Dear Anthony

Indigenous Remote Communications Association’s Response to the Discussion papers on Draft TV Licence Area Plans

1. Executive Summary

IRCA would like to thank ACMA for the opportunity to comment on the draft TV Licence Area Plans for Remote Central and Eastern Australia and for Remote and Regional Western Australia.

Based on consultation with the remote Indigenous media organisations (RIMOs) on both TLAP discussion papers, the key points that IRCA would like to make are as follows:

1. Most of the RIMOs and RIBS want to maintain the capability to broadcast a community television service beyond the end of 2013;
2. The remote broadcasting sector supports the ACMA’s re-allocation of channels in light of the digital dividend;
3. RIMOs are keen to ensure that CTV and Open Narrowcast (ONC) licences are not forfeited while seeking ways to migrate to digital transmission;
4. The sector requests an additional year (to late in 2014 prior to re-stack) for use of existing UHF analog spectrum, to enable continuity of the Community TV (CTV) service only, where there is no competition for that spectrum;
5. The reasons for the request of additional time are as follows:
   • There is currently no identified funding in 2013-14 for migration of current analog CTV services to digital transmission;
   • RIMOs require more time to seek funding for migration to digital transmission;
   • Loss of continuity of CTV services, and potential surrendering of licences, will make re-start of these services very difficult or impossible.
Despite remote television production being excluded from Indigenous Broadcasting Program (IBP) funding since 2006, most RIMOs have found ways to maintain some video production. There are several factors that suggest that community TV broadcasting will make a resurgence over coming years:

- Indigenous Community Television (ICTV) is about to re-establish as a full-time TV service on the VAST satellite. This will reinvigorate remote area production and provide bed programming for the community broadcast service;
- New server and playout technologies are now available to enable more effective community television playout;
- The NBN will enable more affordable distribution and sharing of video content and promote increased access to ICTs for video production;
- the 2010 Stevens Review called for new media production to be reinstated with dedicated content funding (recommendations 8 and 10). The sector is still awaiting the government’s response to the review.

The response that follows addresses both CTV and Open Narrowcast restacking proposals, although we do note that the Discussion Paper indicates that there will be separate communication with ONC licensees. However, as our RIMOs coordinate both CTV and ONC sites, we consider it appropriate to address both licence types in this response.

IRCA is happy to provide additional information upon request in support of this submission.

### 2. Background and Scope

The Indigenous Remote Communications Association (IRCA) represents the eight (8) Remote Indigenous Media Organisations (RIMOs) operating across North Queensland, the Torres Strait, the Northern Territory and the remote areas of South Australia and Western Australia.

The eight (8) RIMOs we represent hold community TV licences as listed on Table 1 overleaf. These RIMOs in turn act as media support hubs for 149 Remote Indigenous Broadcasting Service (RIBS) locations that currently operate analog terrestrial TV transmission facilities throughout those areas through either CTV or Open Narrowcast licences.

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1 See Appendix 1 for RIMO list
<table>
<thead>
<tr>
<th>RIMO</th>
<th>Total RIBS communities</th>
<th>No. with CTV licences</th>
<th>No with ONC licences</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAAMA</td>
<td>15</td>
<td>5</td>
<td>10</td>
</tr>
<tr>
<td>NG Media</td>
<td>15</td>
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<td>6</td>
<td>9</td>
</tr>
<tr>
<td>PY Media</td>
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<td>15</td>
</tr>
<tr>
<td>QRAM</td>
<td>14</td>
<td>4</td>
<td>10</td>
</tr>
<tr>
<td>TEABBA</td>
<td>31</td>
<td>18</td>
<td>13</td>
</tr>
<tr>
<td>TSIMA</td>
<td>16</td>
<td>13</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>149</strong></td>
<td><strong>70</strong></td>
<td><strong>79</strong></td>
</tr>
</tbody>
</table>

*Table 1 CTV and ONC allocation across RIMOs*

As the ACMA will be aware, CTV licences were introduced in the late 1980s through to early 1990s to support remote Indigenous communities in maintaining language and culture in the context of the launch of Aussat and the introduction of free-to-air TV to those communities.

Two communities, Yuendumu and Ernabella, established the first indigenous TV stations in Australia in 1985, and with the rollout of the Broadcasting for Remote Aboriginal Communities Scheme (BRACS) around eighty (80) remote communities were granted community TV licences. Some communities such as Yuendumu have maintained regular community TV station programming, whilst others have retransmitted indigenous TV, most notably, ICTV from 2001 to 2007 as a 7-day a week service, and from late 2009 to 2013 as a weekend service.

