to exploit untapped potential, and to generate growth in these industries
- providing effective and culturally relevant broadcast-based support for community education and government services which strengthen Indigenous development
- presenting Indigenous people, stories and issues to all Australians to promote understanding and to reflect a sense of the rich complexity of Australian identity and culture.

As a primary target audience for such a service would be Indigenous people living in metropolitan, regional, rural and remote areas, any new service would operate more effectively if it had the capacity to deliver its service nationwide. It would also be important that such a service operate in a manner which enables the breadth of interests and perspectives of Australia's Indigenous communities to be reflected in its service.

Submissions indicated, however, that existing local Indigenous television services are highly valued. PAKAM noted that the ICTV narrowcast service currently transmitted by Imparja Television 'has a more specific remote community audience and cultural purpose' than the national service proposed by NITVC. Similarly, Goolarri Media, which transmits Goolarri TV, pointed out that its programs 'reflect the local Broome community' and '[give] back positive and enlivening images to the community of itself'. The review does not consider that a new national Indigenous television service should be established with the objective of replacing existing services.

2.3 Avenues for broadcast transmission

The establishment of a successful Indigenous television broadcasting service depends not only on its capacity to produce programming of relevance to Indigenous communities and the wider public, but on its capacity to distribute those programs to audiences. Most Australians receive their free-to-air television services via analog terrestrial broadcasts. In regional, rural and remote areas, including in a large number of remote Indigenous communities, many households access free-to-air television via satellite direct to home broadcasts.

The Australian television broadcasting industry is also in the process of making the transition from analog to digital

transmission. Digital terrestrial services are being progressively rolled out across the country in areas currently receiving analog terrestrial services. Analog services will eventually cease to operate.

Options for terrestrial broadcasting

The ABA advises in its submission that the digital channel plans (DCPs) 'show (at least) two additional channels planned for [digital video broadcasting] DVB digital television transmissions in all markets, the so-called "datacasting channels", but with power restrictions on some vacant channels and limitations to single frequency networks in key markets' (ABA submission, page 2).

In addition, the ABA notes that 'while channel capacity is limited in regional Australia, in the context of planning for an Indigenous service it should be noted that there are usually fewer constraints on both analog and digital channel capacity in remoter areas and in the north western half of the continent generally, due to the sparseness of settlement' (ABA submission, page 3).

The Australian Government is currently conducting a series of policy reviews that involve some consideration of possible uses for available spectrum in the broadcasting services bands. The outcomes of these other reviews have the potential to affect the spectrum availability identified by the ABA.

Some submitters have expressed the view that analog transmission remains the optimal way to reach Indigenous audiences. For example, while NITVC acknowledges that Australia is moving towards a digital environment, it argues on page 8 of its submission that:

> … analog is still the ideal way to reach Indigenous audiences. The best, immediate response to this submission is for NITV to be funded to commence broadcasting as an analog service, with new analog transmitters in city and regional areas, combined with the existing Indigenous delivery systems.
>
> Analog transmitters will quickly establish cost effective program transmission and audience reach during a transition period where the switch to digital gathers greater consumer momentum in Australia.
>
> Pending completion of its own transmission infrastructure, NITV would also seek to exploit other delivery options such as use of multichannel capacity on government broadcast and commercial services as well as pay TV, satellite DTH [direct-to-home], and Internet. However, none of these short term options is regarded as an adequate substitute for the availability of national transmission via its own infrastructure.

A substantial rollout of new analog television services in capital cities and major regional markets at the current stage of the transition to digital television may not, however, be an efficient use of resources for a new broadcasting service. It would also potentially weaken the Australian Government's efforts to encourage audiences to adopt digital television services.

Key alternative avenues for terrestrial transmission include provision of access to spectrum for digital transmission or the use of some of the digital transmission capacity of an existing broadcaster (or datacaster, should such licences be allocated in the future). Digital set top boxes are now widely available at a relatively low cost (as low as $150). These options are developed in the models contained in Part Three of this report.

Alternative transmission options

As noted above, a significant number of remote Indigenous communities depend on satellite transmission for access to existing television services. Imparja Television's main commercial television service and Indigenous program focussed narrowcast service both provide important platforms for many communities in the remote central and eastern commercial television licence areas.

The use of satellite transmission is likely to be a substantially more cost efficient platform for a new broadcaster. An Indigenous broadcasting service delivered via satellite would be likely to be a 'narrowcast' service for the purposes of the BSA and could therefore be made available nationally. Satellite transmission would, however, impose additional access costs on those who do not currently access satellite distributed television services. The cost impact on potential viewers would need to be carefully considered if a satellite-only platform were to be considered.

A combination of distribution strategies could provide another basis for an Indigenous television service, particularly in its establishment phase. Satellite transmission might provide a core platform, supplemented by arrangements with existing terrestrial broadcasters (such as the SBS and/or community television broadcasters) to retransmit a subset of the service's programs as part of their wider schedule.

2.4 Control and management structure

Indigenous stakeholders feel strongly that an Indigenous television service should be controlled by Indigenous people. NITVC states in its submission that if the service is not owned and controlled by Indigenous people it 'cannot be described as an Indigenous television service' (NITVC submission, page 4). NITVC argues for 'a majority Indigenous Board which could include two Australian Government appointed Indigenous members with specific industry related skills' (NITVC submission, page 13).

As a body wholly or substantially funded by government, an Indigenous television service would be accountable to the Australian Parliament. In addition, if it was established as a corporation it would be required to comply with governance standards established under corporate law. Governance of a new national broadcaster would need to meet the high standards demanded of such a body. Board appointments to such a body would normally be made by the Governor-General as specified in legislation.

Legislation could require that the board represent the breadth of Indigenous communities and interests throughout Australia. Provisions similar to those set in out in Section 11 of the *Special Broadcasting Service Act 1991*, which limits the extent to which the government can give directions to the SBS board and, which in particular, prevent the government from giving it directions in relation to the content or scheduling of programs to be broadcast, could also be relevant.

2.5 Licensing arrangements

While a number of submissions to the review suggested the creation of an Indigenous licence category, this would not be necessary if a new broadcaster were to be established, as the Australian Parliament would enact a statute setting out its powers and responsibilities. In the absence of any decision to establish a new broadcaster, there appear to be no compelling arguments put forward in the submissions to the review for the creation of a new licence category. The current community broadcasting licence structure includes substantial flexibility and is capable of applying to a wide range of community interests, including Indigenous interests. Any specific problems identified with the current rules may be more readily addressed by specific amendments to those rules.

3

Options

Part Three—Options

Based on input received during the consultation period and an analysis of submissions, and taking into account the operation of the television and film production industries, the review has identified four primary options for the establishment of an Indigenous television service. Costings used in Options 2–4 are based on an analysis conducted by consultants Gilbert & Tobin Lawyers, although some stakeholders have suggested that some of the costs in the report have been underestimated. Accordingly, the costs set out below should be treated as broad estimates. Further detailed costings would need to be undertaken in the event that the Australian Government sought to pursue a particular model.

The review has not identified a preferred model for an Indigenous television broadcasting service. Each of the options described below would contribute to an increased capacity for Indigenous Australians to produce and view television programs reflecting their cultures and perspectives. Each, however, also has implementation issues which would need to be addressed. Consistent with the newly established arrangements for the administration of Indigenous affairs, it will be up to the Ministerial Taskforce on Indigenous Affairs to consider these options in the context of competing priorities for funding for Indigenous services, and to make a judgment about which, if any, to recommend to the Australian Government.

Option 1—Establish a national Indigenous television broadcaster

Establish a national Indigenous television broadcaster—$13.6 million capital and establishment costs over five years, plus $80 million per annum ongoing costs by year five

This option would involve enacting legislation to establish an Indigenous national broadcaster along the lines suggested in the NITVC submission. Like the ABC and SBS, the new national broadcaster would require a statutory charter and NITVC has proposed objectives for the service (see Part Two of this report) which could provide a basis for such a charter.

NITVC envisages a service providing a high level of Australian content and delivering approximately 72.5 hours of original and purchased programming per week, consisting of 14 hours Monday to Friday and 2.5 hours on Saturday evening. The service would eventually expand to full-time. The service would produce its own news and current affairs programming, which would be a core part

of the service from the start. There would be a half-hour daily news program five days a week which would include local, national and international stories. A half-hour weekly current affairs program would support the news service with analysis, interviews and discussion.

NITVC indicates that all programming, other than news and current affairs, would be externally commissioned or acquired, with an aim of supporting and developing the Indigenous media industry. Under this model Australian content would exceed 55 per cent. The NITVC submission includes a Business Plan that suggests a weekly schedule including (NITVC Businesss Plan, pages 6–7):

- sport—a half-hour daily sports program with regional and local sports
- language—a half-hour daily program for adults and a separate half-hour for children
- children's programming—a one-hour children's morning program and a one-hour afternoon program for youth
- documentary—at least one half-hour documentary slot per day for both national and internationally acquired programming
- music—a one hour per week program commencing with material acquired from sources including communities and international sources
- remote community television—existing and new content
- special events including outside broadcasts
- cultural programming—one hour per day with content ranging across education, culture, arts and music
- educational—the NITVC believes that the service could be used to assist in the delivery of special education programs for children and adults. These programs could be co-devised with specialist training institutions and curriculum developers and Indigenous producers.

In its Business Plan (NITVC Business Plan, page 10), NITVC notes that under this model the 'management, commissioning departments and news studio would be based in Sydney'.

This option would meet the objectives of Indigenous stakeholders that there be an independent, Indigenous controlled, Indigenous television service. However, NITVC estimates the cost of establishing a stand-alone service with broadcast and transmission capability and a capital city headquarters and studio at $73.6 million over five years, with an ongoing cost of $80 million per year for operating costs and program commissioning, acquisition and production. Even if potential revenue from advertising and/or sponsorship was factored in, it is unlikely that more than a small proportion of this cost would be recouped, meaning that this option would involve a significant cost to the Australian Government.

The NITVC model calls for immediate access to spectrum for analog transmission in Australia's major centres. As noted in Part Two of this report, spectrum scarcity and the Government's wider policy objective of transitioning to a digital environment suggests that an analog broadcaster model would be an inefficient use of resources and potentially counterproductive to the broader objectives of digital conversion.

An alternative broadcast model could make initial use of the satellite capacity of the ICTV narrowcast service transmitted by Imparja Television, supplemented by access to the digital terrestrial broadcast capacity of an existing broadcaster (a national broadcaster or, potentially, a future datacast licensee). Such an arrangement would reduce the direct capital and establishment costs of the service to around $13.6 million, although it must be acknowledged that an indirect cost would continue to exist for transmission services borne in the transmission costs of the national broadcaster. Additional direct costs would be involved where transmission services were contracted from a third party, such as a datacaster.

It should be noted that if this option was adopted the new service would be expected to complement, rather than replace, existing Indigenous broadcasting services.

Option 2—Impose an increased Indigenous programming responsibility on SBS

Impose an increased Indigenous programming responsibility on SBS—$4.8 million capital costs, plus $5.7 million per annum and ongoing distribution costs with some content-specific costs

Under its Charter, SBS is required to contribute to meeting the communications needs of Aboriginal and Torres Strait Islander communities (paragraph 6(2)(a) of the *Special Broadcasting Service Act 1991*). However, as the legislation currently stands, in order to fulfil its charter requirements SBS needs to balance this with its other obligations. Over-emphasis on one group to the detriment of others could lead to criticism from other SBS stakeholder interests. In 2003–04 SBS broadcast approximately 11 hours of first run Indigenous programming.

Option 2(a)

Under this option legislative changes could be made to require SBS to dedicate multichannel capacity to, say, at least 14 hours of Indigenous programming per week. No provision for analog transmission is proposed in this option.

Gilbert & Tobin Lawyers has estimated the cost of establishing an Indigenous broadcasting service using an existing national broadcaster multichannel

providing 14 hours of programming per week using an Indigenous production centre to be $4.8 million in capital expenditure and $5.7 million in annual running costs. These costs do not include transmission, as the service would use existing multichannel transmission capacity. This could, for example, deliver an approximate three hour weekday program schedule of:

- education—20 minutes
- children's programming—30 minutes
- news—two broadcasts, one of five minutes and one of 30 minutes
- entertainment—30 minutes
- day specific programming of sports (weekend round-up)/music/arts/news analysis/current affairs—60 minutes.

A degree of Indigenous control could be achieved within this option by identifying one or more Indigenous positions on the SBS board; having an Indigenous advisory committee to advise the board on Indigenous programming matters; or establishing a code of practice for that aspect of SBS output combined with a mechanism to adjudicate complaints made about the Indigenous programming stream.

Option 2(b)

Thirty hours per week of first-run programming, consisting of six hours five days per week (with some programs repeated on Saturdays and Sundays), would cost $4.8 million in capital expenditure plus $32.7 million per annum (including $27 million for commissioned programming additional to the $5.7 million annual running costs for the Indigenous production centre). This programming could, for example, include:

- news—three broadcasts, one of five minutes and two of 30 minutes each
- education/information—20 minutes
- children's programming—30 minutes
- entertainment—a total of approximately 60 minutes, at different times
- day specific programming of sports (weekend round-up)/music/arts/news analysis/current affairs—60 minutes
- infotainment—60 minutes
- drama—60 minutes.

