Investigation report no. BI-489

| Summary |  |
| --- | --- |
| **Licensee** | Light Melbourne Inc |
| **Station** | 3TSC |
| **Type of service** | Community broadcasting—radio |
| **Relevant legislation** | Schedule 2 to the *Broadcasting Services Act 1992:*Paragraph 9(2)(d) - the licensee will provide the service or services for community purposesParagraph 9(2)(e) - the licensee will not operate the service for profit or as part of a profit-making enterprise |
| **Decision** | No breach of paragraph 9(2)(d) of Schedule 2 to the *Broadcasting Services Act 1992* No breach of paragraph 9(2)(e) of Schedule 2 to the *Broadcasting Services Act 1992* |

Background

In April 2019, the Australian Communications and Media Authority (the ACMA) commenced an investigation under the Broadcasting Services Act 1992 (the BSA) into the compliance of Light Melbourne Inc (the licensee) with the licence condition to not operate the service for profit or as part of a profit-making enterprise (paragraph 9(2)(e) of Schedule 2 to the BSA).

The licensee holds a long-term community radio broadcasting licence to serve the religious - Christian community interest in the Melbourne RA1 licence area in Victoria. It has operated since 1 December 2002. The licence was last renewed in 2016 and expires on 31 December 2021.

In July 2019, the ACMA broadened its investigation to also consider the licensee’s compliance with the licence condition to provide the service or services for community purposes (paragraph 9(2)(d) of Schedule 2 to the BSA).

Submissions

This investigation has considered the submissions made by the licensee on 7 May 2019, 30 August 2019, 26 September 2019, 14 February 2020 and 30 April 2020. Other matters considered are identified in this report where relevant.

Issue 1: Does the licensee provide the service for community purposes?

Relevant licence condition

 **9 Conditions applicable to services provided under community broadcasting
 licences**

(2) Each community broadcasting licence is also subject to the following conditions:

[...]

(d) the licensee will provide the service or services for community purposes;

Finding

The licensee did not breach the licence condition at paragraph 9(2)(d) of Schedule 2 to the BSA.

Reasons

The licence condition at paragraph 9(2)(d) requires community broadcasting licensees to provide a service for community purposes. The BSA does not define ‘community purposes’.

When assessing compliance with this provision, the ACMA has considered the term ‘community purposes’ in the context of a licensee’s representation of its local community interest. Such an assessment considers whether the licensee provides a service that represents the interests of the persons who make up the local community in the licence area served by that licensee. Noting the licencing framework,[[1]](#footnote-2) community broadcasting services are intended to complement other broadcasting services because of their focus on the specific community in the licence area.

The ACMA considers a licensee provides a service for community purposes if its activities are focused on representing its community interest. One of the ways a licensee may demonstrate this is to actively monitor, and be responsive to, the needs of its community. A licensee can also demonstrate its compliance with this licence condition through the development and provision of programming that aims to reflect the needs and interests of its community and by taking steps to engage the community and encourage community participation. When assessing compliance, the ACMA has regard to matters such as the on-air broadcast activities of the licensee, the licensee’s membership, the selection and production of programming, and other operations.

When considering whether the licensee is providing a service for community purposes in the Melbourne RA1 licence area, the ACMA sought information about members, volunteers, programming details, community engagement and participation, and details about how operational and programming decisions for the station are made for the licensee.

***Community interest***

The licensee is licensed to provide a community broadcasting service that represents the community interest of the Christian community in the Melbourne RA1 licence area. This is the relevant ‘community’ for the purposes of this investigation.

***Membership and volunteers***

As at 30 June 2019, the licensee had 230 members. This is below the average for metropolitan community broadcasting stations (552) and is comparable to the national average of community broadcasters representing the religious - Christian community interest (254).[[2]](#footnote-3) The licensee’s members have increased from the 117 members reported to the ACMA in July 2017.

As at 30 June 2019, the licensee had 132 volunteers actively involved in the operation of the station. This is below the average for metropolitan community broadcasting licensees (265) in 2015-16, but above the national average for religious services (46).[[3]](#footnote-4)

Of the licensee’s volunteers, roles included fundraising (90) or marketing (23), with 15 volunteers involved in decision-making positions such as those on the board and sub-committees, and 6 involved in the provision of content for either the analog or digital broadcasting services. Some volunteers were involved in multiple areas of the organisation.

