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## Submission

# ABC and SBS: Towards a digital future



**Friends of the ABC (Victoria)**

December 2008

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## Friends of the ABC

Friends of the ABC is the major body representing the public's interest in its national broadcaster. It is a politically independent body whose aim is the maintenance of the ABC as a healthy independent and comprehensive national public broadcaster. FABC is comprised of autonomous organisations in each Australian state and territory.

## Contents

1. Overview
2. Funding, Independence & Universality
3. In-house Production
4. The ABC Charter
5. The ABC - Australia's Open University
6. ABC International Services
7. The ABC & SBS - Unique and Separate

## Overview

The ABC's importance is as a comprehensive public broadcaster that is independent and is accessible to all Australians.

The ABC is a major contributor to public debate, the maintenance of local culture and the cohesion of the nation. Its significance to the operation of our democracy and the maintenance of our culture has become so great - the result of the unhealthy state of the Australian commercial media<sup>1</sup> - that its viable future must be ensured. The ABC's strong presence is also needed to set standards for commercial broadcasters.<sup>2</sup>

FABC is concerned that:

- . the ABC does not have sufficient funding to adequately fulfil its charter responsibilities, produce quality content, and remain relevant in a technologically challenging and changing media environment.
- . the ABC's efforts to earn income through commercial activities are undermining and diverting its focus from its *raison d'être*. The national public broadcaster has been built and paid for through taxes by three generations of Australians. It is not meant to be a business. The ABC was conceived as a service to the public - an independent institution of ideas, information, education and culture that enriches the nation and the lives of its citizens.
- . while the need for the ABC has never been greater, so is the risk to its survival. It is not difficult to foresee what may happen in the future with any government antagonistic to independent public broadcasting, now that all major owners of commercial media in Australia own delivery platforms that compete with the ABC for audiences and have strong business interests in the ABC's demise.

Friends of the ABC submits that the Government should rebuild the ABC and set in place measures to ensure the ABC's healthy, independent future.

### ***Recommendation:***

- > A requirement for Australia to have an independent national public broadcaster fully funded by the federal government be included in the preamble to the Australian Constitution.

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<sup>1</sup> The lack of diversity of mass media ownership that exists in Australia is dangerous for democracy. Furthermore, the commercial media business model is increasingly unable to deliver quality local content to the broad community - a result of the expansion of delivery platforms which is leading to the fragmentation of audiences and advertising revenue, and which is now exacerbated by the present global financial crisis.

<sup>2</sup> McKinsey and Co found that public service broadcasters can and do act as regulators of the television industry as a whole. But to do this, they must have a strong audience share. *Source: Public Services Broadcasters Around the World, McKinsey and Co, 1999.*

## Funding, Independence & Universality

In spirit and at law, the ABC was meant to be independent - independent from government and from commercial influence. The ABC's independence is a prerequisite for it to produce programs of quality and integrity that reflect its charter responsibilities.

The public's trust in the ABC arises from its independence, and depends on the ABC not only being independent, but being seen to be independent.

### Funding

The ABC is grossly under-funded for the role it is required to perform, and when compared with other public broadcasters.<sup>3</sup>

Existing ABC services are suffering as the result of inadequate funding. (*Appendix B. Some Results of the Decline in ABC Funding.*) At the same time, the ABC must extend its services to meet developments in online and digital technology if it is to remain relevant.

### Independence from Government<sup>4</sup>

Past governments have sought to punish, silence and control the ABC by starving it of funding, and by targeting funds to specific areas. The capacity of governments to use funding to undermine the ABC's healthy operation and interfere in its independence must be removed.

### Independence from commercial influence

The ABC is engaging in a range of unacceptable commercial activities. (*Appendix A. Examples of the ABC's Commercial Activities.*)

The ABC was intended to be commercial-free, a role the community overwhelmingly supports.

- There should be no place for advertising or sponsorship on any part of the ABC. For the same reasons that advertising and sponsorship is unacceptable on ABC radio and television, it is unacceptable for all ABC online services.
  - The spirit and intent of the ABC Act is clear: the ABC should carry no advertising. Advertising on ABC websites is not prohibited only because ABC online services did not exist when the Act was drafted with its prohibition of advertising and sponsorship on radio and television.
  - Just as it would be unacceptable for the ABC to introduce new television stations that carry advertising, it is unacceptable for the broadcaster to run separate websites that carry advertisements, for example, its Countdown site.
  - The risk of advertising to program integrity is no less for online, than it is for radio and television, even if it was not the case that the ABC relies heavily on content shared across different delivery platforms.
  - Advertising on websites is no less intrusive than on television. Increasingly it jumps out and/or is embedded amongst content relevant to the advertisement.

