



ACMA NEWS MEASUREMENT FRAMEWORK

About Southern Cross Austereo

Southern Cross Austereo (SCA) is one of Australia's leading media companies and the home of LiSTNR, the Hit and Triple M networks and regional television stations, reaching more than 95% of the Australian population. The LiSTNR digital audio app hosts a library of free and compelling digital audio content available anytime, anywhere. It houses SCA's 99 FM, AM and DAB+ radio stations, including AFL, NRL and international cricket coverage, 27 music genre stations, and over 600 podcasts from leading Australian and global creators, plus local news and information. With more than one million signed-in users, LiSTNR has something to entertain, inform, and inspire all Australians and helps advertisers to connect with highly engaged and addressable audiences. The LiSTNR digital audio sales network reaches an estimated 8 million people each month. SCA owns 99 radio stations across FM, AM, and DAB+ under the Triple M and Hit network brands and provides national sales representation for 56 regional radio stations, with 6.131 million listeners across the Hit and Triple M networks. SCA broadcasts 96 free to air TV signals across regional Australia and represents or has a joint venture with 39 TV stations, reaching 3.6 million people a week. SCA broadcasts Network 10 programs in regional Queensland, southern NSW, and Victoria and provides national advertising sales representation for Network 10 programming in all Australian states and territories. SCA also broadcasts and provides sales representation for Seven Network programming in Tasmania, Darwin, and Remote Central and Eastern Australia and for Seven and Nine Network programming in Spencer Gulf and Broken Hill. SCA also features Sky News Regional in regional Queensland, southern NSW, and Victoria and sales representation in northern NSW, Griffith and Mount Gambier. SCA provides Australian sales representation for global open audio platform SoundCloud and Sonos Radio. www.southerncrossaustereo.com.au.

SCA's news operations

SCA is pleased to see the ACMA reviewing media diversity and localism in Australia. SCA is "Proudly National, Fiercely Local" and has invested significantly in radio, television, and digital audio news and localism in our 57 locations around Australia.

Through our radio networks, Hit and Triple M, we deliver local news to more than 6 million Australians each week. We have 50 journalists in 47 markets and have hired another 10 journalists in the last year to facilitate our original news podcasts for LiSTNR. Through our LiSTNR digital audio app and ecosystem, we are Australia's biggest podcast company, pioneering podcasting and new ways to create digital audio content across Australia.

Although our regional television stations broadcast programming from our metropolitan program suppliers, we are committed to providing local news services for regional television viewers. The flagship is our daily one-hour live *7 Nightly News* program in Tasmania. We also produce a 30-minute news bulletin on weekdays on our Seven Network affiliated regional South Australia service, nine news updates each weekday for 13 of our Network 10 affiliated regional television areas in Queensland, southern New South Wales, and Victoria, and six news updates each weekday in Darwin. We also broadcast *Sky News Regional* in 17 of SCA's regional markets in Victoria, southern NSW and Queensland.

Industry submissions

We have had the benefit of reading submissions to be made by Commercial Radio & Audio and by Free TV Australia, and we support those submissions. We have not sought to repeat matters covered by those submissions.

In particular, we have not commented on issues in relation to data and research. However, it will be fundamental to the legitimacy of any framework for the measurement methodologies to be objective, trusted, and robust. Industry submissions make it clear the data sources mentioned in the consultation paper are likely to fall short of these criteria. While SCA would support a suitable framework, we would expect our involvement not to create an undue regulatory burden to gather, report, or verify data required for the framework.

SCA submission

Current regulation of regional broadcast media provides barriers to increasing the diversity and localism of news gathering and reporting.

Regional commercial radio and television broadcasters are required by the Broadcasting Services Act 1992 (Cth) (**BSA**) to comply with local content requirements that are inflexible and do not recognise the way modern media businesses operate nor how communities prefer to consume news and other local content. Especially for commercial radio broadcasters affected by a trigger event, the requirement to deliver a certain number of news bulletins mandates a labour intensive model that ties our journalists to their desk, effectively preventing them from gathering news, attending local council meetings and courts, and delivering greater public interest journalism. Greater flexibility in the format of how we deliver the news in particular would allow us to provide a greater diversity of opinions, voices, and stories to the communities where our journalists are based. This would also give us an opportunity to deliver “hard stories”, greater coverage of civic issues, and to uncover more stories of public interest.

The regulatory rules that largely limit “matters of local significance” to events within the licence area of each radio station fail to acknowledge the importance to local communities of national issues and, in particular, the impact of national issues on local communities. This problem would only be exacerbated by adoption of the PIJI analysis methodology that would measure news by local government area (**LGA**). Most broadcast licence areas and broadcasters’ studios and newsrooms cover several LGAs. To measure localism by reference to LGAs would risk missing the forest for the trees while encouraging an insular news service (lacking diversity of sources, content, and viewpoint) for local communities.