Structurally this option could be implemented in one of two ways. Either SBS could be funded to provide the new Indigenous programming stream, possibly through expansion of its existing Indigenous unit, or an independent Indigenous unit could be established with a guaranteed outlet on one of SBS's multichannels. The first option would be marginally less expensive. However, the second option would enable the service to be more clearly branded and provide the capacity for greater Indigenous control.

Due to the level of take-up of digital television to date, access could be an issue with this option. However, the availability of a new stream of different and interesting program content could

also contribute to increased digital television adoption. It should be noted that the cost of accessing digital television services is now relatively low and can be expected to continue to decline.

It should be noted that in its submission to the review SBS indicated that it currently has no spare multichannel capacity and that this will continue to be the case in the short-to-medium term. However, SBS acknowledges that in the longer term its transmission capacity is likely to increase, as compression technologies improve and digital take-up expands. It should be noted though, that this situation is a result of current programming decisions by SBS and would alter if the Australian Parliament imposed new statutory Indigenous programming obligations on SBS. Clearly the extent of any additional obligation on SBS would need to be carefully considered in the light of the impact it would have on SBS's wider operations.

As was noted in relation to Option 1, if either of these sub-options were adopted they would be expected to complement, rather than replace, existing Indigenous broadcasting services.

Option 3—Build on the Indigenous Community Television narrowcasting service transmitted by Imparja Television

Build on the Indigenous Community Television narrowcasting service transmitted by Imparja Television—$10 million per annum for capital and content costs, plus some ongoing distribution costs

In addition to its main commercial television channel, Imparja Television currently transmits a satellite delivered television service, ICTV, which provides Indigenous programming supplied by remote Indigenous broadcasting hubs, such as PY Media, for up to ten hours per day. Locally produced video and archival content for the channel is supplied by remote Indigenous broadcasting hubs and is sent to Imparja Television for uplink to the Optus Aurora satellite platform. (Uplink costs are currently funded under the Indigenous Broadcasting Program.) The service is then re-transmitted in remote Indigenous communities by analog transmitters. The ICTV service is not only available in remote communities but across the whole of Australia direct-to-home by satellite on application to Imparja Television, which has a policy of unscrambling the ICTV signal on request. (As a narrowcasting service, it is not subject to licence area limitations.)

Under this option, ICTV would be funded to commission or produce additional Indigenous content to strengthen its schedule. Possibilities include funding a daily news service or a weekly current affairs program. Gilbert & Tobin Lawyers have costed the production of news and current affairs material at the standard used for the *Dateline* program at $32 500 per hour.

Annual funding of $10 million would fund, in Year 1, approximately 14 hours of programming per week of content involving a similar genre mix to that outlined in option 2(a), plus provide capital funding of $4.8 million to increase ICTV's production capacity. From Year 2 onwards the additional $4.3 million per annum would be used for commissioned programming. Based on Gilbert & Tobin Lawyers' costing of $360 000 per hour for commissioned programming, $4.3 million would enable the production of approximately 12 hours of additional program content per annum.

Viewers in regional and urban areas would need to buy a set top box and a satellite dish in order to receive ICTV. (The cost of this equipment and its installation is currently estimated to be between $1000 and $1500). As part of the funding agreement, the Australian Government could consider requiring funded ICTV programs to be made available to broadcasters such as SBS and community television (which is now licensed in Brisbane, Melbourne and Perth, with a Sydney service to commence later this year) to provide additional incentives to reach a wider audience.

This option would provide for Indigenous control and would also provide a boost to the Indigenous television production industry. An access issue will arise with this option as ICTV is not a legal entity. The content supplied to Imparja Television for transmission is vetted by Imparja as the narrowcaster. The Imparja board is currently representative of the Indigenous interests of its primary service's licence area. If this option was to be pursued, negotiations could occur as to an appropriate governance model for the expanded ICTV service that would be more representative of Indigenous people across Australia.

This option does not pre-empt any decisions about future carriage of the service on a digital platform.

Option 4—Establish an Indigenous television content production fund

Establish an Indigenous television content production fund—$6 million per annum

This option involves establishing a commissioning fund. Like SBS Independent (SBSi), the fund would be 100 per cent outsourced to the Australian independent production sector to make feature films, drama, documentaries, animations and other

programs for broadcast across a range of platforms e.g. the ABC, SBS, ICTV, Imparja Television's commercial service, and community television. A specified percentage of funding, possibly 50 per cent, could be earmarked for regionally based production. Intellectual property rights would be retained by the independent producers, which would leave them free to raise additional funding from other sources e.g. SBSi, the AFC, the Australian Film, Television and Radio School, the Film Finance Commission Australia, the Australian Centre for the Moving Image, and individual state film funding bodies.

An annual fund of $6 million would enable the production of a weekly news and current affairs show and a monthly low cost documentary/drama/children's program. The fund could either be stand-alone or could involve the expansion of an existing fund such as SBSi. The former option would be more obviously independent but could involve substantial administrative costs which would lessen the funds available for content production.

This proposal would assist in the development of a stronger Indigenous television production industry, and in doing so would strengthen the Australian independent production sector as a whole. An issue with the proposal is that it would not deliver a branded continuous Indigenous television service, as content would be made available to all interested broadcasters and would be spread amongst other programs. The spread of programs among different broadcasters would also mean not all Indigenous people would be able to view all programs (e.g. people living in Sydney and Melbourne would not be able to see a program only broadcast on Imparja Television's commercial service).

4

Consultant's report

Part Four—Consultant's report

Background to commissioning of the consultancy to investigate the costs of a number of options in relation to Indigenous television broadcasting

The Department of Communications, Information Technology and the Arts (DCITA) commissioned the following consultant's report by Gilbert & Tobin Lawyers, to obtain expert advice on the costings of several options in relation to establishing an Indigenous television broadcasting service.

The report is not a policy document and the options costed in it are not intended to pre-empt the findings of the review, but rather, are financial and technical matters that the Department considered necessary to canvass as part of the review.

The Department is aware the report covers only some elements of the costs that may be involved in establishing an Indigenous television broadcasting service and that other potential costs, such as for the subtitling of programs, have not been taken into account in this report.

The Minister for Communications, Information Technology and the Arts, Senator the Hon Helen Coonan, released the consultant's report publicly in July 2004, with the names of individuals excised for privacy reasons.

Consultant's report — Gilbert & Tobin Lawyers

'Options for an Indigenous broadcasting service'

Consultant – Rob Nicholls

Contents

1. Executive summary

1.1 Introduction

Our basic design approach was to consider a model for the production and transmission of services:

- with production values equivalent to the SBS "Dateline" program;
- delivered by satellite for transmission; and
- terrestrially transmitted using digital technology in metropolitan and regional Australia and analogue transmission in remote Australia.

1.2 Position of national broadcasters

The national broadcasters each took the opportunity of putting some of the positions that they will include in their submissions to the Department's review. These were:

- Each of ABC and SBS has plans to use all available digital capacity (including multi-channels) in metropolitan and regional Australia.
- There would be a significant impact on the operations of either SBS or ABC in taking responsibility for the output of an Indigenous broadcasting unit of any significant scale. The proposed programming output of an Indigenous programming unit is 14 hours and this is comparable with:
  - SBS news and current affairs production of 14 hours of programming each week; and
  - ABC news and current affairs production of 26.5 hours of programming each week.[1]
- The need for a production unit was questioned by one of the national broadcasters (SBS) which favoured a model that is based on commissioned programs. SBS indicated that the proportion of SBS Independent expenditure on indigenous programming (broadly defined) has ranged from 5% to 17%. SBS considers that alternatives to an independent production unit include:
- increased budget for commissioned programming; or
- increased support for the AFC Indigenous Unit.

1.3 Goods and Services Tax (GST)

All of the pricing information included in this report is based on prices excluding GST. This is consistent with a commercial approach that expects the net effect of GST to be offset by input tax credits.

1.4 Meeting the terms of reference

1.4.1 Cost by genre per hour

Genre	ABC	SBS	CAAMA	Commercial
News and Current Affairs	$32,500	$32,500	$4,000	Average $80,000 (but with large variation)
Children's	$400,000 – $900,000	$400,000 – $900,000	$360,000	$400,000 – $900,000 some lower cost at $150,000
Drama	$400,000 – $900,000	$400,000 – $900,000	$360,000	$400,000 – $900,000 some lower cost at $150,000
Documentary	Lower end of range $200,000 – $500,000	Lower end of range $200,000 – $500,000	$900,000	Average $375,000

1.4.2 Establishing an Indigenous production unit

The cost of establishing an Indigenous programming unit with production values similar to those of SBS "Dateline" and capable of producing about 14 hours of SDTV programming each week is:

Capital Expenditure $4,387,000

Cost	Expenditure
Running costs	$1,790,650
Salaries	$3,880,000
TOTAL ANNUAL EXPENDITURE	**$5,670,650.00**

That is, a Year One cash call of $10,057,650 and $5,670,650 per year in subsequent years. These costs do not include transmission.

1.4.3 The cost of establishing a stand-alone Indigenous broadcasting service

A stand-alone Indigenous broadcasting service would have the costs of production for the core services as set out above. However, this would deliver only the base programming provided in the production unit case set out above. If this were to be supplemented by four hours of drama per week (100 original hours per year plus repeats) and an infotainment program (60 minutes per weekday), then a six hour wheel could be produced for five days per week with repeats on Saturday and Sunday (to avoid the premium labour costs of weekends). This, along with additional commissioned programming (assumed to be language and culture programming and acquired library material) means that the cost of operating an Indigenous broadcasting service comparable to SBS (but with substantially more limited programming) would be approximately:

Capital expenditure:
$4,387,000 + $400,000 = $4,787,000

Item	Cost
Production unit:	$5,670,650 per year
Commissioned programming	$27 million per year
Transmission:	$26 million per year
TOTAL	~ $59 million per year

1.4.4 An Indigenous production unit within a national broadcaster

There are two potential models for integration:

(a) a separate and independent Indigenous programming unit that shares the national broadcaster's administrative functions; or

(b) complete integration with an assumption of synergies from existing infrastructure.

Separate unit

The cost of establishing an Indigenous programming unit, which shares the national broadcaster's administrative functions, with production values similar to those of SBS "Dateline" and capable of producing about 14 hours of SDTV programming each week is:

Capital Expenditure $4,387,000

Cost	Expenditure
Running costs	$1,590,650
Salaries	$3,574,000
TOTAL ANNUAL EXPENDITURE	$5,164,650.00

That is, a Year One cash call of $9,551,650 and $5,164,650 per year in subsequent years. These costs do not include transmission.

Integrated unit

The cost of establishing an Indigenous programming unit with production values similar to those of SBS "Dateline" and capable of producing about 14 hours of SDTV programming each week within a national broadcaster is:

Capital Expenditure $2,289,000

Cost	Expenditure
Running costs	$1,790,650
Salaries	$1,090,650
TOTAL ANNUAL EXPENDITURE	$2,881,300.00

That is, a Year One cash call of $5,170,300 and $2,881,300 per year in subsequent years. These costs do not include transmission.

1.4.5 Assess the cost of establishing an Indigenous broadcasting service which would use existing national broadcaster multi-channel

The cost of establishing an Indigenous programming unit with production values similar to those of SBS "Dateline" and capable of producing about 14 hours of SDTV programming each week, delivered using an existing multi-channel, is:

Capital Expenditure $4,787,000

Cost	Expenditure
Running costs	$1,890,650
Salaries	$3,880,000
TOTAL ANNUAL EXPENDITURE	$5,770,650.00

That is, a Year One cash call of $10,057,650 and $5,670,650 per year in subsequent years. These costs do not include transmission.

Both ABC and SBS have an existing transmission facility which provides for the delivery of the complete multiplex of its services. That is, the distribution system delivers approximately 20 megabits per second which represents the usable payload of a digital television service. This payload can be configured to be a combination of high definition and standard definition channels along with associated enhancements and data casting.

If an existing multi-channel were to be offered by either ABC or SBS then the additional cost of delivering an Indigenous programming service to an existing time zone would simply be the cost of time delay for the Indigenous broadcasting service and the cost of a telecommunications link between the master control room of the Indigenous production unit and the relevant central distribution point of either ABC or SBS (that is, either Ultimo or St Leonards in Sydney).

1.4.6 Update of the costings on page 77 in the NIBS feasibility study

We have not reviewed the likely costs of radio, online or existing media aspirants and do not think it is appropriate to include approximations in this report. Therefore, our comparison with the table of the NIBS report on page 77 is essentially a comparison of the basic television service using the 14 hours produced by the production unit and the optimal service which is the full six hours set out above and to allow a reasonable comparison, we have eliminated other numbers. This yields the following table:

Line item	NIBS basic TV		NIBS optimal TV	
	Original	Revised	Original	Revised
Total budget (paid transmission)	$37.68 million	$31.7 million	$47.81 million	$59 million
Total budget (via national broadcaster	$35.76 million	$5.67 million	$45.89 million	$33 million

2. Production for an Indigenous broadcasting service

2.1 Introduction

Any evaluation of program production costs must have some parameters to establish a base case. Inevitably, in broadcasting, this base case must relate to production values.

