



## **RADIO BROADCASTERS ASSOCIATION** **RESPONSE TO “DRAFT DIGITAL STRATEGY 2.0”**

### **INTRODUCTION**

The migration to digital technology for a range of different aspects of commercial radio broadcasting is an important issue.

However, it can reasonably seem as peripheral to the “Draft Digital Strategy 2.0” This is because our digital issues come broadly in two groups – the first being those which can be managed by ourselves without any intervention by the Crown e.g. operational hardware and software, streaming of station broadcasts and creation of station-based websites. The second are those matters which do need Crown intervention but are presently covered by separate policy discussions, primarily with Ministry for Culture & Heritage and/or radio broadcasting groups within the Ministry of Economic Development.

Having said that, it may be useful to record our position on these various issues within the context of “Draft Digital Strategy 2.0”.

These are covered under the four strands identified in the Discussion Paper – Connection, Confidence, Content and Collaboration.

### **CONNECTION**

Commercial radio broadcasters have for some time been using the internet for distribution of programme content for non-HQ distribution; and for streaming of terrestrial broadcasting content.

Faster broadband certainly enhances these operations but has little incremental benefit either in broadcasting or economic performance.

We do however support the Government’s initiative in seeking higher broadband speed.

### **CONFIDENCE**

As with use of the internet noted above under Connection, the particular ICT skill sets needed by commercial radio are well understood and developed within our sector if not available from the “open market”.

Apart from general, basic skills developed by the tertiary sector, we see little need for Crown intervention in commercial radio.

## **CONTENT**

Various digital technologies are already used in creation, transfer and storage of content. Digitisation has had a significantly beneficial effect on e.g. speed and quality of creation & transfer; ease of change; ease of storage etc. We anticipate that development/improvement of these technologies will be driven by the changing needs of broadcasters and by competition amongst suppliers of hardware and software services. We see no need for Crown intervention.

Similarly, new applications of “radio like” content on the internet are developing quickly, but apart from encouraging development of better broadband speed, we see no role for the Crown.

Of the areas that should be of interest to the Crown, we suggest the first is protection of copyright. Recent amendments to the Copyright Act have quite properly strengthened the ability of copyright owners to protect their content, particularly in the internet environment.

We also see a useful role for the Crown in continuing support for local music content through NZ On Air. Digital technologies afford the opportunity to improve recording quality at lower cost and should thus be encouraged.

Perhaps the biggest strategic issue facing all radio broadcasters in the short-to-medium future will be the migration to digital broadcasting technology. The Crown, as owner of the spectrum required for this has a role in developing policy for allocation of spectrum (we have already argued for first mover status for all incumbent broadcasters, given their investment in analogue broadcasting and the costly need to simulcast for many years) and facilitating and chairing the debate over the technology to be used.

While in their early stages, both issues are already under consideration by the Broadcaster’s Consortium and key Crown agencies – Ministry of Economic Development and the Ministry for Culture & Heritage.

## **COLLABORATION**

While radio broadcasting is intensely competitive, areas of common interest and in particular the migration to digital broadcasting are already the subject of industry collaboration.

The Digital Broadcaster’s Consortium was formed in 2007 and includes commercial broadcasters (through the industry association, Radio Broadcasters Association), Radio New Zealand, community/access stations, iwi and student broadcasters. It has successfully functioned as a means of information sharing on digital developments elsewhere in the world and has

been a forum for presentation of trial results in New Zealand – the HD trial at Sky Tower conducted by the RBA and the lower power trial by Kordia at Waiatarua in Auckland.

The RBA also meets on a monthly basis with officials from the Ministry of Economic Development with digital broadcasting being a more-or-less permanent agenda item.

## **CONCLUSION**

Commercial radio broadcasters are unpersuaded that the scope of “Draft Digital Strategy 2.0” has anything other than peripheral relevance for our sector.

For the most part, competition in the marketplace is providing ever-improving hardware and software options for our sector. And in the two major areas where the Crown will impact on our migration to digital – policy on frequency allocation and the technology chosen, processes are already established and operating via the Ministry for Culture & Heritage and the Ministry of Economic Development.

Nonetheless, the RBA thanks this particular project team for the opportunity to take part and wishes to be kept informed of the development of “Draft Digital Strategy 2.0”.



David Innes  
**EXECUTIVE DIRECTOR**