***Programming and operations***

The licensee has an established studio in the licence area that provides a physical location for members of the community to attend and communicate with the licensee in person. The licensee produces 134 hours of local content each week (80 per cent) for its analog broadcasting services.[[4]](#footnote-5) This is less than the level reported during its last licence renewal (86 per cent) but remains above the average for metropolitan community broadcasting stations (76 per cent).

The licensee provided evidence that it actively monitors community needs, including by undertaking several surveys and focus groups in the past 2 years to better inform its understanding of community needs.

Survey results indicate that the service is well received by listeners in the licence area, with a monthly audience in excess of a million listeners older than 15 years (cumulative reach).

The minutes of programming team meetings indicate the licensee’s on-air content changes are made, primarily, as a result of announcer availability, rather than in reference to the survey results. However, the minutes include programming adjustments in response to the community interest (e.g. Easter, Christmas content), and following other programming directives (e.g. greater focus on a local emergency).

In considering whether the licensee engages the community and encourages community participation, the licensee submitted that, in 2018, there were 18 on-air presenters across both its analog and digital radio services. This included 12 paid on-air presenters (4 full-time, 3 part-time and 5 casual or on contract). The licensee stated, ‘in recognition that radio audiences connect with the on-air presenters, consistency in the on-air line up is important to 3TSC and its community of interest’.

**Conclusion**

The ACMA notes that the high proportion of paid on-air presenters, and the licensee’s preference for ‘consistency’, could present a barrier, perceived or real, for some members of the community wanting to be involved in the on-air activities of the station. However, the licensee has feedback mechanisms in place, including through regular meetings and comprehensive complaints handling processes, that provide for accountable and transparent decision-making, and which support the provision of a service for community purposes.

The ACMA considers that, having regard to the service as a whole, including the licensee’s on-air activities and operational matters including membership, engagement and content production, on balance the licensee’s service is provided for community purposes.

Issue 2: Is the licensee operating the service for profit or as part of a profit-making enterprise?

Relevant licence condition

 **9 Conditions applicable to services provided under community broadcasting
 licences**

(2) Each community broadcasting licence is also subject to the following conditions:

[...]

(e) the licensee will not operate the service or services for profit or as part of a profit-making enterprise.

Finding

The licensee did not breach the licence condition at paragraph 9(2)(e) of Schedule 2 to the BSA.

Reasons

**Not operating the service for profit**

A community broadcasting service must not operate for the purpose of making a profit. A licensee is licensed to provide a broadcasting service that is run for the community, by the community, for the identified community interest. The licensee is afforded free access to valuable radiofrequency spectrum to provide its service.

This investigation report considers compliance by a community broadcasting service with its licence conditions under the BSA. The BSA does not define the term ‘for profit’. The term ‘for profit’ as it appears in the licence condition at paragraph 9(2)(e) of Schedule 2 to the BSA (and Part 2 of the BSA, which establishes the different categories of broadcasting services) is something that must be considered in the context of the BSA as a whole, noting that it is:

* used in relation to a *service*, as opposed to a licensee organisation;
* key in delineating a commercial broadcasting service from a community broadcasting service, and therefore whether access to valuable radiofrequency is provided for free or not.

The Explanatory Memorandum to the BSA confirms that the term ‘for profit’ is intended to be interpreted narrowly, with respect to a service (as opposed to a licensee), and with the purpose of ensuring that the community broadcasting licence category is not expansive:

Paragraph [15](b) recognises that some community broadcasters may have a modest operating surplus at the end of a financial year; this in itself would not exclude such a service from [the community broadcasting service] category. So long as those surpluses are utilised for the continued operation of the service and are not distributed for personal use amongst those persons who are involved in the management or operation of the service, this criterion will be satisfied. However, this criterion would not permit a situation where a community broadcasting service was conducted in such a manner as to produce a large operating surplus which was then distributed in the form of large salaries, wages, allowances or fees to those persons involved in the management and/or operations of the service.[[5]](#footnote-6)

In the ACMA’s view, and as stated in the ACMA’s Community broadcasting not-for-profit guidelines[[6]](#footnote-7):

If salaries or commissions are excessive, a licensee could avoid ever making a surplus because of the ongoing distribution of revenue, as it is earned, to staff or contractors. This may constitute a breach of the licence condition. Similarly, it would not be in keeping with the community purpose of a community broadcasting service were a licensee to distribute any surplus as bonuses to staff or contractors.