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<sup>3</sup> Leaks from the KPMG Review commissioned by the former government revealed that in 2006 the ABC needed an extra \$125.8 million (after indexation) in core funding over the next three years just to maintain its present operations. ABC funding has declined out of proportion to any other major area of federal government expenditure. By 2006, the ABC's operational funding had declined by 29.7% in real terms since 1985-86. (Source: ABC Annual Report 2005) Production costs have continued to increase ahead of ABC funding since that time.

The ABC's budget is a tenth of that of the BBC, the broadcaster on which the ABC was modelled. (Source: calculations from Australian Budget papers and ABC and BBC Annual Reports.)

<sup>4</sup> This submission does not address another matter important to the ABC's independence, ABC Board appointments, because the Government has announced positive steps it will legislate to introduce in this area.

- . It is unacceptable that the ABC is engaging in commercial activities that risk influencing its content. Time and again, whether it be at the ABC or SBS, examples come to light that demonstrate that editorial independence is not and cannot be protected from the influence of commercial activities.

Dr Patricia Edgar, founding director of the Australian Children's Television Foundation, wrote: "The ABC - our public broadcaster – has become a leader in the game of licensing, transforming children's programming into merchandise driven product for the very young. The ABC continues to seek pre-school programming concepts with "broad international potential in respect of both television program sales and ancillary rights exploitation" (ABC's Release seeking program submissions). Children are treated as a market – as consumers - rather than an audience with special needs."<sup>5</sup>

- . Just as dangerous, the public's trust in the ABC's independence and integrity is being damaged by the ABC's commercial operations.

Business dealings that are effectively the ABC hiring out its trusted name are also a shortsighted solution to the ABC's inadequate funding. It is the public's trust in the ABC, which commercial operations are effectively purchasing when they use the ABC's name, and that is being steadily eroded by the ABC's association with commercial activities outside the ABC (and inside the ABC on occasions that products it advertises have no clear connection to ABC programming).

- . The ABC's need to generate revenue through commercial activities has resulted in advertising on the broadcaster's own platforms under the guise of 'promotion' or 'announcements' (so-called) to circumvent the ABC Act's advertising prohibition. This is an inappropriate use of public delivery platforms, and it is annoying to the community that funds the ABC through its taxes in the rightful expectation that the broadcaster will not seek to sell to them or disrupt their audience experience with advertisements.
- . Increasingly, the ABC is now also imitating the behaviour of commercial broadcasters on-air.<sup>6</sup>

The ABC was not established to raise money or operate as a business. Nor should it be assisting external business. The national broadcaster's focus must be restored to what it exists to do - produce and broadcast quality programming.

## Universality

The entire community must be entitled to access ABC content without direct charge. The Government and the ABC have rightly recognised the importance of online and digital technologies as an integral part of public broadcasting. The ABC cannot be allowed to charge for content delivered through them.

- . New technology should be used to encourage the access of all groups in the community to the national broadcaster. Any requirement of direct payment for ABC services risks killing off certain audiences.
- . Services that a modern public broadcaster should provide must not be misused as an opportunity to earn revenue. Online is an essential way to access the ABC in a time-poor world. ABC archival material records the history of our nation, which should be freely accessible to all.
- . The charging of a fee runs contrary to the principle of universal access which should apply to a public broadcaster. It is unacceptable to have a two-tier service, i.e., with some parts of the ABC available to all in the community, and other parts only available to those who can afford to pay for them.
- . It is unacceptable to charge for public access to content already paid for by taxpayers, and it is contrary to the ABC's responsibility to inform, educate and entertain.

