



# Radio Northern Beaches

88.7 and 90.3 FM

[www.rnb.org.au](http://www.rnb.org.au)

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ABN 79 408 727 567

Manly-Warringah Media Co-operative Ltd

Licensee of (2MWM FM) - Radio Northern Beaches

Correspondence: The Secretary, P.O. Box 221 Belrose West 2085

Studio Location: 8-12 Yulong Ave, Terry Hills 2084.

Email: fill out online form [www.rnb.org.au](http://www.rnb.org.au)

Studio: 9451 4887 Sponsorship: 9453 4903

10<sup>th</sup> April 2019

Rental Arrangements for Communication Towers on Crown Land  
Independent Pricing and Regulatory Tribunal  
PO Box K35  
**Haymarket Post Shop NSW 1240**

To whom it concerns

I write on behalf of the Board of Directors who represent the members of the Manly Warringah Media Cooperative Ltd t/a Radio Northern Beaches (hereinafter "RNB"), in response to IPART's request for submissions around the Rental Arrangements for Communication Towers on Crown Land review.

RNB is a small but effective Community Radio Station licensed and endorsed by the Australian Communications and Media Authority. Its studios are at Terrey Hills on Sydney's Northern Beaches and uses a broadcasting antenna installed on a timber communications pole (shared usage with a mobile phone company) situated on Crown Land at Ingleside, also on Sydney's Northern Beaches.

In 2016, The NSW Dept of Industry (aka Crown Lands) started to charge all users of any tower on Crown land, a rental fee of approximately ~\$28,000pa and offered selected community groups (such as RNB) a rental rebate equating to approximately 99% of the annual rental fee.

For the initial 40 years of RNB's operation, no rental fees were requested, nor paid for the use of the antenna site. Whilst RNB can sustain a modest rental at current levels, its revenues do not support operations if that rental rebate is discontinued. **RNB's submission to IPART seeks to ensure that this rental-rebate arrangement continues. Put simply, if it does not continue, RNB will be forced to close its doors after a proud 44-year history serving the local community.**

We note that in the Submission paper's Terms of Reference from the Premier, that "*the fee schedule may provide for rebates.*". Specifically:

1. Para 2.4.2 of the IPART submissions paper: "The current rebate schedule applies to eligible users (Table 2.4), and rebates are granted at the discretion of the relevant Minister. The rationale for these rebates is that some users provide a social or community benefit in excess of their ability to generate revenue from the service they provide. These groups include community organisations, emergency services, local service providers and some telephony service providers required by law to offer services in low-density areas."
2. Table 5.2 (p25) of the IPART submissions paper:
  - **User type Rebate:** Community groups
  - **Rebate** (% of applicable fee): ~99%
  - **Description and rationale for rebate:** *Cater to special interests and are run on a not-for profit basis. The services they deliver offer social and community benefits.* The level of rebate is designed such that the effective rent is generally sufficient to compensate the land management agencies for the administrative costs associated with the use of the site

In support of RNB's qualification under those guidelines, we offer that RNB provides a valuable and vital community resource.

1. RNB is not-for-profit community group that is *100% volunteer operated*. RNB has no paid employees.
2. RNB provides a service and gives voice to all community members including the disabled, youth, elderly & ethnic groups *promoting inclusion, diversity, and cultural growth on the Northern Beaches*.
3. *RNB is a visible and vital member of its local community*.
  - a. Each week, RNB broadcasts fifty (50) unique local programs, generating sixty-five (65) hours of new content. The programs represent a broad spread of music, news, talkback, ethnic programming and special interest groups.
  - b. RNB's Outdoor Broadcast facility (aka 'the Big Yellow Van') is a regular fixture at community events up and down the Northern Beaches, broadcasting live from those events via mobile link to the shared broadcast antenna in question. Upcoming events include Lifeline's Surf Classic on April 28<sup>th</sup> 2019 at Queenscliff but also have historically (past 7 years) included dozens of car shows, music festivals, Food & Wine festivals, Market Days, Brookvale Shows and more. RNB regularly broadcasts live-to-air from local live music venues.
  - c. RNB provides regular and ongoing media training as an accessible entry point for those seeking a career in radio. RNB's most recent graduate of their intern program recently (March 2019) found paid employment with a commercial station in South Australia as a breakfast announcer; as a direct result of skills learnt at RNB.
4. *RNB is 100% self-funded*. RNB's annual revenue averages \$34,000 pa and is derived from membership fees, commercial sponsorship (limited by ACMA advertising rules), fee-for-service community training days and other community fundraising activities such as trivia nights, raffles etc.
5. Prior to 2016 RNB were not required to pay any Crown Land fees to position our broadcast antenna on a council owned pole. In 2015, RNB was compelled to execute an agreement with Crown Lands; and from 2016 RNB has been invoiced (by NSW Dept of Industry) \$28,759 pa for pole-rental; with a community-based rebate of \$28,229 pa. In effect RNB pays \$530 per year for having our antenna on the council's pole.
6. The actual space RNB occupies on the pole is approximately 1 square metre of shared (non-exclusive) use.

The existence of the rental rebate provision goes directly to the heart of RNB's financial viability.

- RNB has been in operation for 44 years, forming in 1975.
- Should the rebate for community groups be discontinued or be modified in such a way as to significantly increase the rental fees payable, Radio Northern Beaches will have no option but to cease operations.

**We request that the rebate for community groups continue to exist (or be styled otherwise) such that the effective rental to be paid by RNB is maintained at approximately \$500 per year.**

Thank you and warm regards



**Narelle McGeoch**  
**Chair**  
**Manly-Warringah Media Co-operative Limited**  
**t/a Radio Northern Beaches**

Encl. ASIC Company Extract @ 10<sup>th</sup> April 2019.



**ASIC**

Australian Securities & Investments Commission

## Business Name Details

Extracted from ASIC's database at AEST 16:03:54 on 10/04/2019

**Business name:** RADIO NORTHERN BEACHES

**Status:** Registered

**Registration date:** 30/05/2011

**Renewal date:** 30/05/2020

**Address for service of documents:** PO BOX 221 Belrose NSW 2085 Australia

**Principal place of business:** Terrey Hills Senior Citizens and Youth Centre 12 (street number) 12 Yulong Ave Terrey Hills NSW 2084

**Holder(s) details:** Holder name: MANLY-WARRINGAH MEDIA CO-OPERATIVE LTD

Holder type: Other Unincorporated Entity

**Debtor representative(s):** not applicable

**Notified successor(s):** not applicable

**Regulator:** Australian Securities and Investments Commission

**Former State/Territory registration details:**

**Former identifier:** BN98572975

**Former State/Territory:** NSW