In the ACMA’s view, a community broadcasting licensee would not be operating its service for profit in the context of the licence condition at paragraph 9(2)(e) if a licensee’s operating costs (including reasonable staff costs) are less than a licensee’s operating income for the service, and any operating surplus is utilised for the continued operation of the service.

However if, for example, a licensee pays excessive salaries to persons involved in the management and/or operations of the service or distributes operating surplus for personal use amongst persons who are involved in the management or operations of the service, these may be indications that the service is operating for profit.

***Licensee’s operating costs and operating income***

As a registered charity, the licensee is required to lodge audited annual reports with the Australian Charities and Not-for-profits Commission (ACNC). The licensee’s 2018 Annual Information Statement (AIS), published by the ACNC, reported a gross income of $6,033,677 and total expenses of $5,927,233.[[7]](#footnote-8)

In its 2018 AIS, the licensee’s largest income categories were donations and bequests ($3,407,877 or 56 per cent of all income), and sponsorship ($2,393,751 or 40 per cent of all income).[[8]](#footnote-9) As Table 1 shows, donations and sponsorships have consistently accounted for over 90 per cent of the revenue in each of the 5 years to 2018, with employee expenses accounting for between 56 and 63 per cent of total expenses.

In its 2018 AIS, the licensee’s largest expense category was salary and wages ($3,499,996 or 59 per cent of all expenditure). The licensee’s submission notes that when determining its budget, it aims for staffing expenses to be between 55 and 60 per cent of its overall revenue. By ensuring there are sufficient non-staffing resources (40 to 45 per cent of revenue), the licensee notes this ‘allowed the station to slowly build up an equity base to ensure the sustainability of the organisation’.

The licensee’s 2018 AIS notes that, at that time, it had 24 full-time employees, 12 part-time employees and 8 casual employees, with 34.86 full-time equivalent (FTE) staff.[[9]](#footnote-10)

The licensee’s other expenses in 2018 included:

* $409,968 (7 per cent of total expenses) on ‘cost of income’ (described as ‘the direct cost of fundraising such [as] donor events, gifts and communication, appeal letters and expenses during appeals. Direct cost of sponsorship sales such as agency fees, outside broadcast costs, live read costs, sponsorship events, gifts and communications. Direct costs of audio production.’)
* $269,922 (5 per cent of total expenses) on consultants and other professional services
* $143,304 (2 per cent of total expenses) on management and administration
* $168,877 (3 per cent of total expenses) on travel and vehicle expenses.

Remaining expenditure ($1,435,166, 24 per cent of total expenses) was incurred on broadcast technology, finance and occupancy costs.

**Table 1: Summary of licensee total income and expenses 2014-2018**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | 2014[[10]](#footnote-11) | 2015[[11]](#footnote-12) | 2016[[12]](#footnote-13) | 2017[[13]](#footnote-14) | 2018[[14]](#footnote-15) |
| Gross income | $4,153,450 | $4,323,895 | $4,757,985 | $5,328,053 | $6,033,677 |
| * Donations
 | $1,895,177 | $2,386,049 | $2,596,171 | $3,166,697 | $3,407,877 |
| * Sponsorships
 | $2,015,927 | $1,708,318 | $1,777,586 | $2,038,964 | $2,393,751 |
| Total expenses | $4,116,498 | $4,114,374 | $4,515,434 | $5,077,082 | $5,927,233 |
| * Employee expenses
 | $2,598,540 | $2,335,857 | $2,566,348 | $2,831,987 | $3,499,996 |

The licensee’s operating income less its operating costs produces a reported surplus of $106,444 for 2018. The licensee’s total assets were $2,163,898 and liabilities were $1,309,422. The licensee’s equity, built up through retained surpluses, was $854,476. By comparison, the 2014 AIS notes the licensee’s equity was $44,989 (Table 2 refers).[[15]](#footnote-16)

**Table 2: Summary of licensee net assets 2014-2018**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | 2014 | 2015 | 2016 | 2017 | 2018 |
| Net assets | $44,989 | $254,510 | $497,061 | $748,032 | $854,476 |

In response to the ACMA’s preliminary investigation report, the licensee noted it ‘has taken the approach to generate a modest surplus… The goal of [the licensee] is to manage a successful community [radio] station by engaging positively with our community of interest with interesting programs and up-to-date content.’

***Generation of revenue***

The ACMA acknowledges that there is a broad range of community broadcasters with varying operating models and capacities to fund expenses. The ACMA accepts that licensees generate different amounts of revenue and some licensees may distribute revenue in the form of salaries and commissions.