There is virtually no upper limit to the values of a production. The challenge is to find an appropriate set of values that will deliver an acceptable product. We have assumed that an Indigenous broadcasting service will not have substantially lower production values than equivalent mainstream services. This assumption could be changed by a policy decision.

We have developed a costing for a service which uses both a traditional set of technical and editorial quality parameters, and an innovative one which trades quality for either quantity or feasibility or both.

Clearly, capacity building in the form of a training and development component may well be highly desirable in the context of Indigenous broadcasting, but naturally it will come at a price. Any decision to include such a component will be made on considerations that have little to do with pure economic reasons.

For the purposes of constructing a model, we have chosen to consider only standard definition television production and the costs of high definition television production would be significantly higher.

2.2 Models

We have been asked to provide costing for a variable number of production hours. Without reference to programming genres, there is a wide range of options, as different kinds of programs require widely different technical, human and financial resources. For example:

- We could decide to develop a capability based on a studio, because a studio, although expensive to build, is the cheapest program-making facility available using mainstream criteria.
- Alternatively, we could opt for a unit or units that rented existing studio facilities from TV stations and production facilities on an as-needed basis. One could design a range

of program goals which did not need studio facilities at all (for example, documentaries and sporting events).

For the purposes of the consultancy we need to start by adopting a model, and then cost it. Before we do that, though, we have to accept a fact that has a major bearing on our model and subsequent design. This is the fact that a production centre will have to employ operational staff (camera operators, editors, sound recordists, technicians etc) and anyone involved in handling television production and broadcast equipment is covered by an award such as the Television Industry Award 2000 or the ABC award.

The fact that the operators are employed under the such awards—with their minimum four hour payment blocks and other restrictions—means that it is impractical to staff anything but a minimum of a four hour a day, five-day a week operation, and it is uneconomical to staff anything but a five-day, 38-hour a week operation

While it is possible to come up with other models, the operation just outlined suits best a studio facility (with or without a transmission module connected to it) around which other production and post-production facilities hang. So we will use this model as the core technical facility for our production unit.

2.3 Design

Our approach was to design a core program line-up (which we then cost) around this "compulsory" minimal operation, which can grow but not shrink, and we make more assumptions about the production unit's operations:

- that most of the productions are based around the studio in order to maximise the substantial investment made;
- that training and development of staff is structurally integrated in the production unit's operations, and therefore the studio floor is staffed for manual operation;
- that non-studio based program production is outsourced in its entirety and budgeted accordingly;
- that news and news-style programs are a core function, consistent with the position taken by previous papers on an Indigenous broadcasting services, and should be the production unit's first priority.

A complete, half-hour daily news bulletin produced from scratch is a serious and costly undertaking, and is probably beyond the scope of the production unit, at least at inception.[2] However, a different style of news service becomes feasible when modelled on the example of an existing independent TV station airing news bulletins every weekday, such as Alice Springs' Imparja.

In Australia, very few "independent" non-network stations remain. Imparja Television makes effective use of a model in which two or three local stories are embedded in the body of a news bulletin largely made of national news provided by a commercial network (TEN) and rebadged through a local compilation and presentation.

Such a service could be commercially bought at an annual figure of $200,000[3] but other arrangements could be devised, especially if the national broadcasters SBS and ABC were involved.

Such a news service would make use of the studio at most two hours a day including setup time and updates.

Other programming suited to studio-based production includes:

- news analysis;
- a community event program;
- talking head programs which may also include limited range performances;

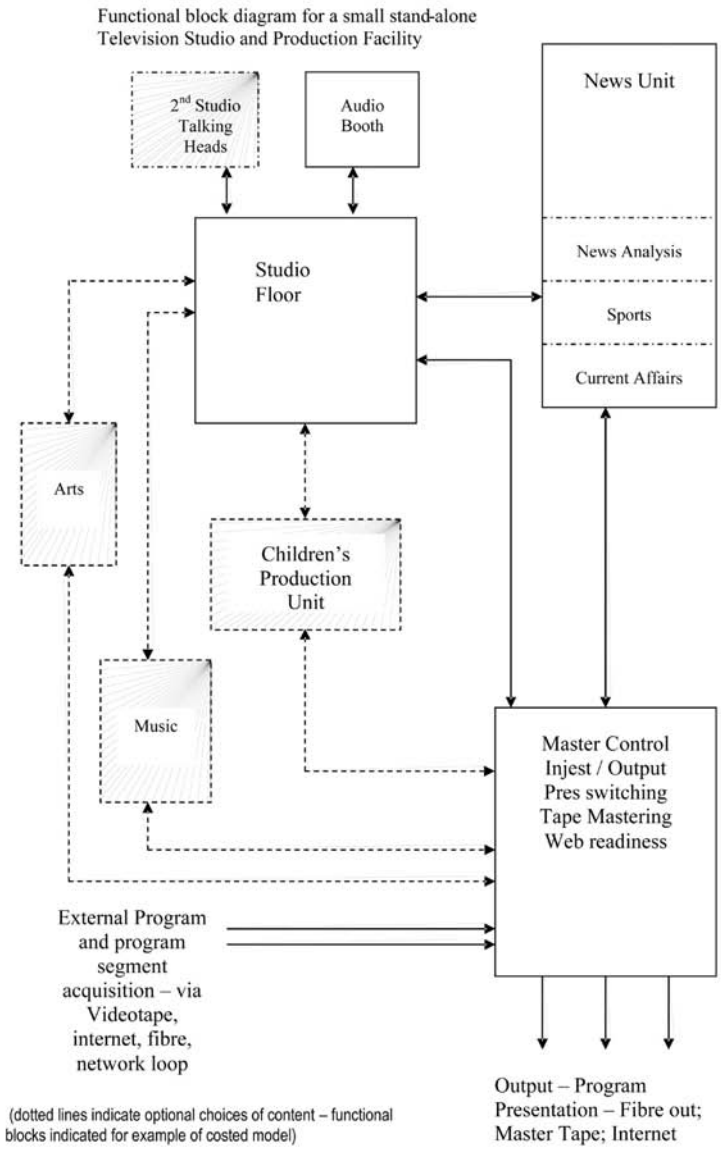
and, supported by field location shoots, post production and a substantial travel budget, a suite of other programs. For example:

- education programs;
- children's programs;
- an arts program;
- a music program.

From this scenario, a range of programs can be readily produced. We have used a mix of programs as set out below. This production output of some 14 hours a week would be supplemented by outsourced productions commissioned by the Production Unit—say an extra 100 hours a year—two hours per week. The staffing structure for this model must be consistent with the other television production an Indigenous broadcasting service might undertake.

Figure 1 (on opposite page)—Production design model, provides an idea of how production and operations integrate around the studio facility and other ancillary technical facilities.

Figure 1 – Production design model



2.4 Production values

There is a wide range of quality for studio-based productions. In setting up a model for evaluation and costing, we have used as a reference the SBS "Dateline" program. This provides a common ground for the design of the program elements to be integrated to a final product of satisfactory quality throughout. It is also well recognised by many people and provides a good subjective reference for evaluating quality.

"Dateline" was one of the first national programs to be edited with a standard computer front end and utilises a common arrangement of field acquisition, post production, archive inclusion and studio hostings.

With a modern approach in mind, the design of the field acquisition included disk based recording backs (in conjunction with tape as back-up). This allows the most efficient method for field editing if required and integration to post production facilities.

The studio has been designed to have dimensions of 120 by 150 square metres. This is sufficient for a good depth of field and allows for a great flexibility for differing sized sets and arrangements to cater for a wide variety of studio performances.

As this production facility has been designed around a reference quality it has been costed accordingly. Considerations have been given to the overall programming and production requirements with their associated budgets for larger and higher-end productions. These will form part of commissioned work and be produced off-site in facilities designed and built for much greater levels of flexibility, functionality and quality. If the production values had been set higher for this model, it would have resulted in a high-cost facility that would run, for the majority of the time, below its potential quality. It would likely be severely under-utilised compared with the original expectation of 100 to 200 hours per year.

The facility will work in conjunction with an overall program strategy that would include outsourced high-end studio productions.

With this in mind, the cameras were selected to be three studio floor units on basic pedestals. While this limits some lavish productions, it allows for a range of studio options and keeps the overall set up cost relatively low, without compromising the technical quality. More cameras on the floor escalate the cost of all associated control room equipment.

The chosen studio size would allow for more cameras and associated control room equipment to be installed at a later stage. No attempt has been made to cater for high-definition production into this costed design for the studio components.

The studio has been kept at a level to provide a good quality of product that will marry well with the quality of the field and post production equipment to provide an overall production quality appropriate for a national broadcaster.

2.5 Costs

An Indigenous Production Centre on the model described in the preceding paragraphs would cost about $4,387,000 to set up and in the vicinity of $5,670,650 to run for a year.

The annual costs include running costs of $1,790,650 and salaries of $3,880,000. Appendix 1 sets out a detailed breakdown of the costing assumptions.

2.6 Example of production schedule

A production schedule, ten minutes short of 14 hours per week, could include the following components:

Weekdays

- Three minute news brief;
- 20 minute children's education/information program;
- One half-hour children's program;
- One half-hour news bulletin
- One half-hour entertainment program;

plus day-specific segments as follows:

- *Monday:* Sports—Weekend Round-up
- *Tuesday:* Music
- *Wednesday:* Arts
- *Thursday:* News analysis
- *Friday:* Current affairs

Weekends:

Saturday

- One hour compile: best of children's week;
- One half hour expanded music program including music clips and discussion;
- One half hour sports roundup and discussion panel on the weekend's sporting events.

Sunday

- Repeat of education, music, arts, current affairs and news analysis.

2.7 Feasibility of the selected model

We have pointed out that whenever a television broadcast is involved, staffing and associated costs are referenced to the current awards. This results in the core studio staff being at hand for 38 hours per week.

Given the comparatively cheap nature of studio-based/location (news/magazine style) television production, it is envisaged the output capacity would be in the realm of 20 hours per week without strain or significant additional cost implications and provides some economy of scale.

The operation of the Production Unit is set to modern efficient staffing standards. Given the need for training and staff development components automated operations such as unmanned remote controlled studio camera pedestals are not included in this model which is built around manual operation of studio based productions. That is, we have traded capital expenditure for operational expenditure.

Productions such as drama, reality shows, documentaries and sitcoms would realistically have to be outsourced, given the expected production hours set in the brief. At 100 to 200 hours per year, any attempt to produce these programs in-house would require significant setup investment and running costs and would substantially increase the overall cost of the broadcasting service.

We see this basic principle being applied by broadcasting services such as SBS TV, which produces a range or quality programs using its broadcast and studio facilities, but outsources production slates through SBS Independent.

However, a moderately-sized studio-based production facility is adequate for the production of a wide range of programs beyond the obvious ones such as news, current affairs and news analysis. These include children's programs, culturally-based music and arts programs as well as educational and information program initiatives. Combined with effective graphics and internet support, a wide spectrum of programs can be made at an acceptable cost, increasing the Production unit's efficiency.

Outsourcing (of dramas, sitcoms etc) adds to the efficiency by enabling the production unit to respond to new timeframes and project initiatives, and to adjust to changes in philosophy and budgets at any stage. There are no cost benefits, branding or commercial advantages in undertaking these productions in-house until the number of production hours rises to a significant volume.

2.8 The news model

This model is based on several assumptions:

- that the program will go to air each evening, but could be pre-recorded;
- that the program will screen 46 weeks per annum; (the Journalists Award provides for six weeks annual leave);
- that staff will be a balanced mix of entry-level grades and more experienced personnel;
- that a recognised element of training is incorporated within the staff structure as noted in the introduction;
- that content will be a mix of daily news, interviews and features;
- that the bulletin will contain 15 minutes of hard news each night, complete stories and reports, with the remaining time being taken up with sport, weather and a feature story;
- that a large core component of national and international news will be acquired from an external source. That is, a network-based broadcaster or a news agency;
- that there will be a limited amount of off-base content acquisition; and
- that basic national weather reporting will be augmented by emergency reports for cyclones, floods and fires in remote or regional areas as a part of the overall service.

2.8.1 Staffing for basic news service—18 staff

- Director of news;
- Studio director;
- Producer (Chief of Staff);
- Associate producer (junior);
- Three news assistants (trainees);
- Five reporters;
- Five camera/editors;
- Presenter; and
- A team of five journalists—two senior journalists, one journalist and two cadets/juniors.

It is envisaged these editors will also do basic graphic work—that is, news story backdrops, opening titles and playoffs working off pre-set templates. Given the effective flexibility of "standard" equipment and software available to editing stations (significantly reduced costs and significant increase in flexibility and performance/effects) a trend is developing to take this function away from specialist areas such as dedicated graphics stations and operators and is incorporated into this model.

A producer (with a Chief of Staff role) with an associate (junior) producer/assistant trainee will head the daily team reporting to the News Director. A main on-air presenter will be supported by the journalists in the daily presentation.

A director (studio) would be a separate position to allow graphics preparation during the day (sport, weather) and provide a training and development role. The director would control the studio during recording/live production. This will also allow a slight overhead to incorporate additional programs such as current affairs with the minimum of disruption to the overall news team.