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<sup>5</sup> 'News & Views', Newsletter of FABC (Vic), Autumn 2007

<sup>6</sup> Examples are included in Appendix A. Examples of the ABC's Commercial Activities

- . Furthermore, if the principle of the ABC charging for public access to its content came to be accepted, the line between what will and will not be available without cost will readily shift at a later time.
- . Response to the argument: *There is no difference between charging for ABC content online and having to pay for products at the ABC Shop.*  
There is a distinct difference between ABC Shops and online. The former is not a service that a public broadcaster exists to provide, and hence is a business activity of the ABC; and the latter is a service which a modern public broadcaster is expected to provide.
- . Response to the claim: *The public will only have to pay to access non-essential content, such as entertainment.*  
Comedy and drama which explore the human condition in myriad fashion or broaden knowledge are no less educative, cultural and essential than is factual programming. It may be through satire, for example, that some Australians will gain a greater interest in the nation's political system, or though drama, expand their insight into local history.
- . As it is in the public interest that all citizens are able to access the varied content platforms of the ABC, online access to the national broadcaster should be unmetered.<sup>7</sup>

**Recommendations:**

- > The ABC be fully and well-funded by the Federal Government.
- > Funding to the ABC be delivered in a manner that upholds the ABC's independence from government and enables effective planning, with all operational funding being delivered through base triennial funding so that expenditure of those funds is at the discretion of the ABC within the bounds of its legal obligations.
- > A legislated funding process and/or formula be introduced to ensure the ABC is well funded to fulfil its charter obligations - regardless of which political party is in government, and is guaranteed the additional funding needed to keep up-to-date with major technological change as and when it occurs.
- > The ABC Act be amended to:
  - extend the prohibition on advertising and radio to all parts of the ABC, i.e., including all ABC websites
  - prohibit on-air announcements beyond information about the ABC's own services (being services it provides as a public broadcaster, not its commercial activities), and community service announcements.
  - prohibit the ABC engaging in business activities that risk damaging public trust in the ABC's integrity or influencing its content. This includes, for example, the placement of ABC content on commercial websites or alongside commercial advertising.
  - prohibit the ABC from charging for public access to services that a modern public broadcaster should provide, so that the ABC remains accessible to all Australians, regardless of the delivery platform.
- > The Government secure for the community unmetered access to ABC online services.

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<sup>7</sup> At least one internet service provider, Internode, provided unmetered access to the ABC, until the ABC moved to a commercial web server in 2007 and it became no longer technically possible for Internode to distinguish ABC data from any other data.

## In-house Production

From the time the Coalition Government came to office in 1996, it pressured the ABC to outsource all television production other than news and current affairs. In other words, the ABC was to be privatised through the back door, with ABC television becoming a broadcaster of content produced outside the ABC. (News and current affairs was presumably excluded at the time, only because it would have made clear to the community what was happening.)

To a large extent, this has occurred, and it is still the interest of some people appointed to senior levels of the ABC in the time of the former government.

The ABC should be foremost a producer of innovative, quality content, making programs of cultural value and intellectual integrity. All news and current affairs should be produced in-house and there should be a high level of in-house production in all other program areas.

- . It is the public's expectation that the national broadcaster produce the bulk of its programming. The ABC was intended to be a producer, not simply a broadcaster of material from others. The ABC Act 1983 does not specify that the ABC is to be the producer of local programming it broadcasts, simply because it was taken for granted that this would occur. Outsourcing had not become a consideration at that time.<sup>8</sup>

The BBC was the model on which the ABC was based. It was envisaged that both would be producers of local material, not simply broadcasters.<sup>9</sup>

- . The result of a high level of outsourcing of ABC television has been:
  - in general, only light 'infotainment-style' programmes being produced by ABC TV
  - loss from the ABC of experienced and talented people from across the range of television production. With little ABC program-making still occurring, many production staff have been forced to move to commercial production companies from which the ABC buys programming.
  - the deployment of some ABC production staff to work on programming away from their areas of specialist knowledge
  - specialist program units in the ABC, for example, the ABC's acclaimed Natural History Unit, have been shut down.

The damage caused by the loss of specialist units and talented staff may not become evident in the short-term. There are presently still programs to be screened which had been commissioned by the Natural History Unit, for example, prior to its closure, and former ABC staff making programs for the ABC in the commercial production sector.

We need to be concerned about what will happen when the present generation of experienced program-makers who were nurtured or trained at the ABC retires from the industry. In addition to their direct contribution to the ABC, some of these people also guided and assisted small, independent producers.