The rich history of remote Indigenous television is of the utmost importance to remote communities. An overview of that history and the core principles of remote Indigenous media production is provided in Appendix 2.

It is important to note that the impetus behind the BRACS was the desire of Indigenous people to have a level of control over the content that came into their communities. The cultural staging of knowledge and skills transfer is core to many traditional communities as is the manner in which place and people are represented. This is exemplified in the common complaint about some SBS’s evening programming being inappropriate to the proper “growing” up of young people, as well as complaints about the unapproved screening of deceased content in mainstream produced documentaries.

Another key issue in the BRACS development was the absence in national broadcaster programming, of indigenous content affirming local day-to-day as well as cultural life. The provision of local community TV allowed content to be shown that was not of interest to national or even regional broadcasters or audiences. The opening of a child care centre, a visit to a local waterhole, a football practice session, a trip to a neighbouring community are content
areas of high interest to local audiences, and affirm identity and family connections. Even though such content can be sometimes roughly filmed on the fly and quickly edited, it is often this content when shown on local community TV that is the most popular.

Reasons for the importance of local Indigenous community TV to local communities

- Provision of a platform for distribution of local news and information and government messages in local language
- Support for maintenance of language and culture specific to the community
- Enables community members to view content that is not appropriate for national broadcast due to cultural sensitivity, duration, lack of post-production, or only of interest of that community (local meeting, football game, church service for example)
- Enables local scheduling to enable requests, repeat viewing, fit with preferred community viewing times, address local interests.
- Enables ubiquitous distribution. Remote people generally do not have internet access and computers in their homes for accessing relevant on-line media services (for example Indigitube, Youtube, iView). Broadcast TV is the primary option.
- Remote Indigenous people often live outside of traditional dwellings and commonly watch TV outdoors or in sorry camps. This is not possible under the DTH model.
- With the maintenance of Direct-to-Home (DTH) services in remote communities yet to be worked out (see Stevens Review Rec 38), a community broadcast service would provide a back-up service in the instance of DTH equipment failure.

Consequently by the late 1990s local community TV was a key feature of remote Indigenous media. The introduction of ICTV raised demand for the expansion of community TV in remote Indigenous communities. ICTV’s operational principles reflected the core media principles at the heart of remote media and as a consequence has had high degrees of acceptance in remote communities.

In response to this increased demand, the 2005 RIBS Television Transmitter Rollout Project was implemented providing funding for communities to receive retransmission equipment for ICTV. Non-CTV communities also gained open narrow cast licences for the retransmission service.

3. Disclaimer

IRCA has consulted broadly with the sector in developing this response. We arranged a direct telephone meeting between RIMO managers and ACMA
representatives to provide direct an opportunity for consultation and feedback. Where RIMO positions varied, we have gone with the majority position.

IRCA has encouraged individual RIMOs and licensees to also respond to the Discussion Papers to indicate their specific regional perspectives and priorities. Where views diverge from those expressed in this collective response, IRCA supports the responses of individual RIMOs in relation to the management and coordination of their communities.

Our response therefore is aimed at ensuring that the licencing arrangements required by RIMOs to plan for and implement their community television plans, are in place without the need to surrender and reapply for licences where funding of digital migration does not become available until after December 2013.

4. Response

4.1 Digital channel identification

In the context of low demand for spectrum in remote areas, the “pre-identification” of the restack channels as tabled in the Draft TLAPs for RIBS licences is a satisfactory approach. We also support the allocation of Channel 40 or 41 for ONC licences.

Response

1. Most of the RIMOs and RIBS want to maintain the capability to broadcast a community television service beyond the end of 2013.

2. The remote broadcasting sector supports the ACMA’s re-allocation of channels in light of the digital dividend.

4.2 Requirement to cease analog services by December 2013

4.2.1 Importance of remote local indigenous community TV

The importance of remote local Indigenous community TV for many communities cannot be underestimated. The loss of funding for its operation in 2007 and the impact of that loss on operations cannot be taken as meaning that interest in local TV has been replaced by NITV or even ICTV. We have already noted above the importance of locally managed and controlled TV.

Furthermore management of local TV provides employment opportunities for local young people through programs such as the National Jobs Program and opportunities for training and education.
The cessation of analog CTV and ONC licences for those communities wishing to transfer to digital for such reasons undermines and impedes progress towards planning for digital transmission, continued content production and planning for training and employment outcomes.

Response

3. RIMOs are keen to ensure that CTV and Open Narrowcast (ONC) licences are not forfeited while seeking ways to migrate to digital transmission.

