

17th June, 1985

Mrs. Lena Gustin,
102 South Terrace,
BANKSTOWN. N.S.W. 2200

Dear Mrs. Gustin,

re: SYDNEY COMMERCIAL TELEVISION LICENCE RENEWAL HEARINGS

You may be aware that this firm and its principal, Mr. Antony Luciano have been granted status to make submissions to the Sydney Commercial Television Licence Renewal Hearings commencing on 1st July, 1985 concerning Ethnic programming on commercial television.

This is the first occasion upon which an individual has been granted such status and is the first time that the Ethnic community has been given an opportunity to persuade the Tribunal that current commercial television programming does not cater adequately to the needs of Sydney's Ethnic Communities.

Accordingly, this is a unique opportunity for the Ethnic Communities to insure that commercial television begins to cater to their needs as it does to other sections of the community.

In essence, the submissions which we are going to put to the Renewal Hearings is that:-

- a. The Sydney stations have failed in their obligation to provide "adequate and comprehensive programming" in that they have failed to provide Ethnic programming.
- b. The licensee should be required to undertake to remedy this deficiency; failing such undertaking that a condition upon their licences be imposed, requiring them to provide reasonable amounts of Ethnic programming.

We will be emphasising to the Broadcasting Tribunal at these hearings that the commercial stations will not achieve the requirement of catering to the Ethnic Communities by simply acquiring non-English language programming overseas. As

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with Children's programming which, as you will be aware, has a special quota system on commercial television, we will be suggesting that locally produced Ethnic programming should be included in programme schedules, if necessary by a compulsory quota system.

We will not be suggesting that vast amounts of prime time television should be taken up with non-English language programming. On the contrary, we will be suggesting that Ethnic programming should be programmed at "an appropriate time" for the communities to whom it is directed. We accept that this may often be during daytime, on weekends and late at night. We also accept that only the major Ethnic groups will have access to programme time other than brief inclusions in magazine type programmes.


Furthermore, we will not be suggesting that members of the Ethnic Communities are not interested in general English language programming or that they are substantially unhappy with that programming currently appearing on commercial television. We will simply be suggesting that the Ethnic Communities are entitled to some specifically directed programming, just as those interested in horse racing, rugby league and some specific cultural activities receive specifically directed programming. Quotas for Religious and Children's programming exist as well as for Australian Drama. We believe it is not unreasonable for similar quotas to apply to Ethnic programming.

In order for our case to succeed, it will be essential for us to demonstrate to the Tribunal that we have broad based support in the Ethnic Community for the propositions which we are putting. The Tribunal is not going to require a significant change in current programming practices if it believes that our submissions are simply those of one small company and its proprietor.

We urge you to write a letter of support substantially in the terms of the draft letter annexed, and send it to this company as soon as possible. The Tribunal has asked us to indicate within a few days what support we have. Please do not copy the draft letter exactly since it would be unfortunate if all our letters of support were in identical terms. However, it is important that you cover the principal points set out in that draft letter.

If you have any questions concerning your involvement in this activity, please contact the undersigned at your convenience. I urge your support and request that you give it not later than 24th June, 1985.

Yours sincerely,


A. LUCIANO
Managing Director & Executive Producer

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enc.

The Chairman,
Australian Broadcasting Tribunal,
153 Walker Street,
NORTH SYDNEY NSW 2060

Dear Sir,

SYDNEY COMMERCIAL TELEVISION LICENCE RENEWAL HEARINGS

We understand that your Tribunal has granted leave to Mr. A. Luciano and Panorama Productions to make a submission to your Tribunal's enquiries into the renewal of the licences of Sydney television stations, TCN-9, ATN-7 and TEN-10. We have considered the issues which Mr. Luciano proposes to raise with your Tribunal and fully support them.

We believe that it is important that your Tribunal take into account the following matters:-

3) a. With the termination in 1984 of the programmes known as Variety Italian Style, The Harry Michaels Greek Variety Show and Let's Go Greek Endaxi, there is no locally produced Ethnic programming on Sydney commercial television stations.

b. Although there is some coverage of Ethnic affairs in news and current affairs programming, we do not believe that this adequately services the needs of the many thousands of people who are first and second generation migrants.

1) c. Since many of these migrants have been away from their native countries for a number of years, it is not sufficient for commercial television stations to simply show programming originating in those native countries. What is required is locally produced programmes which incorporate material produced in those native countries but flavoured and slanted to the interests and needs of members of the Ethnic community, resident in Australia.

2) d. Our organisation has for many years supported these principles and notes with dismay that none of the commercial television stations appears to have responded to these needs. Accordingly, we believe that the time has come for your Tribunal to require the Licencees, the commercial television stations, to undertake to provide Ethnic programming failing which, we believe your Tribunal should impose conditions on their licence, requiring such programming to be telecast.

It is not our intention that programming of specific interest to only minority groups should occupy substantial amounts of prime time commercial television programming. We wholly accept that such programming should be shown at appropriate times so as not to cause offence to non-Ethnic members of the viewing audience.

However, we would oppose a specific time channel being allocated for Ethnic programming since we do not believe that it is in the interests of the Ethnic community to have all three channels showing Ethnic programming at exactly the same time.

Finally, we believe that coverage of sporting events which are commonly perceived to be of more particular interest to non Anglo-Saxon Australians should not be sufficient to fulfil an Ethnic programming requirement. What is required is variety, entertainment, information and cultural programming which is to some extent in non-English language and which is tailored to the interests of non-English speaking Australian residents and their families.

We commend to you Mr. Luciano's submissions and urge your Tribunal to react positively to them.