A Production Unit would need to be seen to have national relevance. The suggested model allows for two crews (each consisting of a reporter and an editor) to be stationed off-base. Alternatively, the cost of around $120,000 per annum of funding two crews (one camera/editor[4] @ $45,000, one reporter @ $45,000 two allowances @ $15,000 x 2 = $30,000) could be spent on acquiring stories from a number of stringers instead. This could substantially increase the national reach of the production unit.

A modern production kit and approach

The camera/editing kits, as described, make it possible to acquire and process news material without recourse to any other facility. Each complete kit costs $90,000, and can be utilised for several other specific needs. An example could be viewed in the following comparison for two current affair kits as itemised below.

Camera/Edit kit	In the style of	example a	example b
Camera		$25,000	$35,000
Disk back		$6,000	$6,000
Additional/special lens	wide angle	$0	$17,000
Lighting kit	Red Heads	$4,000	$6,000
Microphone kit		$4,000	$5,000
Tripod	Miller	$4,000	$6,000
Edit computer	G5Mac	$4,000	$4,000
Interface; input / output		$5,000	$5,000
Disk storage		$25,000	$0
Monitoring video/audio		$5,000	$3,000
Editing software	final cut pro	$3,000	$3,000
Special effects software	after effects	$1,000	$0
Total kit cost		**$86,000**	**$90,000**

In example (a), a major cost component is in disk storage and monitoring gear with adequate standard camera and lights. In example (b), we focus on higher quality in the front-end field content acquisition: that is, camera, lens, tripod, mikes and lighting. There is no additional storage required for the post production disk storage, as it can be shared with the first kit. Some jobs will require enhanced front end acquisition, but not all. This solution enhances flexibility and versatility and provides the best possible approach to each production unit's requirements.

The concept also allows for easy budget projections and project costings as each module can be added to the costs of the basic facility to get a real reference to current and future production undertakings.

From this overall news base, with training, development and overheads built in, a modular approach can be applied to enhance program output options for increased services such as sports round-up, news analysis, news briefs and weather updates. This approach maintains the efficiency and versatility of each unit, while allowing sharing of core functionalities such as production software, administration and general facilities.

2.9 Studio operations of the selected model

A studio with a small permanent crew is to be on-call for 38 hours per week. Reasonable efficiency will allow for 20 hours of production per week, based on the assumption that five hours per week of product will be "live" or "live to tape", as are news and current affairs programs. A studio of around 120–150 square metres can readily accommodate three semi-permanent sets (that is, set up most of the time, but that can be moved out to accommodate larger sets when required for the short term).

A smaller studio would require more handling of sets, and would lose efficiency when dealing with different programs. A larger studio would require a significant increase in capital, and would incur higher running costs.

A "hosting" set, used, for example, for an arts show, can be effectively made with a couch, a coffee table, an easel or other support featuring a piece of art, and some pot plants or other backdrops added. This allows for an easy and fast setup for an acceptable on-air look and eliminates major cost outlays for extensive studio sets.

2.9.1 Studio floor

In our model, on the studio floor there are three cameras with mobile gas pedestals, two of them fitted with autocue, plus two monitors.

There are also three semi-permanent sets, for example, for news, sports and weather, current affairs and children's programs.

The studio is fitted with cool lights. This significantly reduces operating costs such as large air-conditioning plants and lighting grid infrastructure (heavy duty lighting faders). The studio is geared to manual operation—that is., there are no remote controlled, programmed cameras on robotic gas pedestals.

The studio could be supplemented by a basic fixed single-camera announcer station for newsbreaks. A slightly more complex option is provided below.

This facility is completed by an external audio booth, available to all production areas for voice and announcer recordings going straight to disk storage and accessible on a router from any production area.

2.9.2 Staffing for studio component

Given its size and purpose, the studio could be staffed along the following lines:

- Three camera operators, one of them a senior operator with floor manager and supervisor duties, and two juniors;
- one audio operator, who could also play a support role to the floor crew when necessary. Often this will not be required, as small three-camera studios can have one camera locked off;
- one facilities/unit manager; and
- one administration assistant.

2.9.3 Master control

Even though no transmission facility is attached to this model, there is still a requirement for a facility able to link the production and post production facilities both between themselves and to external inputs and outputs.

Also, a tape material input and output stage would be integral to this facility. This would be equipped with a small number of broadcast tape machines in a range of professional and other acceptable formats. Any incoming material on tape would be digitised on the server and available to all production areas as required. Any production unit wishing to master material to tape can readily perform that function through this integrated master control facility.

A single point of tape handling requires an absolute minimum of equipment. Output would be simultaneously converted to web output and broadcast signal and sent out via internet or broadcast fibre to the transmission facility, whether next door or across the country.

The integrated master control facility would also house the traditional presentation output for live shows such as news, with an output switcher with bug and watermark facilities for image branding and identification, and main computing services. Web streaming, Internet web site maintenance and development as well as material input capabilities would be situated here. A tape machine rack with record and play-out functions would allow for program mastering and digitising of material sent in by industry videotape formats. Note that this model, relying on digital mass storage, does away with the traditional, separately managed and staffed Videotapes area for dubbing and play-out.

The staffing for this facility would be:

- one senior computer manager supported by
- two junior computer technicians/web developers.

An advanced graphics workstation with two graphic artists would support web and program post production, while news staff through their production software would prepare the text (and/or video streams depending on requirements and setup) for daily updates and postings. This software provides full capacity for automated and integrated autocue output to studio floor and studio control room.

Therefore, the total basic studio floor and integrated master control staffing is made of 13 individuals, including local management. This set-up can do all studio production and prepare it for any output. It can master on videotape or on disk (CD, DVD, VCD and similar). There is also an option to deliver to the Internet, to terrestrial broadcast or satellite transmission. The master control unit is connected to, and works with, each production area. In turn, each production area can work independently as required providing the level of flexibility required by a modern production facility.

2.10 Optional extras

2.10.1 Second studio

A second, much smaller "talking head" studio can be readily set up with minimum expense (Technical ~ $10k to $20k). This is a basic set-up for flat backdrops, chroma key and virtual set enhancements. It requires only one camera, and simple microphone arrangements—automated and switched via news or presentation. Quality output for news briefs, weather updates or general presentations can be undertaken with little set-up and minimum crew requirements. As and when studio production reaches capacity, (that is, more than 25 hours per week), it would be optional to free main studio production. No additional staffing would be required for this facility as the simple and largely fixed operation lends itself to operation by production department assistants, and can be switched via Master Control.

2.10.2 Weekly half hour News Analysis program

This would be a wrap-up of the week's important news and leads from the daily reports presented and filmed that week. The studio does not require any changes: except for a backdrop and or desk, the other facilities are in place. This can be recorded at any stage: it would not be subject to timing constraints, as a daily news program is. The majority of content will have been recorded when undertaking the original news story.

An option of including an additional camera/editor would require, in addition:

- One senior/political reporter, also presenter;
- One researcher/assistant;
- Camera/editor;
- Camera/edit basic kit; and
- Car.

2.10.3 Weekly half hour Sports Round-up

The majority of content could be derived from the previous week or weekend's stories. This program utilises all common components from the basic news service.

An option of including an additional camera/editor would require, in addition:

- A senior sports journalist, also presenter;
- Researcher / assistant;
- Camera/editor;
- Camera/edit basic kit; and
- Car.

2.10.4 Weekly half to one hour Current Affairs program

As much of the content will have to be acquired first-hand, only the more general central facilities from the news program can be utilised, and most of the requirements will be in obtaining "new" material. Administration support, computers and production software could be shared.[5] Additional staffing requirements:

- Current affairs producer (probably presenter as well);
- Two crews—senior journalists and camera/editors;
- 2 researchers / assistants;
- 2 motor vehicles;
- 2 camera/edit kits; and
- Presenter.

2.11 The Program Unit—commissioned work

Two commissioning editors and administration assistants would provide a stable and adequate base for the department heads to maintain the direction and continue development of television productions in accordance with the governing body's instructions.

A chief financial officer with two assistants, along with a receptionist and an HR manager, would complete the team.

2.11.1 The administration structure

The final structure of the Production Unit could be summarised as follows:

- CEO
- Commissioning Editors
- Department Heads (Executive Producers)
- Finance
- News
  - Producer News and Weather
  - Producer Sport
  - Producer News Analysis
  - Producer Current Affairs
- Drama
- Education and Information
- Children's Programming
  - Producer: Children's Program
- Drama
- Documentaries
- Language and Culture
- Producer: Arts Show
- Producer: Music Show
- Facility Manager
  - Computer Manager

3. Transmission for an Indigenous broadcasting service

3.1 Introduction

There are a number of approaches to transmission that could be adopted by an Indigenous broadcasting service:

(a) stand-alone—the service has a complete distribution system to deliver services to digital terrestrial transmitters and a separate service to deliver to satellite homes and analogue terrestrial transmitters (including BRACS and self-help sites). This is a service comparable to SBS. There is a potential option for this service to be delivered as a single direct to home satellite feed and retransmitted both digitally and in analog;

(b) national satellite with time delay—this service could be used for both analogue and digital retransmission. However, it would require additional capital equipment at each digital transmission site to be implemented;

(c) multi-channel with national broadcaster—the main output of the master control room would be linked to the national broadcaster with a telecommunications link and the time delay facilities would be located at the national broadcaster's premises.

3.2 Introduction to satellite services

3.2.1 Nature of satellite services

Satellites used for the delivery of television services are "geosynchronous". That is, they always appear to be in the same point in the sky. Geosynchronous satellites achieve this because they orbit the earth in a period of 24 hours. This is the same time that it takes for the earth to spin on its axis.

The geosynchronous orbit is 36,000 kilometres above the earth and geosynchronous satellites orbit directly over the equator. Each satellite occupies a particular location in orbit, and operates at a particular frequency. The position of a satellite can be identified by providing the longitude of the satellite. This is a shorthand way of saying that the satellite is located in 36,000 kilometres over the equator at that longitude. For example, the satellite that is used to deliver FOXTEL services in Australia is said to be at a longitude

of "156.0°E". That is, the satellite is 36,000 kilometres above the equator at a longitude of 156.0°E or about 6° North of Bougainville Island.

The fact that communications satellites are fixed in geosynchronous orbit, staying in the same position above the ground at all times, allows satellite antennas that transmit or receive signals to be pointed towards an orbiting satellite and left in a fixed position. This means in practical terms that a satellite dish intended to receive satellite-delivered television services need not be re-pointed once it has been initially correctly installed.

3.2.2 Delivering broadcasting services

Providers of satellite-delivered television services procure the delivery of their services to a satellite. They may own the satellite or lease space on it. The process of delivering the service to the satellite is known as uplinking. A particular television service may be combined with other television services before it is uplinked. This combining of services is known as multiplexing. The service is often scrambled, or encrypted, to prevent unauthorised reception and this can occur before or during the multiplexing process.

The uplinked signals are received by a transponder located on the satellite. A transponder is a device that receives the signals and transmits them back to the earth after converting them to a frequency that can be received by an earth-based antenna. Typically there are 15 to 45 transponders on each satellite. In order to minimise interference between the transponders, the signals are transmitted with alternately polarised antennas.

The signals received at the satellite from a ground-based antenna are extremely weak. As a result, transponders include amplifiers that boost the signals to a level that can successfully be processed and retransmitted to the earth. The process of transmitting a signal from a satellite to the earth is known as downlinking.

The downlinked signal is at a very low power when it reaches the earth. A typical transponder, for example, has the same power as a 100-Watt light globe. After travelling 36,000 kilometres to a ground-based television antenna, the signals are again very weak and must be amplified.

3.2.3 Reception

A satellite receiving system uses a satellite dish to focus the downlinked signals onto a single point where the antenna is located. The signals from the antenna are then fed to a "low-noise block down-converter" (LNB), which amplifies the signal and converts it to a lower frequency. The lower the power of the satellite, the larger the antenna required to focus the signals. The signals from the LNB are fed to a set-top box, which converts them to a form that can be tuned by a television set. This conversion includes descrambling or decryption if the received signal is scrambled or encrypted.

A high-powered satellite, designed to deliver television services, with a power of 100 to 200 watts per transponder, only requires a satellite dish of 65 cm in diameter. A 65 cm diameter satellite dish is the most common size of satellite dish in domestic use in Australia.

3.3 Orbital slots used

Examples of satellites latitudes for satellites covering in Australia are:

- 152° East—Optus B3
- 156° East—Optus C1
- 166° East—PanAmSat 8
- 169° East—PanAmSat 2
- 95° East—NSS-6.

3.4 Satellites used

The satellite that is currently used for the delivery of pay television services in Australia is the Optus C1 satellite at 156o east. This satellite has 20 transponders which are capable of delivering services into a small (less than 1 metre diameter) dish across most of Australia. C1 is also used to provide services on the Optus "Aurora" platform. This platform is used for the delivery of the remote area broadcasting services (ABC, SBS, WIN, QQQ and Imparja). It is also used for the delivery of other non-broadcast television services, audio services and data services.