In February 2020, the licensee provided the following statements regarding its operating model and the expenditure of revenue:

We have invested greatly in our content, staff, equipment and infrastructure to deliver an exceptional radio service that engages with all members of our Christian community in Melbourne. […] As a well-regarded community radio station with a very high listenership, we need to equip our service with talented resources, well-designed content and engaging on-air presenters. We employ approximately 37.3 FTE to service our operations and these employees are supported by our team of volunteers (including our Board).

[…]

The revenue generated by [the licensee] reflects the size of its listener base. [W]e have the largest community of interest of any community station broadcasting in the Melbourne RA1 licence area. Our approach to generating revenue is directed towards the performance of our radio station, the upkeep of the station equipment and infrastructure, the delivery of up-to-date content, the management of our active volunteer base and strengthening the already active engagement we have with our listeners. To achieve this, it requires us to invest in high-quality, well-performing, respectable and dedicated employees who share our values, mission and objective.

[…]

The product of our engagement with the community is the receipt of funds from donors and sponsors who trust us and value our community radio station.

The licensee’s revenue is driven from 2 activities: the sale of airtime for the broadcast of sponsorship announcements and through fundraising ventures. The revenue is generated through the employment of 6.6 FTE business development staff, who promote the licensee’s sponsorship opportunities, and 4.8 FTE fundraising staff, who seek and gather funds for the station through donations.[[16]](#footnote-17)

Through this income, the licensee provides 2 radio services under its community broadcasting licence, LightFM and LightDigital, with an average monthly audience of 1,293,000 listeners. With respect to the delivery of radio content, the licensee has at least 17 presenters or producers (on a paid or volunteer basis).[[17]](#footnote-18)

***Distribution of income***

The licensee’s largest expense is its employee costs. In determining remuneration, the licensee uses not-for-profit ‘industry benchmarks’, as well as its own benchmarking (commissioned from an independent NFP expert) where industry data is not available. The licensee noted that, when considering executive remuneration, it refers to the Pro Bono Salary Survey (an independent annual publication) and, from time to time, other salary surveys (including Hays, Michael Page, Institute of Managers and Leaders and the Governance Institute of Australia). When considering non-executive remuneration, the licensee refers to its salary structure program, which was developed in collaboration with ‘an expert and independent remuneration consultant in the not-for-profit sector’.

***Reasonable expenditure***

In considering the remuneration set by the licensee, the ACMA considers what is reasonable in the context of a community radio broadcasting licence. It is relevant (but not conclusive) to consider what remuneration arrangements are in place for comparable licensees. The ACMA does not have individualised salary data for community broadcasters. Instead, industry comparisons are drawn, in aggregate, from 6 other community broadcasting licences.[[18]](#footnote-19) In the ACMA’s view, these licensees are the most relevant comparisons because, as community broadcasters, they are equally afforded free access to valuable radiofrequency spectrum to provide community broadcasting services and they provide those services in the same licence area (Melbourne RA1). Broadcasters within the same licence area may have shared community interests, shared listenerships, and may have similar infrastructure and operational expenditure costs. As the 6 broadcasters are registered not-for-profit organisations, annual reports are lodged with the ACNC and those reports have been used for this comparison. The following observations are made:

* the licensee’s total expenditure on staff ($3,499,996) is more than 3 times the average of the other community broadcasting licences in the licence area ($1,123,273)
* the licensee employed (34.86 FTE) more than 3 times the average of the other community broadcasting licences in the licence area (10.88 FTE)
* the licensee’s expenditure on staff is, on average, $100,401 per FTE,[[19]](#footnote-20) which is 47 per cent more than the average of the other community broadcasting licences in the licence area ($68,343 per FTE)[[20]](#footnote-21)
* the licensee’s percentage of revenue spent on staff cost, at 59 per cent, is similar to the average of the other community broadcasting licences in the licence area (56 per cent).

In response to the ACMA’s preliminary investigation report, the licensee noted:

* ‘it is incurring reasonable operating expenditure, including salaries, in the pursuit of generating revenue to maintain the community broadcasting service’
* ‘all payments of salaries and where applicable, of commissions, represent bona fide compensation to [staff] and are directly related to the work performed or services rendered’. … ‘[I]t appears that the ACMA is comparing 3TSC to other local community radio stations that employ between 8-10 FTEs. However, [the licensee] is larger […] The larger the organisation the more complex it is to operate, and the more staff with the right experience and skills are required to provide appropriate supervision, management and governance.’