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<sup>8</sup> In the first Australian Broadcasting Commission Annual Report to Parliament 1933, the Commission distinguishes between the role of commissioners and the staff of the ABC: "The Commission has taken the view that the function of its Members - as distinct from that of its Staff - is to supervise rather than create programs ... The staff employed has had long experience with program building ..."

<sup>9</sup> An exception in early times, prior to the ABC developing resources to seek and produce the news, was the ABC's news service which comprised reading the news from the daily newspapers.

- drama purchased by the ABC which, although it has high production values and excellent actors, is bland and formulaic. This has presumably occurred because:
  - . commercial production companies seeking to gain ongoing work with the ABC cannot take risks;
  - . programming is being produced at the outset with further sales in mind (eg. for sale, after first being screened on the ABC, to commercial pay-television or overseas markets, if not to specific buyers); and
  - . commissioning is becoming more centralised, leading to less diversity of programs and in program styles, and less likelihood of more specialised programming.

The outcome of outsourcing at the ABC looks to be not dissimilar to what happened at the BBC, even though the BBC had outsourced a considerably smaller proportion of its television production than the ABC:

Georgina Bourne, Cambridge University anthropologist and professional BBC observer, reported that outsourcing at the BBC during the 1990s had resulted in "risk-averse" centralised commissioning of programming and "decreasing autonomy for producers and writers", and had led to "lowest common denominator", "formulaic" programming.<sup>10</sup>

Sir David Attenborough said of the BBC in 2008: "The statutory requirement that a certain percentage of programmes must come from independent producers has reduced in-house production and as the Units shrank so the critical mass of their production expertise has diminished. The continuity of their archives has been broken, their close worldwide contacts lost and they are no longer regarded internationally as the centres of expertise and innovation."<sup>11</sup>

- . With secure ongoing funding and the synergies that result in a large and broad organisation, the ABC has greater capacity than commercial operators to provide a creative base, training and infrastructure to foster and develop production skills. Furthermore, the ABC has a Charter responsibility to be innovative. Risk-taking that results in edgy, polemical and provocative work, as opposed to formulaic programming, is less likely to occur in commercial operations lacking employment security and constrained by commercial imperatives.
- . There is the potential for the independence of ABC programming to be undermined by outsourcing. While ABC editorial guidelines are intended to apply to externally produced programs, it is considerably more difficult to monitor adherence to, and enforce, the guidelines when dealing with commercial producers. (*see Appendix A., item on Active Kidz and the Australian Egg Corporation for an example of what can and does occur.*)

The ABC's failure to protect its programming from commercial influence when levels of outsourcing are involved was exposed in the Palmer Inquiry into back-door sponsorship in the mid-1990's.<sup>12</sup>

- . Audiences will presumably be denied ongoing access through online to material broadcast by the ABC but produced by commercial producers, unless they pay a fee. If high levels of outsourcing of television content continue, the community may lose the access that new technology should allow them to gain to our local culture and history.

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<sup>10</sup> Dr Georgina Born BSc(Lond), PhD(Lond) is College Lecturer in Social and Political Sciences and Director of Studies; Reader in Sociology, Anthropology and Music; and Official Fellow of Emmanuel College, Cambridge University. She is the author of *Uncertain Vision: Birt, Dyke and the Reinvention of the BBC*.

<sup>11</sup> The first address in the BBC's 2008 lecture series about the role of public service broadcasting, available at [www.bbc.co.uk/thefuture/transcript\\_atten.shtml](http://www.bbc.co.uk/thefuture/transcript_atten.shtml)

<sup>12</sup> As the result of public revelations of backdoor sponsorship on ABC television, the ABC appointed George Palmer QC in 1994 to conduct an inquiry.

- . Although the former government and other bodies with vested interests have at times argued for greater outsourcing of ABC television program production, no evidence has been provided to demonstrate that the commercial sector is more cost-effective in the production of programs of comparable quality. On the contrary, it could be assumed that with the ABC's sizable infrastructure, and the experienced staffing which needs to exist for basic ABC operations, the ABC would be the most cost-effective producer in any comparison of program production of equal quality.

While studies have found that outsourcing works in some areas, for example the delivery of simple services like garbage collection, they have also found that outsourcing does not always deliver a comparable level of quality or service and, even when it does, is not always more cost-effective. On the contrary when a product or service to be produced is complex and requires greater oversight, it is not a simple process of awarding work to the cheapest bidder. Developing specifications, tendering, negotiating, monitoring and assessing can increase or duplicate work and add to the cost.