3.5 Transponder channel capacity

Each digital transponder will deliver close to 60 Mbit/s total data rate. This is not however the useful data rate, just under 2/3 or ¾ of the 60 Mbit/s is real data. The rest is the error protection and safety data needed to ensure that the actual user data gets through completely error free. As such, each pay TV transponder actually delivers around 38 Mbit/s of real data (including necessary "overhead" data such as system information and conditional access). With each standard definition pay television service running at 3 to 3.5M bit/s there are 10 to 12 television services in each transponder. 3 to 3.5 Mbit/s will give poor but adequate standard definition quality for "themed" pay TV services. Free to air broadcasters generally regard 4 Mbit/s as the lowest rate acceptable to match the current PAL analogue broadcast quality.

3.6 The C1 satellite

The C1 satellite has eighteen 36 MHz transponders and is the satellite used to deliver FOXTEL and Austar. It is the satellite to which substantially all receive only dishes in Australia point. However, C1 is more than "full" and could not be used for the delivery of an Indigenous broadcasting service direct to homes. By 2006, Optus intends to add capacity at the 156 orbital slot by launching one of the "D" series satellites.

3.7 Time delay

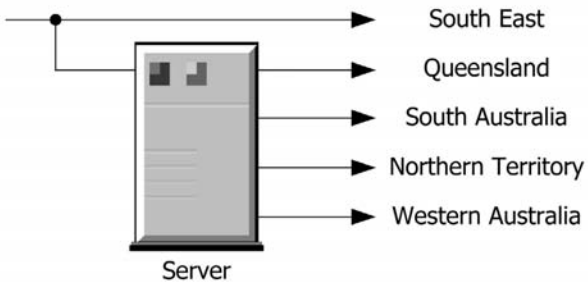
The use of video servers in multi-channel television operations has accelerated dramatically in recent years. The move to file-based storage and management of media has increased accordingly. Facility architectures based on video servers, along with file-based media management, offer a number of clear advantages over traditional tape-based operations. Those advantages include improved workflow efficiencies, decreased operating expenses, and more programming options. In fact, most, if not all, new facilities being built today will be all digital and tapeless, and many existing facilities, rushing to keep up, are in the process of transitioning their current operations in the same way.

These types of server can be used to implement a time zone delay. Typically, such devices can handle four inputs and outputs. If the assumption is made that there are five time zones in Australia:

- South East;
- Queensland;
- South Australia;
- Northern Territory; and
- Western Australia,

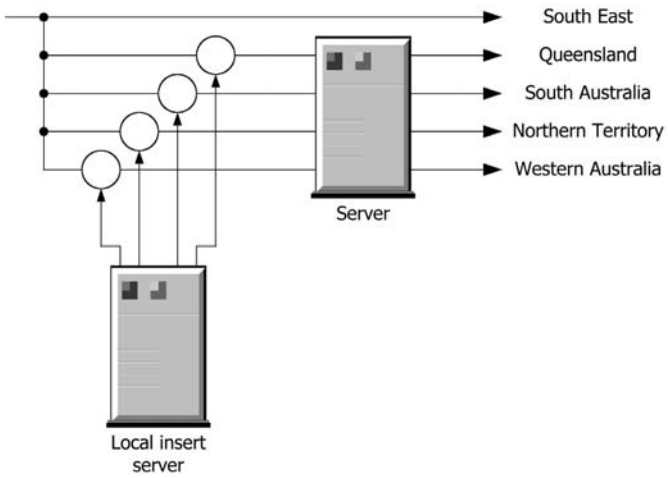
then four outputs will be sufficient based on an original South East service. This is shown in Figure 2—Server-based time delay over the page.

Figure 2 – Server-based time delay



It would be feasible to carry national interstitials (promotions and advertisements) on such a server arrangement. This would mean that all promotions and advertisements would need to be relevant to a national audience. It would also be possible to add local insertion for each of the time-zones. That is, different promotions and interstitials could be inserted for different regional audiences. This is shown in Figure 3—Local insertion of interstitials below.

Figure 3 – Local insertion of interstitials



The capital cost of a time delay and local insertion server as set out in Figure 3—Local insertion of interstitials above would be approximately $400,000.

3.8 Terrestrial

Reception

The delivery of the service can take place by satellite. However, once the service is delivered, there is an issue as to how it is retransmitted. Clearly, the satellite can deliver the service to transmission sites around the country or, indeed, direct to a home or community which has appropriate satellite reception capability. In regional and metropolitan areas, it would be feasible for the Government to take a policy decision that it would deliver the service either as a multi channel to an existing digital terrestrial service or using a dedicated channel. The use of a dedicated channel would require a significant policy shift as the ABA has planned for five channels in all areas and two channels have been set aside for datacasting services in at least the major metropolitan and regional centres. In addition, in most metropolitan areas, each of the channels is also translated to provide adequate geographic coverage. This means that there is no capacity available in most areas other than the channels currently reserved for datacasting. Clearly, it would be feasible to change the allocation of these channels to an Indigenous broadcasting service. However, this would represent a significant change in the regulatory framework expected by broadcasters.

It would be feasible to use some of the spectrum currently allocated to either ABC or SBS to deliver an Indigenous broadcasting service as a multi-channel. The requirement would be a satellite receiver and a device for remapping the service information association with satellite transmission to that associated with terrestrial transmission prior to remultiplexing the Indigenous broadcasting service with the existing ABC or SBS services.

That is, a cost of approximately $40,000 per receive site in capital expenditure and then an additional rental cost for co-location space from Broadcast Australia in the order of a few thousand dollars per year. There would be associated operations and maintenance and a sensible estimate for this would be 5% of the capital cost per year.

Unfortunately, this solution does not help at the many BRACS and self-help sites which would be particularly interested in the Indigenous television service. A typical BRACS installation originally cost between $30,000 and $40,000 and provides for the transmission of the ABC, Imparja and sometimes SBS and a second commercial service. The additional cost of a service information translation device and a digital transmitter would tend towards the original cost of the BRACS installation.

This suggests that a low cost option would be to have a domestic grade satellite receiver feeding directly into a low power UHF transmitter in the same way as the existing BRACS sites work in respect of ABC and Imparja. The incremental cost of such a system would be less than $4,000.

There is a risk that the only cost effective way of delivering an Indigenous broadcasting service into the remote parts of Australia and into Indigenous communities effectively locks the technology into one which is not being used in the rest of Australia. The risk of a stranded analogue technology in a digital television Australia is significant and one which will require policy thought (and substantial Government expenditure) depending on the submissions received in the current enquiry.

3.9 Transmission costs

The cost of satellite capacity in Australia varies from about AU$ 3 million per year for capacity on the NSS-6 satellite to about AU$ 5 million per transponder per year for Optus satellite capacity. However, as set out above, capacity is limited on the Optus C1 satellite and the Optus B3 satellite does not deliver services into small dishes across the whole of Australia. Optus proposes to launch new satellites in 2005 and 2006 and it is anticipated that this series of satellites (the D series) will have capacity across the whole of Australia into small dishes. That is, they will have a configuration not dissimilar to that in the C1 satellite.

Many satellite operators also offer "managed services". Typically, a managed service will deliver a complete digital video and associated audios stream that is delivered to its facility at a capital city. Optus' Aurora service, which is used for the delivery of remote area broadcasting services, is an example of such a service.

A single 36 MHz wide transponder can be used to deliver a service of 38 Mbit per second. In the world of pay television, this represents ten or eleven channels. More typically in commercial broadcasting this capacity is used to deliver approximately nine channels (in the case of regional broadcasters) or six channels in the case of metropolitan broadcasters. The average megabit per channel determines the viewer perception of quality.

Typical costs for a managed service are approximately $800,000 per video channel per year. This contrasts with the requirement for capital expenditure of $60,000 per service plus uplinking charges of $120,000 per year plus the transponder costs that would be required for a self delivered service.

The costings in this section assume that uplinking and program origination are in Sydney. If the program origination were to be elsewhere, there would be an additional cost of a contribution feed. This could be implemented using satellite or fibre optic technology but would add an additional cost of at least $500,000 per year assuming that an appropriate uplinking facility was in the program origination location.

3.10 Summarising the costs

3.10.1 Stand-alone service

The stand-alone service consists of two parts:

(a) delivery to the satellite; and

(b) transmission:

(i) digital; or

(ii) analogue.

These are set out in the figures below:

Figure 4 – Delivery to the satellite

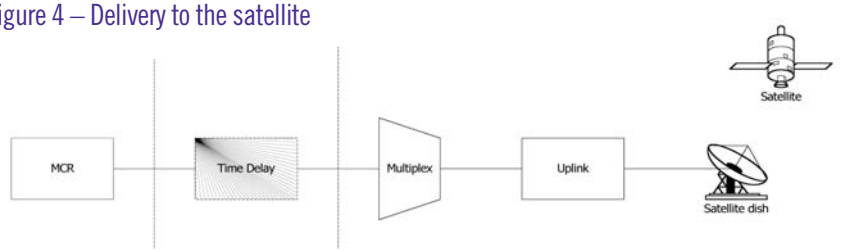


Figure 5 – Digital terrestrial transmission

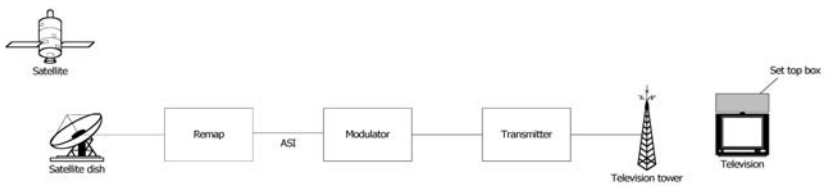
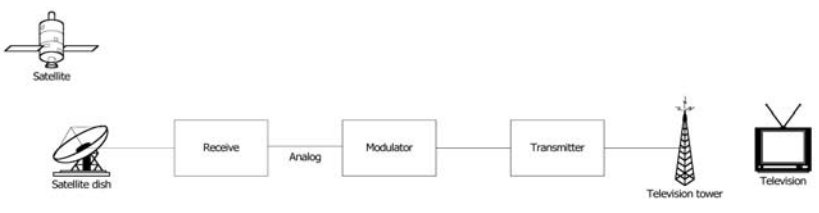


Figure 6 – Analogue terrestrial transmission



A useful basis for estimating the cost of transmission is provided by SBS' reported transmission costs. In a presentation to shareholders of Macquarie Communications Infrastructure Group, SBS reported that there is an implied long-term digital cost of transmission (that is from transmission sites and not including satellite feed) of about $20 million per year. This figure is consistent with the forward looking commitments in respect of transmission reported by SBS in its 2003 annual report. This figure is $584 million. If we assume that this represents digital transmission for 15 years and analogue transmission for 10 years and that digital transmission is the same as the cost of analogue (despite the lower electricity costs) then the annual transmission cost for digital is $23.4 million per year. In practice, the lower electricity costs make $20 million a reasonable assumption. On the other hand, if the cost is $23.4 million and this includes a high level of redundancy to ensure availability, then $20 million is still supportable.

In addition, SBS will have:

- contribution satellite transponder costs of approximately $3 million per year; and
- distribution satellite costs of approximately $3 million per year.

The satellite costs include all uplinking and managed multiplex services. However, there would be additional capital expenditure involved to ensure a time delay service as set out in the transmission section above. That is, there would be a capital expenditure of $400,000 to provide time delay for four feeds and local insertion in any one of the five feeds supplied nationally.

Option cost—$26 million per year plus capital expenditure of $400,000

A variation on this cost would be a nationally delivered satellite service with no time delay that could be used for a direct to home service and for retransmission in analogue and digital terrestrial. This would have a satellite managed services cost of about $800,000 per year and would require capital expenditure of $40,000 at each digital transmission site for remapping of the satellite information to terrestrial information. Assuming that there are 80 digital transmission sites, then the variant would cost $20.8 million per year plus capital expenditure of $3,200,000.

3.10.2 National satellite with time-delay

This would use the same approach as set out above, but assumes that the transmission sites will re-configure the digital service from a satellite one to a digital terrestrial one. The effect of this is to reduce the satellite costs to a single distribution feed of $3 million per year and the same transmission cost of $20 million per year. There would be increased capital expenditure of $40,000 at each of 80 digital transmission sites or $3,200,000.

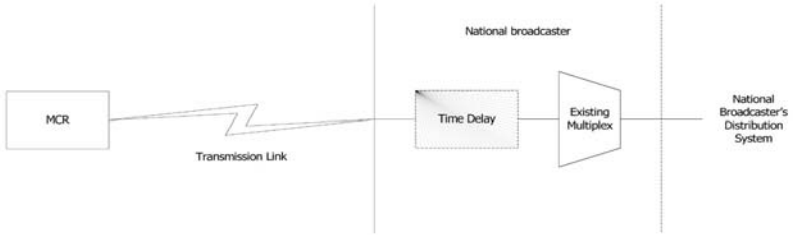
There would be a capital expenditure of $400,000 to provide time delay for four feeds and local insertion in any one of the five feed supplied nationally.

Option cost—$23 million per year plus capital expenditure of $3,600,000.

3.10.3 Multi-channel with national broadcaster

This approach is set out in Figure 7—multi-channel arrangement below.