The licensee contends that, when compared against other ‘large’ community broadcasters in Australia (such as Hope Media (Sydney), 3RRR (Melbourne) and Family Radio (Brisbane)), the percentage of revenue spent on staff costs is ‘not unusual or excessive’.

The ACMA acknowledges that, while the most relevant comparisons are to community broadcasters within the same licence area, the licensee’s revenue spent on staff cost is not disproportionate or excessive to the licensee’s operations, when compared to:

* the percentage of revenue spent on staff costs by other ‘large’ community broadcasters outside of Melbourne RA1, and
* the licensee’s not-for-profit ‘industry benchmarks’.

The licensee also demonstrated that, on an individual basis, the payment of salaries generally represents comparable amounts to current market rates and the payment of which is directly related to the work performed.

The licensee’s expenditure on staff includes the payment of bonuses. In 2018 the licensee paid 31 staff members a total of $117,471 in bonuses (3 per cent of staff costs). The payment of any bonus by a community broadcaster, particularly bonuses that are contingent on a licensee achieving a surplus, must be handled carefully or else the licensee risks operating for profit. The licensee notes that ‘the rationale for bonuses and incentives is to reward exceptional performance, retain key employees, to attract skilled employees and to focus and drive performance.’ The licensee operates 4 incentive schemes (one for its CEO, one for its executives, one for eligible staff who participate in the business development and sales director incentive plans, and one for general staff members).

The ACMA has reviewed the licensee’s policies and procedures, and the minutes of meetings of the licensee’s Board, Finance and Audit and Remuneration and Nominations committees. From these, it is apparent that the licensee has administered the payment of bonuses in keeping with its performance review framework and detailing the financial decisions made by the various managerial committees.

The licensee acknowledged it has a responsibility to apply revenue to improve its broadcasting services. For example, any surplus income could be used to improve on-air facilities such as broadcast studios, transmission facilities or outside broadcast equipment. The licensee notes ‘Over the past 5 years we have increased capital expenditure year on year. In late 2019, we recently completed a refurbishment of our offices which included new computer equipment for staff, a better working space, more meeting rooms, and more communal areas for staff and volunteers to integrate.’

Over the next 3 years, the licensee intends to upgrade its master control and studio technical equipment, make improvements in the quality of audio processing and refresh its studio experience (including updates to lighting).

***Conclusion***

The ACMA considers that the licensee has operated the service to produce a large operating income. The licensee has demonstrated that the remuneration paid to persons involved in the management and operations of the service are not unreasonable and that the distribution of operating surplus is directed towards the continued operation of the service and therefore the service is not operating for profit.

Accordingly, the ACMA is of the view that the licensee is not operating the service for profit, as required by the licence condition in paragraph 9(2)(e) of Schedule 2 to the BSA.

Observations

Notwithstanding the overall conclusion, the ACMA notes that a number of features relating to the operation of the service may continue to raise questions about whether the licensee is providing a service for community purposes or operating the service for profit.

The ACMA recommends that the licensee carefully monitor its remuneration arrangements and other business decisions to ensure it remains compliant with its license conditions.

The ACMA would specifically draw the licensee’s attention to the following areas.