4.2.2 Coordination of analog switch off date for RIBS TV with DTH rollout completion.

Remote communities are not traditionally areas where there is competition for spectrum. The communities typically retransmit only one to five of the free to air television channels. Central Australia for example has options of ABC1, SBS, SCTV, Imparja and RIBS TV.

It is highly unlikely that there will be demand for digital dividend spectrum prior to the re-stack in remote communities following the completion of the VAST DTH rollout.

Given that all free-to-air TV will be received via DTH, including ICTV and the new Freeview channels, it is likely that community members will indeed embrace the switch to digital.

We consider that the continuation of RIBS analog TV licences will not dilute the messaging around the digital switchover nor will it interfere with spectrum sales in the low demand areas in which RIBS are located.

RIMOs and IRCA can make use of their various communication networks and platforms to ensure clear messages go out to regarding the changes specific to remote communities.

Response

4. The sector requests an additional year (to late in 2014 prior to re-stack) for use of existing UHF analog spectrum, to enable continuity of the Community TV (CTV) service only, where there is no competition for that spectrum.
4.2.3 Digital migration funding availability

The ACMA will be aware of the removal of Indigenous Broadcasting Program funding for community television operation from RIMOs since the 2007/2008 financial year, without any replacement funding being made available.

Unlike metropolitan community TV stations, no Australian Government funding support has been offered to remote Indigenous community TV stations to support migration to digital transmission. However some RIMOs are proposing to migrate RIBS TV services to digital, and will need to proactively source the funding for the migration.

Fortunately, lower cost, small-scale options for digital transmission are emerging with digital transmitters in the $2-3000 range. Further, PAKAM and Ngaanyatjarra Media for example are currently investigating a “hub” model whereby regional content is collated and distributed online from the RIMO hub to a network of media servers loaded with automated playout software in individual RIBS sites. A switcher at the RIBS would enable switching between the local playout and an ICTV retransmission. Local communities with the appropriate skills could also add new content to the playout.

The model also opens up the possibility of managing streaming, given adequate bandwidth from sites such as IndigiTUBE or via IPTV-style delivery of ICTV.

PAKAM has been successfully operating RIBS TV via a similar model except that content is distributed via mailed hard drives that are then loaded by local media workers for the playout.
Current indications are that each RIBS site will cost around $10,000 for digital migration, although there will be variations such as rigging costs for installation of an antenna suitable for digital transmission.

RIMOs wishing to pursue digital transmission will require lead-time to gain the funding needed for equipment, installation and training. The retention of the current CTV and ONC analog licences and ongoing broadcasting will provide a framework, as well as the incentive, for the work involved.

The retention of community broadcasting will also maintain the momentum for local content production that re-emerged with the ICTV weekend service and with the upcoming launch of the full-time ICTV VAST channel.

The 2010 Review of Australian Government Investment in the Indigenous Broadcasting and Media Sector (Stevens Review) identified the need for funding support for communities to re-establish multimedia production and associated training opportunities, as per Recommendation 8 (p.57, excerpt):

*The IBP funding arrangements be restructured to:
• include multi-media activities such as new media content, training and infrastructure.*

and Recommendation 10 (p.57):

*Funding for the IBP to be increased by $8 million a year, phased in over the next two years, with a further $5 million each year to be allocated to an Indigenous content and project fund, part of which would be funded from transfers from existing allocations to the CBF and Imparja. During 2011, the government review the financial model underpinning funding allocations under the IBP, including staffing, compliance with award rates, operational functions, multi-media activities and the increased role of Remote Indigenous Media Organisations (RIMOs) to develop a more appropriate benchmarking protocol to guide funding allocations from 2012–13 onwards.*

Lead-time is also needed to investigate possible linkages with the NBN rollout. The NBN rollout was identified as a key component for distributing local multimedia products with Recommendation 39 of the Review stating that:

*The DBCDE liaises with NBN Co to ensure that Indigenous broadcasting and media organisations are provided with early access to the national broadband rollout. This may require subsidised access to the NBN network for RIBS and RIMOs.*
The Australian Government response to the Review is still awaited. Nevertheless the NBN is being rolled out and time is needed to identify those NBN plans that can be coordinated with the community TV hub model described above.

Response

5. Additional time needs to be allowed for migration to digital as:

(a) There is currently no identified funding in 2013-14 for migration of current analog CTV services to digital transmission.

(b) RIMOs require more time to seek funding for migration to digital transmission.

(c) Loss of continuity of CTV services, and potential surrendering of licences, will make re-start of these services very difficult or impossible.

5. Other matters

Surrendered CTV licences

As discussed at the commencement of this Response the history of RIBS TV is marked by the desire of local communities to support and maintain culture and language. The retention of a licence that reflects the specific community needs of remote Indigenous communities is important for the sector’s cohesiveness and development.