Figure 7 – multi-channel arrangement



Both the ABC and SBS have an existing transmission facility which provides for the delivery of the complete multiplex of its services. That is, the distribution system delivers approximately 20 megabits per second, which represents the usable payload of a digital television service. This payload can be configured to be a combination of high definition and standard definition channels along with associated enhancements and data casting.

If an existing multi-channel were to be offered by either ABC or SBS then the additional cost of delivering an Indigenous programming service to an existing time zone would simply be the cost of time delay for the Indigenous broadcasting service and the cost of a telecommunications link between the master control room of the Indigenous production unit and the relevant central distribution point of either ABC or SBS (that is, either Ultimo or St Leonards in Sydney). Although both ABC and SBS perform time delay currently, the option would still require equipment to of $400,000 to provide time delay for four feeds and local insertion in any one of the five feeds supplied nationally.

Option cost—$100,000 per year plus capital expenditure of $400,000

4. National broadcasters

4.1 Introduction

As discussed above, the option of delivering an Indigenous programming service using an existing multi-channel offered by either the ABC or SBS would be less costly than a stand-alone service. There are two potential models for integration:

(a) a separate and independent Indigenous programming unit that shares the national broadcaster's administrative functions; or

(b) complete integration with an assumption of synergies from existing infrastructure.

However, the associated cost savings may be restricted by the position of the national broadcasters that there is no digital capacity available. Further, the synergy benefits of a fully integrated unit may not be fully achievable as each of the broadcasters is using its existing capacity.

4.2 Integrating with a national broadcaster

The cost of an independent facility, compared with the other two models, is as follows:

	Independent	Separate	Integrated
Total Capital Expenditure	$4,387,000	$4,387,000	$2,289,000
Staffing Costs total	$3,880,000	$3,574,000	$2,979,000
Total Running Costs	**$1,790,650**	**$1,590,650**	**$1,090,650**

4.3 Separate unit

A separate unit would reduce the administrative costs and the costs of a news feed (reduction of running costs by $200,000 per year). The staff costs would be reduced as follows:

Management and Commissioning Unit	Staff	Salary	Separate model	Staff	Salary
Commissioning Editors @ $85,000	2	$170,000	No change	2	$170,000
Senior Producers @ $85,000	5	$425,000	No change	5	$425,000
Admin assistants @ $35,000	5	$175,000	No change	5	$175,000
CEO	1	$200,000	Head of Dept	1	$120,000
Financial Controller	1	$85,000	Accountant	1	$55,000
HR Manager	1	$85,000	Not required	0	$0
Finance assistants @ $38,000	2	$76,000	Not required	0	$0
Receptionist	1	$35,000	Not required	0	0
Total Management staffing	**18**	**$1,251,000**		**14**	**$945,000**

4.4 Integrated unit

An integrated unit model would result in significant cost savings, assuming that the partner is a major commercial network or the ABC or SBS TV and has studio, MCR and computer facilities.

Capital expenditure - Technical facilities	Cost	Integrated Model	Cost
Studio floor / studio control and supports (audio)	$1,200,000	Not required	$0
Presentation Output (switchers; watermark, bug keyers)	$150,000	reduced	$45,000
Computers/servers/software for Web readiness	$185,000	add on components	$100,000
Technical vehicle	$38,000	not required	$38,000
Injest - Mastering (professional, broadcast machines)		not required	
Tape machine DVcam	$44,000	not required	$0
DV Pro	$58,000	not required	$0
Digital Beta	$85,000	not required	$0
Distribution amps/ monitoring stations / internal switching	$185,000	reduced	$45,000
Technical Installation	$120,000	reduced	$20,000
Specialised Studio Construction (precision floor, building)	$195,000	not required	$0
Plant equip specialised Studio air conditioner	$28,000	not required	$0
Diesel generator	$42,000	not required	$0
UPS power support	$16,000	not required	$0
Total capital expenditure Technical Facility	**$2,346,000**	-	**$248,000**

The Management and Commissioning Unit capital expenditure would realise little change. The significant items are still required, and the only savings would be effective in the general administration areas of phone systems and bulk fax/photocopier supply contracts.

The other individual components for each programming area would see little change. There exists some potential for savings in areas such as news, because an existing news service will have a wide range of common components to draw on. However, these issues are not guaranteed and are minor to the overall requirements. Therefore, these will not be highlighted for this comparison. The significant news capital expenditure lies with the field and editing equipment. Savings of bulk supply deals would come into play, but the overall effectiveness would be dependent upon overall network selection or existing contracts. As this cannot be determined, again, these costs will remain static.

The same applies to the other programming departments. The equipment requirements and costs remain static.

Capital expenditure overall comparison:

Capital expenditure summary	Independent	Integrated Model	Cost
Technical facilities Studio / MCR	$2,346,000		$248,000
Management and Commissioning unit	$210,000	No change	$210,000
News & weather, Analysis, Sports Round-up,	$1,151,000	No change	$1,151,000
Current Affairs	$266,000	No change	$266,000
Children's	$138,000	No change	$138,000
Arts	$138,000	No change	$138,000
Music	$138,000	No change	$138,000
Total capital expenditure	**$4,387,000**		**$2,289,000**

Staffing structure and costs

There will be significant changes as the Technical Facility is not required. The management structure will change as it is no longer an individual entity, but could well be an individual department within an existing network such as the ABC or the SBS services.

A partnership with a commercial network would not have the significance of the change in management structure.

Management structure comparison

Management and Commissioning Unit	Staff	Salary	Integrated model	Staff	Salary
Commissioning Editors @ $85,000	2	$170,000	No change	2	$170,000
Senior Producers @ $85,000	5	$425,000	No change	5	$425,000
Admin assistants @ $35,000	5	$175,000	No change	5	$175,000
CEO	1	$200,000	Head of Dept	1	$120,000
Financial Controller	1	$85,000	Accountant	1	$55,000
HR Manager	1	$85,000	Not required	0	$0
Finance assistants @ $38,000	2	$76,000	Not required	0	$0
Receptionist	1	$35,000	Not required	0	0
Total Management staffing	**18**	**$1,251,000**		**14**	**$945,000**

With the exception of the loss of technical facilities staff, the other program departments remain unchanged. The overall comparison for staffing numbers and costs:

Staffing costs summary	Staff	Salary	Integrated Model	Staff	Salary
Technical facilities Studio / MCR	13	$595,000	Not required	0	$0
Management and Commissioning Unit	18	$1,251,000	Change	14	$945,000
News & weather, News analysis, Sports Round-up,	24	$1,146,000	No change	24	$1,146,000
Current Affairs	7	$366,000	No change	7	$366,000
Children's	4	$174,000	No change	4	$174,000
Arts	4	$174,000	No change	4	$174,000
Music	4	$174,000	No change	4	$174,000
Staffing Costs total	74	$3,880,000		57	$2,979,000

Running Costs

The running costs of each programming department will vary little. The programs will be made the same and have the same production equipment. It is the studio components that change and would be substituted for a departmental charge and be based on actual costs. The savings will follow the elimination of the studio/MCR facility and with the running costs of the Management and Commissioning Unit.

Running Costs summary	Cost	Integrated Model	Cost
Technical facilities Studio / MAR	$378,000	Not required	$0
Management and Commissioning unit	$430,000	Reduction	$308,000
News & weather, News analysis, Sports Round-up,	$560,300	Reduction	$360,300*
Current Affairs	$172,400	No change	$172,400
Children's	$80,650	No change	$80,650
Arts	$84,650	No change	$84,650
Music	$84,650	No change	$84,650
Total Running Costs	$1,790,650		$1,090,650

* It is expected that network supply of base news content will not be required in the form costed for and will be eliminated. It is this expected approach that has been costed. All other news costs remain static, as with the other programming departments. Therefore news running costs reduced by $200,000

The other changes effect the Management and Commissioning Unit:

Running costs Management and Commissioning Unit	Cost	Integrated Model	Cost
Travel / conferences / film shows	$80,000	No change	$80,000
Contracted Legal services	$80,000	Reduced	$40,000
Office expenses	$30,000		$20,000
Rent for 600 sqm @ $400 pa/sqm (inc program departments)	$240,000	@ 70%	$168,000
Total running costs - Management and Commissioning Unit	$430,000		$308,000

A major network would have common legal services and as the staffing is reduced, so the overall running expenses are also reduced.

5. Costs for genres

5.1 Costs of Australian television production by genres

There is no direct reference to a comparison of television production between different producers. Each production, its value, its quality, its style will be as different as each production's target audience, budget and potential financial return or creative merit.

In broad terms for example, documentaries—aired on commercial networks, have run from $5,000 per hour through to a $1,000,000 per hour. A better gauge and industry evaluation of quality, both technical and editorial, is borne out through looking at averages of industry wide examples and drawing conclusions and values relative to the expected costs for an industry standard reference. Most references from the institutions like ABS, AFC through to individual reference sources, provide ranges for costs of the differing types of television production are given as broad ranges. Most of these have a range of plus and minus 30% and is indicative of the near impossibility to refine the data for any type of direct comparison.

5.2 News and current affairs

The cost of news and current affairs programming varies significantly. Each broadcaster considers that the knowledge of its costs confers a significant commercial advantage. The following figures are indicative of the likely costs per hour:

Broadcaster	Cost per hour and rationale
ABC	$32,500 (as reported in 2002 annual report)
SBS	$32,500 (assumed to be the same as ABC)
Imparja	$4,000 based on current staffing levels and assuming that a national news feed from the networks is available. This is consistent with S4C incremental news costs
Commercial	$80,000 per hour based on number of hours per week, estimated rate card rate and an assumption that news and current affairs are no less profitable than average programming

5.3 Australian documentaries

The cost per hour of single title Australian documentaries is in the range of $300,000 to $500,000 per hour.

The average cost of documentaries produced in Australia has increased steadily over the last six years, with the exception of 1999/00 when it dropped marginally from the previous year. This has been attributed to the large number of series produced as a result of the additional funding (and increased productions), by the National Council for the Centenary of Federation that year.

Average cost of documentary production per hour: (Source Australian Film Commission)

1996/97	1997/98	1998/99	1999/00	2000/01
$248,937	$293,756	$331,854	$329,540	$374,064

An average of 46% of all productions (over the six year period) fell within the range of $200,000 to $500,000.

When specifically looking at all documentaries produced by the ABC and SBS television networks we see lower prices. SBS used to make in-house documentaries for an average cost of around $75,000 per hour.[6] However, current practice in SBS is to commission documentaries through SBS Independent. The costs for commissioned programming will be comparable to the costs incurred by other broadcasters.

Figures quoted in the same report indicate the same figure for ABC documentary productions ($75,000) and considerations should be afforded to this style of documentary. (It should also be noted that an "industry average" for this category was quoted at $70,000 per hour.)

It should also be noted that documentaries specifically made about Indigenous people, their land and culture will necessarily attract costs in the highest bracket of television documentary production. The nature and complexity of the culture itself often carries severe restrictions when organising specific filming. This combined with the logistic issues relating to remote area location filming creates considerable cost penalties when compared to a comparable mainstream production.

CAAMA quotes its present budget rates of $320,000 per hour for documentary production as a good indication of associated costs.

Therefore to maintain the industry averages and standards, it is realistic to budget between $300,000 and $500,000 per hour of documentary produced, for a Production Unit to produce comparable television products in the genre of Australian documentaries.

5.4 Australian adult drama

5.4.1 Miniseries

During the three years July 2000 through June 2003, six Australian mini series were produced. One third of these costs were in the range of $3m to $6m and the remaining two thirds were in the range of $6m to $10m.

Some of these series were: *After the Deluge* (CoxKnight Productions), *Jessica* (Screentime Pty Ltd), *Marking Time* (Southern Star Entertainment Pty Ltd), and *The Shark Net* (Taylor Media).(Source: Australian Film Commission)

5.4.2 Telemovies

Again, from the Australian Film Commission, we obtain figures to state that "the majority of Australian telemovies have remained in the $1-3 million range".

5.4.3 Series / serials

Less than $1m	$1–3m	$3–6m	$6–10m	$10–20m	More than $20m
15%	25%	7%	22%	31%	0%

CAAMA confirms that their costs for Australian drama are from around $570,000 for a half hour and around $900,000 for an hour. Network TEN noted, that although they have some daily series (of less than high-end quality) at around $150,000 per hour, the cost of producing serious drama starts at $400,000 per episode and goes upwards.

5.5 Children's drama

There is little difference in the costs and ranges for children's drama compared with adult drama. On exact figures, CAAMA have just undertaken a 13 part children's series for an average of $360,000 per hour. Network TEN reports that their current children's series under production—Fergus McPhail costs approximately $400,000 per half hour ($800,000 per hour).

5.6 Other television production

Reality shows are almost impossible to cost, other than to state that they are expensive. Given the cost for program concept and licensing arrangements, before such an undertaking is considered the commercial model of in-program advertising with guarantees for offsetting outlays begin. These are usually supported with massive internet and SMS services and the actual production costs become vague at best.

6. Capacity building

6.1 Capacity building

The significance and importance of training is well referred to in the Long and Cole report. Many references to the overall training plans for Radio, Corporate Administration and Television receive detail down to individual courses.

While it is outside the scope of this brief to develop and cost a complete training structure, several relevant suggestions have steered the staffing structure design for the costed model.