It is difficult to see how outsourcing ABC programming could be more cost-effective, given the level of input and control required of the ABC to achieve program quality and adherence to ABC editorial policies. There is no authoritative study that FABC is aware of that considers outsourcing in the Australian media industry.

- . Tax concessions, and government funding available to the commercial production sector, are effectively forcing the ABC to outsource its television production because it results in the commercial production sector being able to sell programming to the ABC considerably more cheaply than the ABC could produce itself.

In addition to the ABC's inadequate funding being addressed, this distortion of government assistance to the commercial sector - denied to, yet making its way indirectly to the ABC, and resulting in the ABC closing down its production capacity - must be reviewed.

***Recommendations:***

- > The ABC be funded to a level that enables it to:
  - continue to produce in-house all news and current affairs and no lower proportion of in-house radio and online production than exists at present; and
  - produce in-house an overwhelming majority of quality programs in all television program genres, with there being sufficient funding to ensure strong ABC production in every state of Australia so that localism is reflected.
- > The ABC Act be amended to specify the ABC's role as a producer, and its responsibility to train, develop and nurture creative talent.
- > Government assistance available to commercial producers be provided in a manner that does not result in it being cost-ineffective for the ABC to produce in-house a high level of content in any program genre.



## The ABC Charter

The ABC's Charter is a broad and encompassing document that has served the public well. It has allowed the ABC to deliver the breadth of programming and services required of a comprehensive public broadcaster. It allowed the ABC to establish a youth radio station, for example, despite youth not being specified in the Charter.

It is the lack of adequate government funding, rather than any major deficiency in the Charter that has, in the main, led to the ABC not having the extent, quality and diversity of some content and services that the community expects.

- . FABC opposes the introduction into the Charter (or other parts of the ABC Act) of quotas for content, for Australian drama, for example, because:
  - There has been no evidence produced to indicate that the ABC's failure to produce high levels of any important area of programming, such as Australian drama or documentary programs, is the result of a lack of will on the part of the ABC. On the contrary, with more funds, in the past the ABC's level of production in these important areas was greater than that of the commercial networks
  - The introduction of quotas would result in Charter areas which lack quotas being neglected in favour of areas for which quotas are introduced. All program areas left off the quota list (either deliberately or inadvertently) are likely to be disadvantaged in relation to those on it.
  - In instances of insufficient funding for the whole of the ABC, a quota which protects one ABC programming area may result in disproportionate cuts to other important areas. It may also result in resources being unfairly drawn away from some networks, eg., from radio in favour of television.
  - Quotas are a form of political interference that compromises the ABC's independence. They are a backdoor way of targeting funds, and there is a real danger that sectional political interests, rather than considerations of the public good, may influence their selection.

The ABC Chairman and Board are expected to be appointed for their expertise in overseeing a public broadcaster, and it is they who should ensure the ABC adequately meets its Charter requirements and be called to account in any instance where this does not occur.

- The ABC is the national broadcaster, and as such has a responsibility to promote Australian culture. Its production and broadcasting of Australian programs across all genres should be well in excess of the levels of commercial broadcasters. Yet, with the current trend of governments providing the ABC with as little funding as possible, a minimum quota would be in danger of becoming the maximum in reality.
- Quotas do not guarantee quality. Commercial broadcasters produce serial 'soapies' of dubious quality to help meet their Australian drama quotas. If the ABC television's present light-weight Australian programming is any indication, a quota with insufficient funds would result in low quality programming which is cheap to produce.

### ***Recommendation:***

- > No change be made to the ABC Charter.

### ***Please Note:***

It should be noted that many people in the community, including otherwise well-informed people, mistakenly refer to the ABC Act as the ABC Charter. In calling for change to the ABC Charter, their interest may in fact be for change to parts of the Act that are not to do with the charter.

## The ABC - Australia's Open University

As a major producer of quality, independent content, and accessible to all Australians without cost, the ABC already plays an important role as a lifetime educator. It is Australia's open university.

The ABC's significance grows when access to other forms of information and education are limited by cost, geographical location, disability or other factors.