We also observe that, in referring to the number of “articles” published in an area, the PIJI methodology seems to focus on print media. Any methodology ultimately adopted would need to accommodate broadcast and other media that deliver news to Australian communities. In fact, the decline of print media in some of our broadcast licence areas makes the role of the broadcast journalist, and also our local radio breakfast shows, vital to media diversity and localism in those areas. These breakfast shows are not often considered in measurement of news content, despite their regular coverage of civic issues. These shows also allow us to cover a diversity of views, particularly through talkback callers and a range of interview subjects, which is harder to include in a typical radio news bulletin.

Any methodology for measuring news diversity should also recognise that most media businesses are now “multimedia”. In SCA’s case, our radio shows are available for on-demand catch-up via our LiSTNR app and station websites, our television news services are available for later viewing on

YouTube, and we produce a host of news and information podcasts available for on-demand consumption on our LiSTNR app. Our audiences are increasingly augmenting their analogue audio consumption to diversify their news consumption through podcasts.

SCA's "My Town" podcast initiative in some of our key regional licence areas shows how our local content teams are able to cover local issues and "hard news" by publishing them to the LiSTNR platform. These podcasts also cover civic issues with a diverse range of interview subjects that could not be accommodated in a typical radio bulletin.

Despite our commitment to serving our local communities with relevant and valuable news services, the commercial reality is that it is difficult to justify greater investments in regional licence areas where there is not the capacity to cover costs. Recruitment of journalists into regional areas has become increasingly challenging. The costs (predominantly rent) of living in a regional area, when compared to the wages of our journalists, makes it hard to attract journalists to the roles we are able to offer. As noted above, this is exacerbated by the regulation that restricts the way in which we are able to deliver news to local communities.

If the government aims to support media diversity, quality journalism, and localism, we see a need for regulatory reform and government funding to enable commercial media to support more journalists in more locations, especially those with relatively small populations and available revenue streams.

Issues for Comment

We've included below some comments on the first six issues for comment in the ACMA's consultation paper.

1. We can see there is merit in the proposed framework. However, achieving the key aims such as variety, range of viewpoints and greater coverage of matters of local significance will require review of current regulatory settings and a measurement methodology broader and more robust than PIJI's to recognise the diverse range of sources from which local communities draw their news. As part of this, we encourage the ACMA to consider a broad definition of public interest journalism so as not to narrow the range of sources considered in the methodology.
2. The proposed framework lacks detail about how and where relevant data would be collected. Some of the suggested methodologies lean heavily toward text based news sources, and do not fully account for audio, visual and other digital mediums. More details are also needed about how "impactful news sources" would be measured particularly in locations with small populations. News engagement needs to consider more audio based sources such as radio bulletins and podcasts.
3. We agree with professional news sources as being a key metric, even though other sources are important to the community and play a key role. Audience engagement and commercial viability are other metrics that could be considered. Given our investment in original podcasts we advocate very strongly in favour of podcasts being in scope and also for greater flexibility to define sources of local news. We also seeing increasing development of non-traditional platforms such as visualised audio, and there needs to be adequate flexibility in the measurement to cover future developments in platforms.
4. The key metrics of diversity and localism favour text based sources, and don't consider other sources of news. The definitions of diversity and localism should be broader. We support

local production as one measure, but not at risk of reducing the flexibility for media businesses to deliver news content in a range of formats with diverse voices that are attractive and valuable to audiences. Any metrics need to acknowledge the importance to local communities of covering national issues from a local perspective, as well as the importance of surfacing local issues to national audiences. Good stories relevant to local communities aren't always tied to a particular licence area or LGA but can spread across regions.

5. The framework is very skewed towards “traditional media” and in particular news mastheads. The framework needs to acknowledge the range of digital media already available and to incorporate the flexibility to accommodate platforms that will emerge in future as legitimate sources of news.
6. Any framework needs to acknowledge that technology and audience habits are changing rapidly, and any framework needs to be able to accommodate these changes. There also needs to be greater flexibility in regulation to allow broadcasters to deliver on the key objectives of greater coverage of local issues, and maintain a diversity of voices, in ways that are commercially viable and attractive to local audiences. This framework doesn't consider the commercial pressures that have developed through the last few years especially in regard to the other global influences such as the widespread use of social media as source of news. Any framework should recognise the role and importance of Australian media companies in providing trusted information and analysis that enables the effective functioning of our democracy. Issues around social media algorithms and their effect on democracy, the risk of misinformation from digital sources and social media are highly relevant to issues around public interest journalism, media diversity and localism.

24 March 2023