Where a licensee surrenders a CTV licence, and at a later date seeks a licence for a digital community TV service for that same community, we propose that the CTV be reinstated where relevant conditions are met.

Thank you again for the opportunity to comment. Please do not hesitate to contact me to follow up any of the matters raised in our response.

Yours Sincerely

Daniel Featherstone
General Manager

4 March 2013
Appendix 1
List of Remote Indigenous Media Organisations

1. Central Australia Aboriginal Media Association (CAAMA)
2. Ngaanyatjarra Media (NG Media)
3. PAW Media and Communications
4. Pilbara and Kimberley Aboriginal Media Association (PAKAM)
5. Pitjantjatjara Yankunytjatjara (PY Media)
6. Queensland Remote Aboriginal Media Association
7. Top End Aboriginal Bush Broadcasting Association (TEABBA)
8. Torres Strait Island Media Association (TSIMA)
Appendix 2

Core principles of remote Indigenous media

- Production is embedded in local cultural practices and protocols.
- Cultural custodians guide production decisions; Indigenous persons fulfil key creative crew roles.
- Screening and distribution is mindful of local cultural practices and protocols.
- Local communities have control over screenings. Content may be pulled immediately from scheduled programming for reasons of death or emerging/changing cultural sensitivities.
- Production is in the languages of local communities.
- Remote Indigenous media’s purpose is to promote, maintain and strengthen indigenous languages and culture.
- Remote Indigenous media content production affirms Indigenous identity in all aspects of life through videoing of sports, community events, church events, country visits, music concerts and other social activity.

Brief History of Remote Indigenous Community Television

- 1982 to 1986 - EVTV (Ernabella, SA) and Warlpiri Media Association (Yuendumu, NT) commence local video production and pirate telecasts.
- 1984 - ‘Out of the Silent Land’ report released
- 1986 - Eric Michaels presents his report to AIAS entitled ‘The Aboriginal Invention of Television’ which looked at the use of video as a tool for cultural maintenance, in particular with the works of Francis Jupururrala Kelly.
- 1987 to 1996 - The BRACS (Broadcasting in Remote Aboriginal Communities Scheme) was rolled out to 103 remote Indigenous communities around Australia as a response to the launch of the Aussat Satellite and the introduction of free-to-air television in remote communities. The BRAC Scheme enable the transmission of locally produced television and radio.
- 1993 - The commencement of the BRACS Revitalisation Strategy. This Strategy provided funding for training, production and technical support for eight regional media associations.
- 1998 - 1st Remote Video Festival was held at Kintore (Walungurru NT) which showcased the range of video produced by Indigenous people in remote communities.
• October 2001 - ICTV established at the 3rd Remote Video Festival in Umuwa, South Australia by PY Media, Warlpiri Media (now PAW), PAKAM and Ngaanyatjarra Media.

• 2002 to 2004 - 'IRCA in Action' video playout commences transmission on Channel 31, the second Imparja Satellite channel. Video ingest and playout supported by Imparja.

• 2004 to ICTV receives first amount of funding ($25K) to purchase an automated playout system; ICTV is set up at PY Media offices in Alice Springs, with a relay to Imparja enabling 24 hour a day feed to Imparja; Eight (8) to twelve (12) hours of new programming from remote communities received each month with no production funding; 80% of programming in Indigenous languages.

• 2005 to 2006 - RIBS Television Transmitter Rollout Funding ($2 million) enabled approximately 149 remote communities to receive and retransmit ICTV Programming.

• October 25 2006 - Inaugural Annual General Meeting of ICTV held at Balgo community, Western Australia; ICTV becomes incorporated.

• 2006 to 2007 - ICTV grows in popularity in remote communities, resulting in a resurgence of video production of language and culture programming.

• May 2007 - ICTV Forum held in Alice Springs to discuss aggregation agreement with NITV; Pioneers of video movement in remote communities describe history; No outcomes from meeting.

• July 12 2007 - ICTV is taken 'off air' from the Imparja satellite in preparation for NITV Programming.

• September 2007 - 9th Remote Video Festival held in remote community of Warakurna, Western Australia; theme of 'ICTV Into the Future' looks at options for re-establish ICTV.

• July 1 2008 - ICTV commences to operate independently.

• April 2009 - ICTV video streaming website - IndigiTUBE - goes live at http://www.indigitube.com.au

• November 13, 2009 - ICTV recommences broadcasts, on a weekend basis, on the Westlink satellite service on Channel 23 on the Optus Aurora satellite.

• September 2, 2010 - Upgraded IndigiTUBE website launched at Melbourne Writer's Festival.