

Dear Sir / Madam

Thank you for the chance to comment on the matter of 4CRB wanting to change thier - community of interest.

As someone that put a lot of effort into an aspirant broadcaster (and on behalf of all that volunteered) between the years 1994 to 2001. The idea that 4CRB can change it's community of interest - YET AGIAN - is extremely aggravating. We were operating as (Gold Coast Community Broadcasters Ltd) on TCBL's attempting to give the Gold Coast a generalised service during the above period. We were eventually told NO towards the end of 2001 as the Gold Coast already had a general community station (apparently). Which was news to just about everyone on the Gold Coast but the ABA. We all knew 4CRB as the "grandparent's station". There is nothing wrong with this, but they do need to stay in thier lane!!

Most people reading this would know, a community station is licensed for a "community of interest". It's primary purpose being so the community has a voice that offers balance against the commercial offerings. Not to compete head on with the commercial services, rather compliment them. If a new board or program director etc at a "community station" wants to change the on air format, to the point where it affects thier "community of interest" then I believe a whole process needs to kick in. It can't be a simple change overnight and then business as usual. I beleive this is the point we are at.

With the GC (still to this day) not having a true general block programmed community station. It should be made very clear to 4CRB what the definition of "general" really means. Simply changing it's "community of interest" over night and thinking it can remain with it's current format is not really what "general" means. A few years after the decisions made in 2001 (to allocate 3 new community services) the "general" part was removed and was made "seniors". That in itself was annoying to know it had happened. Plus it meant the GC then had two over 55's community stations. As Radio Hope Island was licensed in 2001 in the same community of interest (all be it with a slant on jazz). ACMA needs to ask themselves - is this EFFECTIVE use of a sparse resource? I'd say no - it isn't! I'm aware that the old 94.1 FM slot is currently on TCBL.. So "technically" no full time "community of interest" really applies to that frequency at this time. I'm equally aware that 4CRB's community of interest also use to include Christian at some point. The general timeline of all these changes (at least 3 so far) eludes me.

Even to this day the Gold Coast really has a bunch of narrowcasters flying under the Community Station banner. It technically recieved 3 new narrowcasters pretending to be Community Stations back in 2001. This mistake has never been addressed. I feel very stongly that this wrong must be addressed as well. None of these stations will recieve you with open arms if you rock up with your Charlie Pride records and wanted to present a country show. Nor any other genre not listed on thier door - so to speak. You MIGHT be lucky if you rock up with the same music... But that's not community radio - it's narrowcasting. ACMA should cancel ALL Gold Coast Community licenses, reduce everyone back to running on TCBL. With the view to making the right decisions fit for "today's purpose" right down to the total number of communtiy vs commercial services in the LAP.

4CRB, should not be given an open slate. If they take this path. Their full time license should be canceled out right. Then given the option to continue on TCBL. ACMA then returns at some point later to re-assess in the same manner it would currently for a new Full Time applicant. As usual this means others can apply for TCBL's, as well as being welcome to apply when the time comes. There needs to be a VERY CLEAR line from ACMA that a Community Station is EXACTLY THAT. Plus asking to change it's "community of interest" once determined is seen as commercial behaviour by ACMA.

While I respect the fact this is some time down the road (from when I was directly involved) and listener habits have moved on. Changing one's "community of interest" as many times as 4CRB has already (3 Times that I know of - this would be 4) should be ringing serious alarms at ACMA. I would like to point out that this will set a precedent.

For example a "youth format" community station. Might be finding it hard to get members etc and wanting to open the doors wider. It's no stretch to work out that attitudes of the under 35 demographic today, could not care less about radio. This would suggest a "youth format" is more Narrowcast by definition in today's world. Equally today you wouldn't invest millions in a Hot Hits format, you would favour a Gold format if you were looking with Commercial eyes. To me this trend that "sort of suggests" the radio audience is getting older (generally speaking). It looks silly to me, that 4CRB would want to step away from "seniors".

Above all I strongly recommend that ACMA at least bring down a directive for all Community Stations. That makes it really clear changing a service's "community of interest" once determined - is seen as commercially motivated. ACMA can allow 1 or 2 tweaks from a station's initial birth to allow for changes in the listening audience. But not 4 times! I strongly feel that 4CRB has run out of chances - Big Time!

Regards

Peter Tate
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