With its wealth of content and experience in quality program making, and now the possibilities that television multi-channelling and online will bring, there are huge opportunities for the ABC to expand its role as an educator.

- . The ABC could produce and deliver more information for the ongoing education of Australians. For example, content for adult education, and content to assist newly arrived migrants to learn English.
- . Working in co-operation with education bodies, the ABC could deliver content for all levels of formal education, and for many more Australians not able to undertake formal tertiary education but who wish to expand their knowledge.

### ***Recommendation:***

- > ABC funding be increased to enable the ABC to expand its role as an educator

## ABC International Services

The ABC's international services, Radio Australia (RA) and Australia Network are an integral part of the ABC's services and of the broadcaster fulfilling its Charter requirement to 'transmit to countries outside Australia'. Australia's overseas broadcasters play an important role in influencing the way in which Australia is viewed in Asia and the Pacific, and are valuable bridges in regional relations, cultural understanding and trade.

- . Radio Australia's programming capacity has not been restored since the ABC's budget was cut in 1996, and its access to transmission facilities remains inadequate. It is unable to broadcast in all significant languages relevant to our region.
- RA dependence on the co-operation of foreign governments and commercial operators to re-broadcast its programs impacts on the content and extent of RA can broadcast.
- . The credibility of Radio Australia in particular, arises from the audience's perception of its independence from government.<sup>13</sup>
  - . Australia Network's capacity for independence is compromised by the need to generate commercial income, and the ABC having been selected through Department of Foreign Affairs and Trade tender to provide the Australia Network service. Its independence is further complicated by the fact that in some of the countries in which it needs to do business, commercial and political interests are closely intertwined.

### ***Recommendations:***

- > Australia's overseas television service be returned to being an ongoing service of the ABC.
- > The ABC's base triennial funding be increased so that:
  - Radio Australia's programming capacity can be rebuilt and expanded to enable it to produce the level of programs in the range of languages required for it to have a strong presence in the Asia Pacific region and to deliver programming on all platforms suited to its target audiences; and
  - Australia Network is fully funded through the ABC's funding.
- > The ABC's international broadcasters have secure access to the transmission facilities required to deliver their services.

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<sup>13</sup> This situation is unlike the US government's overseas broadcaster which is clearly identified as a propaganda arm of the US government.

## The ABC & SBS - unique and separate

It is important that the ABC and SBS maintain their separateness from each other.

- . Both public broadcasters play unique and important roles in the life of the country - the ABC as a comprehensive broadcaster which reflects the full spectrum of interests of the Australian community, and SBS with its focus on multiculturalism
- . Australia needs more media diversity, not less.
- . It is also important that the separateness of the ABC and SBS be maintained because the ABC is prohibited from carrying advertisements on radio and television, thereby protecting its independence to some extent from commercial influence, whereas SBS's carries advertising.

Already, there exists no impediment to the ABC and SBS co-operating in their operations in any instances they believe it will advance their operating efficiencies. Nothing should be done by the Government which compromises the independence of the ABC and SBS from each other or makes it a step closer for any government in the future to amalgamate the public broadcasters.

### ***Recommendation:***

- > The ABC and SBS remain separate and distinct broadcasters and no change be made to require that any operations be combined.

### ***Appendices:***

- A. Examples of the ABC's Commercial Activities
- B. Some Results of the Decline in ABC Funding

Submission to the DCITA Review: ABC and SBS: Towards a digital future.  
December 2008  
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## APPENDIX A: Examples of the ABC's Commercial Activities

The following examples have been selected to give an indication of the different types of commercial activities the ABC is engaging in.

