

Mr James Penprase
Assistant Secretary
Media Reform Branch

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

By email: james.penprase@infrastructure.gov.au



10 August 2023

Dear Mr Penprase

Transmission and Reception Audit - Scoping Paper

Thank you for the opportunity to comment on the scoping paper for the proposed transmission and reception audit. SBS is strongly supportive of the audit and the Government's undertaking to pursue a full understanding of the current state of Viewer Access Satellite Television (VAST) reception equipment in First Nations communities and to better understand the status and future for terrestrial, including self-help, facilities in remote and regional Australia.

We are largely supportive of the approach set out in the scoping paper, but wish to make a number of comments for consideration as the scope and shape of the project is finalised.

SBS would welcome the opportunity to participate and provide input and assistance, and we nominate Craig Heaton (Manager, Technical Operations – craig.heaton@sbs.com.au) and Holly Brimble (External Affairs and Policy Manager – holly.brimble@sbs.com.au) to participate in the proposed Audit Project Group. We would also support representatives from SBS's transmission services provider, BAI Communications, being included in the audit project.

As acknowledged in the paper, there are obvious challenges with this project, particularly in relation to remote First Nations communities. As the paper notes, the level of connectivity varies greatly across the communities and deriving robust sampling methodology may prove challenging in these circumstances. At the same time, there are clear logistical challenges involved in planning visits to a number of these sample remote communities. Careful planning of this element of the audit will be crucial.

We support the factors and scope of assessment for the three phases as set out in the paper. They appear to incorporate appropriate assessment criteria and guidance for decision making. SBS, in particular, highlights the need to prioritise impacts on audiences and consumers in any decision-making and assessment framework. SBS notes that the factors that might affect SBS decisions on the future of transmission arrangements may vary from those prioritised by commercial broadcasters. Content by, for and about First Nations peoples has an important place on SBS and National Indigenous Television (NITV) services, part of the SBS network; and hence the particular impact of reception and transmission issues on First Nations communities should take this into account.

As a final comment, we wish to express concern that the timeframes set out for the project may be unduly constraining. In particular, 2-3 months for Phase 1 could present as particularly difficult, especially in light of the challenges associated with proper measurement in remote First Nations communities. We query whether the project should be planned across a longer timeframe to ensure that these issues can be appropriately addressed.

Thank you again for the opportunity to comment on the scoping paper. If you have any questions or would like further information, please do not hesitate to contact me (clare.oneil@sbs.com.au).

Yours sincerely,

Clare O'Neil
Director, Corporate Affairs

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