

PROTECTING CRITICAL INFRASTRUCTURE AND SYSTEMS OF NATIONAL SIGNIFICANCE

SUBMISSION BY COMMERCIAL RADIO AUSTRALIA

September 2020

Commercial Radio Australia (**CRA**) is the peak industry body representing the interests of commercial radio broadcasters throughout Australia. CRA has 260 member stations, comprising 99% of the Australian commercial radio industry.

CRA welcomes this opportunity to respond to the Department of Home Affairs' Consultation Paper on *Protecting Critical Infrastructure and Systems of National Significance* (**Consultation Paper**).

CRA notes that the object of the review is to:

*work together now to ensure Australia's security practices, policies and laws bolster the security and resilience of our critical infrastructure and position us to act in any future emergency.*¹

The commercial radio industry is one of the nation's major information sources during crises and plays a vital role in communicating messages in emergencies. Its infrastructure should be protected as a priority in the event of an emergency.

Broadcast media is the most effective means by which Government and emergency service organisations communicate with the public when critical events occur. Commercial radio plays a particularly important role, as both metropolitan and regional surveys show that around 80% of Australians listen to commercial radio. There are 220 regional commercial radio stations.

CRA submits that broadcast communication function during emergencies may be protected in 4 key ways:

- (i) prioritisation of radio broadcast infrastructure protection by emergency services in times of emergency;
- (ii) establishment of broadcast redundancy arrangements, assisted by government, to ensure stability and security of communication during emergencies;

¹ Page 4, Consultation Paper.

- (iii) implementation of a formal policy to facilitate access by broadcasters to undertake repairs or maintenance to broadcast infrastructure during emergencies; and
- (iv) improvement of NBN resilience to make the NBN system a reliable source of landline and internet communications for broadcasters during emergencies.

1. Regulatory framework

We set out below the commercial radio industry's legal obligations in times of emergency. This demonstrates to the Department the close relationship between emergency service agencies and the commercial radio sector in communicating messages to Australians in times of crisis.

Commercial Radio Code of Practice

Commercial radio stations must adhere to the *Commercial Radio Code of Practice*.

Code of Practice 7 sets out commercial radio broadcasters' obligations in relation to the broadcast of emergency information. Specifically:

A licensee will, in consultation with appropriate emergency and essential service organizations, implement a set of internal procedures to enable the timely and accurate broadcast of warnings and information supplied by such organizations relating to an existing or threatened emergency.

All commercial radio stations are bound by this Code.

Memoranda of Understanding

As a result of the recommendations of the Victorian Royal Commission into the 'Black Saturday' fires in Victoria, CRA entered into Memoranda of Understanding (**MoU**) with emergency service authorities in NSW, VIC, QLD and SA. These set out protocols, communication channels and protocols for the communication of emergency information over commercial radio stations in disaster affected areas.

The commercial radio industry has now entered into MoUs in New South Wales, South Australia and Queensland. Western Australia and Tasmania are the only States that do not have an MoU in place. The commercial radio industry has offered to enter discussions regarding an MoU with these governments.

The bushfires in 2019/20 highlight the importance of having an emergency communication process that is as effective as possible. The MoUs assist in achieving this, by setting out communication processes and protocols for a collaborative approach to the broadcast of emergency information.

2. Infrastructure repair and protection

It is vital that radio broadcast infrastructure is protected and repaired as efficiently as possible during any emergency so that commercial radio broadcasters can carry out their obligations under the MoUs and the Commercial Radio Code of Practice.

We urge the Department to extend its review beyond telecommunications companies to include broadcast radio communication. Commercial radio broadcasters must have adequate infrastructure and redundancy arrangements.

Our member networks have provided information on their experience during the 2019-20 bushfires:

- BAI Communications manages SCA's infrastructure. SCA were able to leverage BA's capabilities which meant it had fire drops on sites, access to sites by helicopters and priority access through road blocks.
- Only a small number of SCA services were impacted and these were generally low population area, the impact was generally due to lack of standby power.
- In some cases, SCA understands that BA was hindered in obtaining access to bushfire areas and was delayed in getting to sites to restore emergency broadcast services. We suggest that a formal policy to facilitate access for broadcast repairs should be implemented by emergency services.
- In January 2020, the Comberton fire threatened areas surrounding Grant Broadcasters' AM transmitter and the fire itself interrupted power to that area. Grant Broadcasters had to ensure that the transmitter had enough reserve diesel to keep them on-air. This was particularly difficult as they had no access to the transmitter due to road closures.

These challenges might be improved by the following:

- (i) implementation of a formal policy to facilitate access by broadcasters to undertake repairs or maintenance to broadcast infrastructure during emergencies;
- (ii) prioritisation of radio broadcast infrastructure protection by emergency services in times of emergency; and
- (iii) establishment of broadcast redundancy arrangements, assisted by government, to ensure stability and security of communication during emergencies.

3. NBN resilience

Broadcasters rely on the NBN system as the only source of landline communications during emergencies.

CRA would like to understand whether the NBN infrastructure is designed with adequate backup in the event of a power failure. If not, it would mean that the current system of email alerts, notifications and warnings to local stations by emergency service agencies would not

be operational. Nor would stations be able to visit emergency service websites for updates as an alternative.

Listeners, the general public and emergency service agencies frequently contact stations using landline telephones and the internet during emergencies. This mode of communication must be reliable during emergency events if radio is to contribute to the fullest extent during emergencies.

CRA would like the Department to review the issue of NBN resilience urgently and implement any steps necessary to ensure it remains operational during times of crisis, when it is most needed.

Please contact Joan Warner, on [REDACTED], for clarification on any aspect of this submission.

Commercial Radio Australia