- . The ABC sold ABC-created news updates to Media Planet, for the advertising company to draw attention to its advertising in shopping centres. Each time after the ABC news theme was broadcast to capture public attention, a twelve minute loop screened - a mash of four one-minute-long ABC updates, two minutes of commercial content, and six minutes of advertising. (August 2006)
- . There are commercial plants for sale that contain the ABC's Gardening Australia identification.
- . The website countdown.com.au, which is identified as a website of the ABC, carries commercial advertising.
- . An advertisement of ABC Enterprises requested expressions of interest in developing a program for children which would be "commercially saleable" and have potential for "ancillary rights exploitation". In other words, spin-off products, such as videos, DVDs, books, toys and other merchandise. (2004)
- . The ABC children's program *Active Kidz* was commissioned on the basis that it would have merchandise spin-offs.  
*Active Kidz* also expanded into commercial activities outside the ABC as its popularity on ABC television grew. These ranged from promoting lollies to trampolines for sale.  
The Australian Egg Corporation Ltd - which represents egg producers and on their behalf seeks to influence public perceptions about the nutritional value of eggs and the treatment of battery hens - sponsored the *Active Kids Let's Party* live country tour. (2005)
- . The ABC screened the *Bionicles* program on ABC television. *Bionicles* promotes Bionicle toys made by the Lego Corporation. (2004)
- . A presenter from the popular ABC children's program, *Playschool*, featured in an ABC 1 TV advertisement to promote children's products for sale at ABC Shops (2008)
- . The ABC has been involved in a number of magazines over recent years, some in partnership with other parties (eg., News Ltd), with the ABC effectively only providing its good name (i.e., its credibility) to the publication. Several of the magazines have become insolvent, and some several times, owing money to staff and subscribers.
- . ABC content, along with the ABC's logo, appeared alongside commercial advertising on the commercial website e farming.com.au, sold to EFarming.com by the ABC. (2008)
- . According to a report in Crikey.com, the ABC is considering offloading its book publishing arm, possibly to the News Corp subsidiary HarperCollins. If true, it would give the successful publisher a huge commercial advantage over its competitors. The publisher would presumably gain access to commercials on ABC TV, radio and online to promote books it might otherwise have decided to publish under another imprint. (Crikey.com.au, 11 December 2008)
- . On radio and television there are annoying advertisements for ABC shops and their products, frequently products that have little or nothing to do with ABC programming, eg. an advertisement for the ABC's food magazine which is a purely commercial venture. (ABC 1, December 2008)  
In a small number of instances, the price of a produce has been included in the promotion. (2008)
- . Part way into a specialist ABC radio program, the presenter promoted the ABC television series 'The Howard Years' to be screened on television, and added the comment: I can imagine it will be one of those Xmas stocking fillers under the tree this year. (December 2008)
- . Radio competitions are run, which promote prizes that are unconnected to the ABC. eg. tickets to a Bob Dylan concert. (Radio National 2008)
- . A watermark now appears on ABC television channels, which, depending on which type of television people have, can be more or less distracting. There is now a level and style of program promotion that irritates many viewers.

## APPENDIX B: Some Results of the Decline in ABC Funding

- . ABC staffing has been cut by more than 20% since 1996.
- . Diversity in presenters and programs has declined.
- . The ABC produces fewer specialist, well-researched programs.  
eg. Radio National, which already broadcasts many repeats of single programs, has announced plans to cut ten programs from its 2009 program schedule, rely on repeats from the past for a further program, and introduce only one new program.
- . We are losing Australian voices, history and perspectives as the national broadcaster is increasingly forced to rely on imported documentary, history and science programming. eg. One in every four *Four Corners* program is no longer locally produced.
- . ABC television news is increasingly reactive, with the broadcaster having insufficient resources to seek out and investigate news. An indication of this is that police stories too frequently dominate television news programs and the matters reported are increasingly dissimilar to those on commercial television news.
- . In television programming, the ABC's coverage of the arts has declined. There has been a diminution in the quality and depth of arts coverage and there is less original performance. (Source: 'Arts Programming on ABC Radio, Television and Online', Prof Liz Jacka, Mar 2004.)
- . ABC television screened only 16 hours of original local drama in 2008, significantly less than the 120 hours quota imposed on commercial networks to ensure a minimal level of Australian cultural representation.
- . Repeat programming has increased.  
eg. A sample of one week in March 2008, revealed 41 per cent of content on ABC1 television to be a repeat, compared with 19 per cent for the same week in 1998.
- . The ABC's money-making activities are corrupting the ABC's independence and interfering with its programming responsibilities. (*See Appendix A. Examples of the ABC's Commercial Activities*)
- . Radio Australia, the ABC's overseas broadcasting service, no longer broadcasts in Japanese, Cantonese and Thai.  
Its programming capacity has not been restored since the ABC's budget was cut in 1996.  
RA's capacity for shortwave broadcasts into Asia is now 56 hours a day, compared to 96 hours in 1996. (Shortwave is direct, and access to it is cheap and accessible for a large number of people.)