This has been predominantly deployed by utilising assistant and junior positions in each department. This overhead allows for gainful employment of individuals while gaining valuable expertise and on the job training. Importantly it facilitates for time off-station to attend courses and training modules as there is sufficient core and senior staff to handle critical functions.

Case study—children's program module

Staffing for this is a Producer/Presenter with a camera/edit position and two assistants.

By direct comparison, Imparja Television produces a children's program, Yamba's Playtime, scheduled half hour daily six days per week. This is a studio based program that contains inserted field trips and cartoons.

The staffing resources for this are one producer/suit actor and one presenter/assistant. Apart from one day's recording in the studio (to be cleared by 3.00 pm for news recordings), they have had an allocation of one day per week from a camera/edit staff member. This is a low-cost commercial model and has resulted in the show winning national awards for Environment Awareness and Educational program segments. They also manage to average two outside live performances per week.

The structure for the costed children's studio production unit will allow for the assistants to receive ample experience and development in all areas of studio production and administration including;

- Studio floor work, camera, floor managing;
- Director's assistant, computer graphic control and in program insertion, directing, vision switching;

- Location shooting, from camera and audio through to field set up and direction;
- Administration and basic budgeting; and
- Script writing, research.

The overhead allows for this flexibility and opportunity and is not often seen in established structures. Although not cheap for the first period, rewards will pay in the long run in many areas other than just the significant dollar value.

The suggested Indigenous broadcasting service's overall training is proposed to be significant and the production unit has been staffed to accommodate any training initiatives and the overhead allows for time off station to attend courses. As with the cadet journalists and assistants' roles structured for news, a direct partnership with an appropriate TAFE would also assist in the capacity building objectives.

7. Language issues—development and maintenance

From the feasibility study produced by Malcolm Long Associates and Owen Cole[7], "Indigenous people want an Indigenous broadcasting services TV to take a leading role in language maintenance and development". There are numerous other references to the importance of this concept for any an Indigenous broadcasting services development.

In principle the approach to production could be applied in any language. This is particularly the case once there has been a degree of capacity building among Indigenous language speaking staff. However, there are issues with the decision as to which language to use. The models proposed assume English as the language of broadcasting. Indeed, there is some contention that broadcasting cannot eliminate or even reduce language loss.

This contention is prompted by Fishman's scepticism concerning the role of the media in reversing language shift. In his original account of intergenerational language loss and the ways in which this might be reversed, the usefulness of the media is not only well behind the use of language in the home and community, but is also put behind such elements as education and the work sphere (Fishman 1991, p.395).[8] In his more recent writing he has noted that the media are more likely to interfere with mother-tongue transmission than support it, simply because of the greater quantity of media output in the dominant, majority language (Fishman 2001, p.473).[9] He has even referred critically to "the mass-media 'fetish' of some minority language activists" (Fishman 2001, p.482), noting how unrealistic their expectations of the media can be.[10]

Given that there is clearly a measure of controversy over language issues in media generally and Indigenous media specifically, we have assumed that the base programming model will use English only.

8. An Indigenous broadcasting service

The Production Unit described above is capable of producing about 14 hours of programming per week. In order to have a credible independent Indigenous broadcasting unit, it would necessary to produce a six hour wheel for at least five days a week with weekend repeats. The weekend repeats minimise the labour costs associated with the standard award premiums for weekend working. In order to move from 14 hours to 30 hours, additional programming would need to be acquired. One approach to this would be to assume that there were:

- four hours of drama per week (based on 100 original hours per year plus repeats);
- an infotainment/reality program envisaged to be shot in the studio facility but on a commissioned basis in early hours of each morning and with an assumed cost of $30,000 per hour;
- a one hour language and culture segment which is envisaged to be supported by a complete freelance crew travelling to communities and recording two half-hour segments in each of two communities. This is likely to have an overall cost of approximately $2 million per year assuming that there are two crews which are able to visit five communities each week. In practice, this is likely to be somewhat optimistic and it may be more realistic to assume that there are five crews each collecting two segments per week. This would give an annual cost of $3.3 million;
- acquisition of a library sitcom from ABC, SBS or commercial television with an assumed half-hour cost of $10,000.

If the drama production values are comparable to those of “Neighbours” then the drama acquisition cost would be $15 million, the infotainment cost would be $6.25 million and the total budget for external programming would be approximately $27 million per year.

Clearly it is questionable as to whether this is truly an equivalent of an SBS service. However, it is an ambitious challenge for an Indigenous broadcasting service when compared with, for example, Maori TV in New Zealand.

There are other models which use significantly higher levels of resources such as Welsh Channel 4 and the Basque television service. The amounts portrayed are for a low-cost Indigenous service more closely aligned with the Maori TV service in New Zealand. However, the programming would be substantially in English.

Transmission

It is useful to estimate the cost of transmission based on the SBS cost of transmission. In a presentation to shareholders of Macquarie Communications Infrastructure Group, there is an implied long-term digital cost of transmission (that is from transmission sites and not including satellite feed) of about $20 million per year. In addition, SBS will have:

- contribution of satellite transponder costs of approximately $3 million per year; and
- distribution satellite costs of approximately $4 million per year.

The satellite costs include all uplinking and managed multiplex services. However, there would be additional capital expenditure of $400,000 involved to ensure a time delay service as set out in the transmission section above.

Summary

The cost to operate an Indigenous broadcasting service comparable to SBS (but with substantially limited programming) would be approximately:

Capital expenditure: **$4,387,000 + $400,000 = $4,787,000**

Item	Cost
Production unit:	$5,670,650 per year
Commissioned programming	$27 million per year
Transmission:	$26 million per year
TOTAL	~ $59 million per year

9. NIBS update

We have not reviewed the likely costs of radio, online or existing media aspirants and do not think it is appropriate to include approximations in this report. Therefore, our comparison with the table of the NIBS report on page 77 is essentially a comparison of the basic television service using the 14 hours produced by the production unit and the optimal service which is the full six hours set out above and to allow a reasonable comparison, we have eliminated other numbers. This yields the following table:

Line item	NIBS basic TV		NIBS optimal TV	
	Original	Revised	Original	Revised
Total budget (paid transmission)	$37.68 million	$31.7 million	$47.81 million	$59 million
Total budget (via national broadcaster	$35.76 million	$5.67 million	$45.89 million	$33 million

The methodology used to arrive at the comparative figures was as follows:

We assumed that the cost of transmission from a national broadcaster would be zero and that the line items on page 77 of the NIBS report could be reduced. The original table was:

Item	Cost
Corporate costs (including training)	$1.74m
Radio costs	$7.07m
Television costs (basic)	$35.76m
Television costs (optimal)	$45.89m
Online costs (excluding tri-media news)	$1.10m
Existing media associations & aspirants	$11.91m
BRACS	$3.60m

The total of the non-television costs is $ 25.42 million leaving the television costs as:

Television (basic) $35.76m
Television (optimal) $45.89m

The second table in the NIBS report sets out the total budget:

Budget	NIBS with basic TV	NIBS with optimal TV
Total budget (paid transmission)	$62.87m	$73.00m
Total budget (via national broadcaster)	$60.95m	$71.08m

This implies that the assumed transmission cost for paid transmission is given by either:

(a) $62.87 – $60.95 = $1.92 million; or
(b) $73 – $71.08 = $1.92 million.

That is, Cole and Long assumed that paid transmission would cost $1.92 million. The original figures are then the figures for basic or optimal television with the transmission assumption added as required.

We then argued that the comparison with basic television is a comparison with the output of the studio based facility. That is, the comparison of Cole and Long's basic model is with the independent unit acquiring transmission on an ABC or SBS multi-channel.

The paid transmission figure uses the estimated transmission costs set out in section 3 and the optimal television comparison uses the programming costs set out in section 8.

Appendix 1—Detailed costings

Capital expenditure

The table below provides the cost of setting up the facility as optioned from the design:

Capital expenditure—summary	Cost
Technical facilities Studio / MCR	$2,346,000
Management and Commissioning unit	$210,000
News & weather, Analysis, Sports Round-up,	$1,151,000
Current Affairs	$266,000
Children's	$138,000
Arts	$138,000
Music	$138,000
Total capital expenditure	**$4,387,000**

Technical facilities

Capital expenditure—Technical facilities	Cost
Studio floor / studio control and supports (audio)	$1,200,000
Presentation Output (switchers; watermark, bug keyers)	$150,000
Computers/servers/software for Web readiness	$185,000
Technical vehicle	$38,000
Injest—Mastering (professional, B'cast machines)	
Tape machine DVcam	$44,000
DV Pro	$58,000
Digital Beta	$85,000

Capital expenditure—Technical facilities	Cost
Distribution amps/ monitoring stations / internal switching	$185,000
Technical Installation	$120,000
Specialised Studio Construction (precision floor, building)	$195,000
Plant equip specialised Studio air conditioner	$28,000
Diesel generator	$42,000
UPS power support	$16,000
Total capital expenditure Technical Facility	**$2,346,000**

The significant expense for the personnel in the commissioning unit is in the monitoring equipment, mainly for previewing submitted works.

Capital expenditure (management and commissioning unit)	Cost
Furniture and fit out	$40,000
Phone/voice mail system	$49,000
Administration equip, faxes photocopiers	$28,000
Computers, viewing VCRs and monitors	$55,000
Vehicle	$38,000
Total capital expenditure Management and Commissioning Unit	**$210,000**

Vehicles, field and editing gear along with a main server/play to air disk storage and play-out server comprise the bulk of the news room fit out.

Capital expenditure—News	Cost
5 field cameras and basic editing equipment @ $90,000	$450,000
Disk based storage/server/high speed network	$200,000
Computers and monitors	$20,000
Studio Set	$10,000
Newsroom fitout	$15,000
News vehicles @ $38,000 x 5	$190,000
News Analysis	
Vehicle	$38,000
Set	$5,000
Camera/edit kit	$90,000
Sports Round-up	
Vehicle	$38,000
Set	$5,000
Camera/edit kit	$90,000
Total News capital expenditure inc Sports Round-up, News Analysis	**$1,151,000**

Program modules from the chosen design model

These represent a standard kit of editing/field acquisition gear and a vehicle for the basic program modules and double that for the Current Affairs unit.

Current Affairs	Cost
2 motor vehicles @ $38,000	$76,000
Set	$10,000
2 camera/edit kits @ $90,000	$180,000
Total capital expenditure Current Affairs	**$266,000**

Program module—Children's	Cost
Vehicle	$38,000
Set	$5,000
Camera/edit kit	$90,000
Total capital expenditure program module—Children's	**$133,000**

Program module—Arts	Cost
Vehicle	$38,000
Set	$5,000
Camera/edit kit	$90,000
Total capital expenditure program module—Arts	**$133,000**

Program module—Music	Cost
Vehicle	$38,000
Set	$5,000
Camera/edit kit	$90,000
Total capital expenditure program module—Music	**$133,000**

Running operational costs

To operate the Indigenous Production Centre over a year, the following costs would be incurred:

Running Costs—Summary	Cost
Technical facilities Studio / MAR	$378,000
Management and Commissioning unit	$430,000
News & weather, News analysis, Sports Round-up,	$560,300
Current Affairs	$172,400
Children's	$80,650
Arts	$84,650
Music	$84,650
Total Running Costs	**$1,790,650**

Departmental breakdown

Technical Facilities of Studio / MCR and Studio Floor

Running costs—Technical facilities	Cost
Rent for 600 sum @ $400 pa/sum	$240,000
Office expenses for a 12 person facility	$25,000
Vehicle maintenance	$3,000
internet links (location dependent)	$45,000
Optical fibre links (location dependent)	$65,000
Total running costs—technical facilities	**$378,000**

The Management and Commissioning Unit

Running costs—Management and Commissioning Unit	Cost
Travel / conferences / film shows	$80,000
Contracted Legal services	$80,000
Office expenses	$30,000
Rent for 600 sqm @ $400 pa/sqm (inc program departments)	$240,000
Total running costs—Management and Commissioning Unit	**$430,000**

News including Sports Round-up and News Analysis

The newsroom computer system adopted for this study is an AAP/BBC's EMPS provided by Techtel and hooked up to a national network providing the bulk of national and international news. However, it could be also a self-contained facility if required.

The off-base allowance is for the crews working away from the main facility. Should the option of replacing off-base with stringers be adopted, this amount would require a separate budget allocation, leaving the grand totals unchanged.

Running costs—News, weather, sports and analysis	Cost
Network news base	$200,000
Newsroom computer system	$9,000
Minimal tape stock	$5,000
Bearer costs for remote urgent stories	$25,000
Advertising & Publicity	$20,000
Wardrobe, hair make-up	$12,000
Travel	$50,000
Motor vehicle running costs @ $6,000 x 5	$30,000
Off station allowance @ $15,000 / op / annum x 4	$60,000
Office material	$4,000
Phones, fax	$8,000

Running costs—News, weather, sports and analysis	Cost
Repairs and maintenance	$5,000
Cleaning	$3,000
Total—News running costs	$431,000
Sports Round-up	$64,650
News Analysis	$64,650
Total running cost—news, weather, sports and analysis	**$560,300**

The other studio based program departments

The support programs have their running costs valued against the basic news service for reference. The basic small production module program worked out to be 15% of the news costs and current affairs has been set higher at 40%, to accommodate a different operation. In addition, an allocation for extra components such as extra studio props, guest expenses and additional travel has been included to cater for the more specialised productions.