* Its reliance on paid staff to fill many key positions, including most on-air announcer positions, has the potential to limit the opportunities for community involvement in the programming and operations of the licence.
* Whether the licensee’s bonus programs that reward increased revenue generation, as discussed in relation to Issue 2, are complemented by appropriate business plans for the use of any additional revenue in a manner consistent with the licence conditions.
* The licensee has ambitions to reach (and serve) communities outside its licence area[[21]](#footnote-22) through non-broadcast means. The licensee’s obligations at paragraph 9(2)(d) and (e) of Schedule 2 to the BSA require the licensee to continue to operate its service for community purposes and on a not-for-profit basis. The licensee must take care to ensure revenue generated as a result of the community broadcasting service does not subsidise the licensee’s ventures outside of that service.
1. Including that in allocating a community broadcasting licence, the ACMA must have regard to the nature and diversity of other broadcasting services (including national broadcasting services) available within the licence area (subsection 84(2) of the BSA). This is also a matter that is relevant to the renewal of community broadcasting licences [↑](#footnote-ref-2)
2. Community Broadcasting Station Sector Financial Health of Community Radio Survey for the 2015-2016 Financial Year (October 2017), page 20 [↑](#footnote-ref-3)
3. Community Broadcasting Station Sector Financial Health of Community Radio Survey for the 2015-2016 Financial Year (October 2017), page 34 [↑](#footnote-ref-4)
4. Light FM program guide, <https://www.lightfm.com.au/shows/show-schedule/>, accessed 4 November 2019 [↑](#footnote-ref-5)
5. Revised Explanatory Memorandum to the Broadcasting Services Bill 1992. Paragraph 15(b) of the BSA defines the characteristics of a community broadcasting service to include not operating for profit or as part of a profit-making enterprise. This is reflected in the licence condition for community broadcasting services at paragraph 9(2)(e) of Schedule 2 to the BSA. [↑](#footnote-ref-6)
6. ACMA’s Community broadcasting not-for-profit guidelines, <https://www.acma.gov.au/sites/default/files/2019-06/Community%20broadcasting%20not-for-profit%20guidelines%20docx.docx> [↑](#footnote-ref-7)
7. <https://www.acnc.gov.au/charity/103084a2328c076370ef023d1032ad26#ais-0d310b68b4ae13143628e8c073be2787> (accessed 18 September 2019) [↑](#footnote-ref-8)
8. <https://acncpubfilesprodstorage.blob.core.windows.net/public/e50cefea-38af-e811-a960-000d3ad24282-e0f7559c-13ea-4452-b69a-0edc3d761939-Financial%20Report-b6948ab3-3799-e911-a976-000d3ad24077-Light_Melbourne_-_Annual_Audited_Financial_Statements_2018.pdf> (accessed 18 September 2019) [↑](#footnote-ref-9)
9. This is an increase from 32 FTE in 2017, report to ACNC, and 27.5 FTE in the 2015 report to the ACMA [↑](#footnote-ref-10)
10. <https://www.acnc.gov.au/charity/103084a2328c076370ef023d1032ad26#ais-77c414c47a2defb66803b64d28f2d1ff> (accessed 18 September 2019) [↑](#footnote-ref-11)
11. <https://www.acnc.gov.au/charity/ais/8a4d240b4aa90f40bd58f6437b3baee6> (accessed 18 September 2019) [↑](#footnote-ref-12)
12. <https://www.acnc.gov.au/charity/ais/836954f713f727c5aa5e67ac4a01a237> (accessed 18 September 2019) [↑](#footnote-ref-13)
13. <https://www.acnc.gov.au/charity/ais/5a9b7d2785f3a7b3489068f28d204c6e> (accessed 18 September 2019) [↑](#footnote-ref-14)
14. <https://www.acnc.gov.au/charity/103084a2328c076370ef023d1032ad26#ais-0d310b68b4ae13143628e8c073be2787> (accessed 18 September 2019) [↑](#footnote-ref-15)
15. <https://www.acnc.gov.au/charity/103084a2328c076370ef023d1032ad26#ais-77c414c47a2defb66803b64d28f2d1ff> (accessed 18 September 2019) [↑](#footnote-ref-16)
16. The business development and fundraising staff report to executives including a chief executive officer, fundraising manager and sales director. [↑](#footnote-ref-17)
17. The licensee employs 7 other executives including a content director, station manager, marketing manager, ICT director, human resources manager, finance manager and a general manager. [↑](#footnote-ref-18)
18. Information available from ACNC: Community Radio Federation Limited, Student Youth Network Inc, Ethnic Community Broadcasting Association of Vic Ltd, Triple R Broadcasters Ltd, Music Broadcasting Society of Victoria Ltd, Progressive Broadcasting Services Co Op Ltd (accessed 30 October 2019) [↑](#footnote-ref-19)
19. The licensee noted that its expenditure on staff, as reported in its 2018 AIS, incorporates human resourcing expenses and other on-costs during onboarding. [↑](#footnote-ref-20)
20. Community broadcasters with fewer employees had a higher average cost per FTE than community broadcasters with more employees. In this respect, for broadcasters of more than 8.5 FTE, the median FTE of the 6 other community broadcasters in the licence area, the average was $59,354 per FTE, with a range from $43,322 to $68,068 per FTE [↑](#footnote-ref-21)
21. For example: the 2017 CEO’s report advised ‘the future direction of Light Melbourne is to use technology to personalise the listeners’ experience and to reach more people regardless of geographical location’; and, the 2018 CEO’s ‘highlights’ included reaching over a million monthly listeners and ‘LightFM ranking in the top ten Christian stations worldwide’. [↑](#footnote-ref-22)