Children's Program	Cost
Running costs @15% of News	$64,650
Additional allocation for guests, props and demonstrations	$16,000
Total Running costs Children's program	**$80,650**

Arts Program	Cost
Running costs @15% of News	$64,650
Additional allocation for guests, props and demonstrations	$20,000
Total Running costs Arts program	**$84,650**

Music Program	Cost
Running costs @15% of News	$64,650
Additional allocation for guests, props and demonstrations	$20,000
Total Running costs Music program	**$84,650**

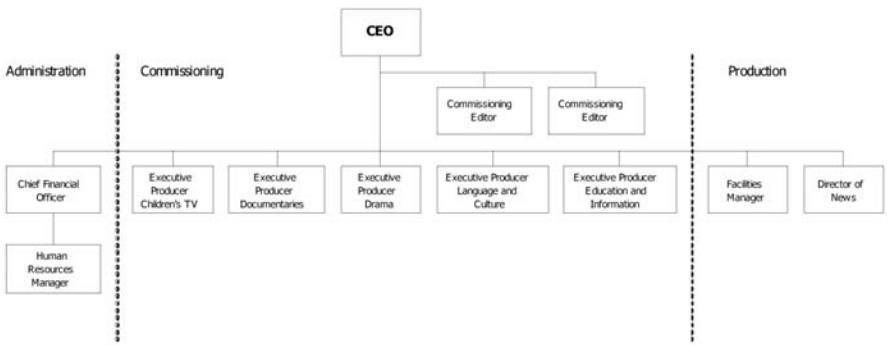
Staff costs

The designed model requires some 74 staff in total achieve the goals as indicated. Based on industry average wages and taking into account awards for television operational staff the cost for this arrangement will be in the vicinity of $3,880,000

Figure 8—Reporting summary, shows the functional and reporting structure of the National Indigenous Service and highlights the responsibilities back to the production facility. The integration of an Indigenous broadcasting service's programming can readily accommodate, direct and manage the studio based production output to great effect.

The overall staffing cost summary is

Figure 8 – Reporting summary



Staffing costs summary	Staff	Cost
Technical facilities Studio / MCR	13	$595,000
Management and Commissioning Unit	18	$1,251,000
News & weather, News analysis, Sports Round-up,	24	$1,146,000
Current Affairs	7	$366,000
Children's	4	$174,000
Arts	4	$174,000
Music	4	$174,000
Staffing Costs total	**74**	**$3,880,000**

Management and Commissioning Unit

The staffing for this production facility must be integral with the overall staffing and management required for the Indigenous broadcasting service. This will include senior management with its support staff including HR and Financial control along with the Commissioning Editors and Executive Producers required for each production genre. The identification and arrangement of these genres of television production has been taken from the Long and Coles report, (although one Commissioning Editor has been removed with the suggestion of the Commissioning Unit inclusive of Executive Producers).

The Commissioning Editors have been attached to the team of Executive Producers/ department heads to provide an integrated and complete Commissioning Unit that will facilitate the larger scale productions of Drama, documentaries, series and other productions.

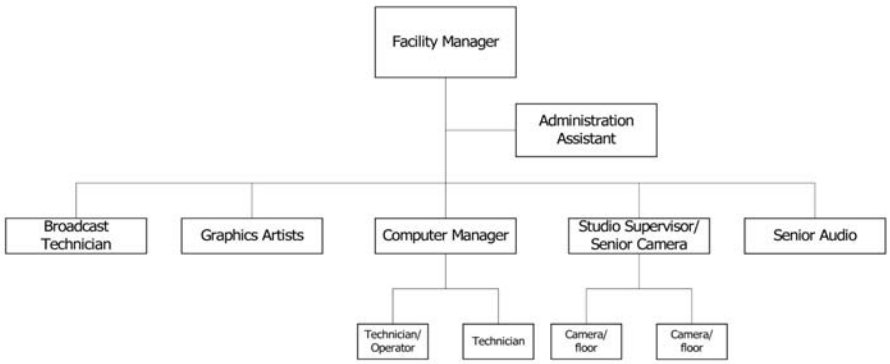
Management and Commissioning Unit	Staff	Salary
Commissioning Editors @ $85,000	2	$170,000
Senior Producers @ $85,000	5	$425,000
Admin assistants @ $35,000	5	$175,000
CEO	1	$200,000
Financial Controller	1	$85,000
HR Manager	1	$85,000
Finance assistants @ $38,000	2	$76,000
Receptionist	1	$35,000
Total Management staffing	**18**	**$1,251,000**

The staffing costs summary is followed by the departmental breakdowns of each department.

The departmental cost summary for each area follows.

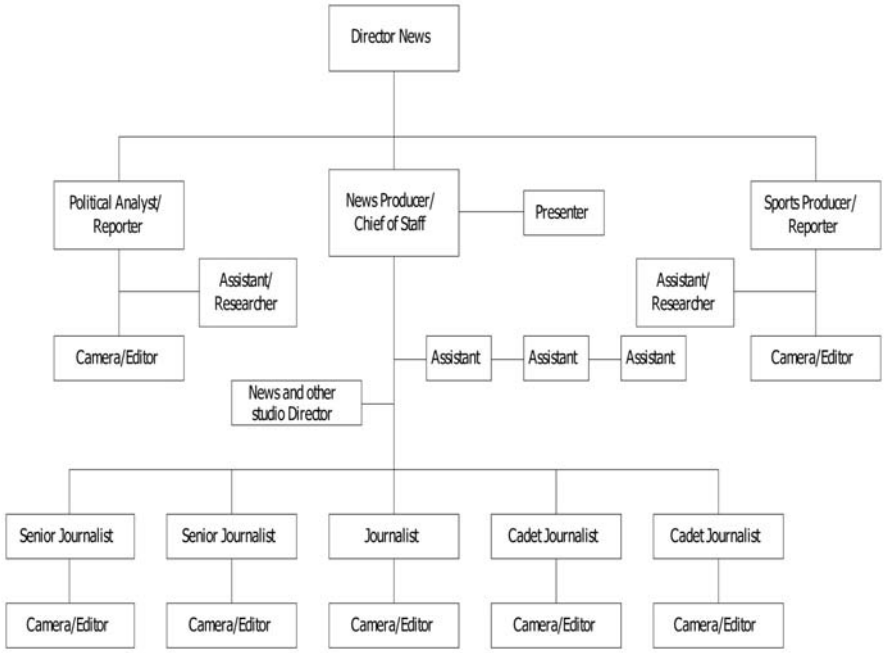
- Technical Services (Master Control/Studio Floor)
- News (including Sports Round-up and News Analysis)
- Program Modules

Org chart – Technical Facilities Master Control / Studio



Master Control / Studio: Presentation/Mastering/web (included facility admin computer support) Studio and control rooms	Staff	Cost
Computer manager	1	$65,000
Junior computer/ techs operators @ $35,000 x2	2	$70,000
Graphic artists @ $45,000 x 2	2	$90,000
Senior Floor / supervisor	1	$50,000
Junior camera @ $35,000 x 2	2	$70,000
Facilities/unit manager	1	$55,000
Assistant / admin	1	$35,000
Technician / operators @ $55,000 x 2	2	$110,000
Senior Audio Operator	1	$50,000
Total Studio Facility/Master Control staff	**13**	**$595,000**

Org chart News



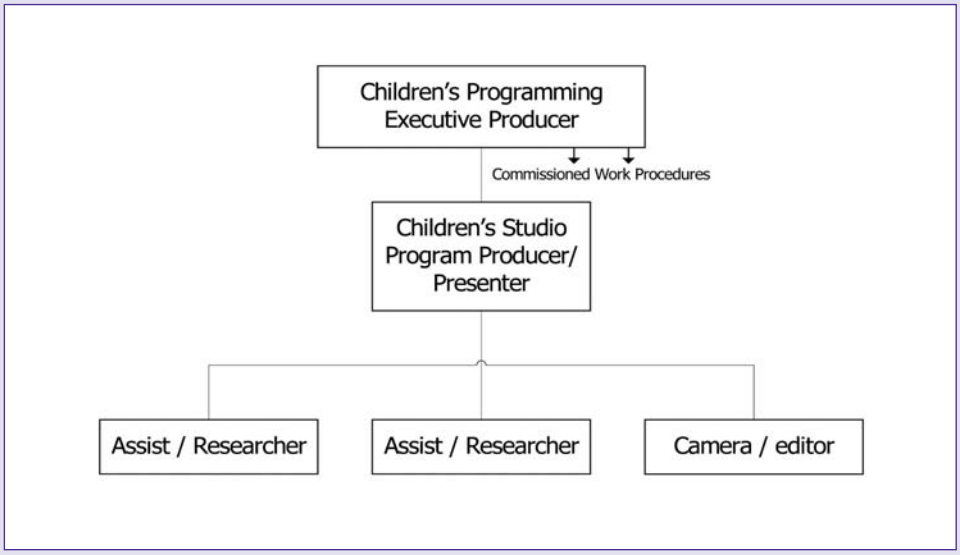
The summary costing for each Program Module follows:

- Current Affairs
- Children's Program Studio Unit
- Arts Program Studio Unit
- Music Program Studio Unit

Current Affairs

Option—Current Affairs	Staff	Cost
Caff Producer	1	$75,000
Senior Journalist/presenter	1	$70,000
Senior Journalist	1	$55,000
2 Researchers / assistants @$38,000	2	$76,000
2 camera/editors @ $45,000 x 2	2	$90,000
Total Current Affairs staffing	**7**	**$366,000**

Children's Program Studio Unit



Children's Program	Staff	Cost
Producer / presenter	1	$60,000
Production assistants @ $38,000 x 2	2	$76,000
Camera / editor	1	$38,000
Total Staff—Children's Program	**4**	**$174,000**

Arts Program Studio Unit

Arts Program	Staff	Cost
Producer / presenter	1	$60,000
Production assistants @ $38,000 x 2	2	$76,000
Camera / editor	1	$38,000
Total Staff—Arts Program	**4**	**$174,000**

Music Program Studio Unit

Music Program	Staff	Cost
Producer / presenter	1	$60,000
Production assistants @ $38,000 x 2	2	$76,000
Camera / editor	1	$38,000
Total Staff—Music Program	**4**	**$174,000**

Endnotes

1 ABC Annual report 2002—2003 at *http://www.abc.net.au/corp/ar03/* reports that the ABC produces approximately 1,380 hours of television news and current affair programming each year.

2 A standard 30 minute news bulletin 5 days a week, including news weather and sport segments, is not feasible at realistic budget levels without massive daily acquisitions either from network news originating from a mainstream broadcaster or from external suppliers such as newsagencies or foreign Indigenous news services.

3 This figure is provided by Channel Ten.

4 Camera/editors are a common trend in new and associated production. The camera person is also the editor. The basic kit allocations refer to disk backed cameras with an associated "standard" editing box.

5 Should ENPS be used for news, one licence, costing $900 p/a, would be all that would be required in order to share the server and all production automation. This would allow any number of programs to be prepared at minimum outlay.

6 Long and Cole report

7 A National Indigenous Communication Service—December 2000

8 Fishman, J.A. (1991) Reversing Language Shift. Clevedon: Multilingual Matters.

9 Fishman, J.A., ed. (2001) Can Threatened Languages Be Saved? Clevedon: Multilingual Matters.

10 ibid

Appendix—list of submissions

Appendix—List of submissions

Aboriginal Housing Board of Victoria

Akee, Tanya

Arts Access Australia

Australia Council for the Arts

Australian Broadcasting Authority (ABA)

Australian Broadcasting Corporation (ABC)

Australian Caption Centre

Australian Film Commission (AFC)

Baldwin, Geoff

Broom, Tammy

Brown, Stephen

Bush, Merissa

Cassidy, Kylee

Chadwick, P S

Corowa, Vanessa

Cousins, Sara

Donohue, Ursula

Dancing Iris Video Pty Ltd (Mollison, Martha)

Early Works

Film Australia (FA)

George, Lluwannee

Goolarri Media

Health Consumers' Council WA Inc

Hockey, Luke

Holzigal, Rebecca

Ibrahim, Fareeha

Jequerity Pty Ltd (Martha Ansara)

Lyons, Narelle

Maari Ma Health Aboriginal Corporation

Macklin, Ian

Manyozo, Linje

Markham, Denise

McDaniel, A/Prof Michael

McHugh, Clare

Media Entertainment and Arts Alliance (MEAA)

Mene, Maria

List of submissions continued

National Indigenous Television Committee (NITVC)

Nicholson, Elke

Northern Territory Government

O'Donnell, Carol

Pacific Film and Television Commission(PFTC)

Pilbara and Kimberley Aboriginal Media (PKAM)

Saunders, Elysia

Scealy, Petah

Scott, Rosie

Screenwest

Special Broadcasting Service (SBS)

Victorian Aboriginal Legal Service (VALS)

Victorian Health Promotion Foundation (VicHealth)