

Discussion Paper on Low Power Sound Broadcasting

28 FEBRUARY 2003



Independent
Communications
Authority
of
South Africa



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Any interested person or organisation who submits written representations should indicate whether they require an opportunity to make oral presentation at the hearings.

The closing date for the receipt of representations is **04 April 2003**

1. INTRODUCTION

Aims of the Discussion Paper

The purpose of this Discussion Paper is to generate comments from all stakeholders on issues surrounding the regulation and licensing of low power radio broadcasting as required by section 5(2)(j) of the Broadcasting Act of 1999.

The Discussion Paper's primary aim is to solicit participation and input in the formulation of the policy and licensing frameworks for low power radio broadcasting.

The Discussion Paper is structured in the form of questions supported by explanatory and contextual discussion. Questions posed are not all-encompassing. The Independent Communications Authority of South Africa ("the Authority") would welcome any input on issues related to the regulation of low power radio that stakeholders feel the Authority may have neglected.

The Authority invites interested parties, stakeholders and the public to respond to the issues and questions raised in the Discussion Paper. Public hearings to further explore the issues raised are expected to be held during the first half of this year. The Authority will then publish the Position Paper and regulations later this year.

2. BACKGROUND

The Authority has been inundated with queries regarding the licensing of low power radio in South Africa. To this end, the Authority informed aspirant broadcasters of a lack of a regulatory and licensing frameworks. In its three-year plan, the Authority stated its intention to conduct an inquiry into low power sound broadcasting in the 2003/2004 financial year in order to establish a regulatory and licensing framework for such services. This inquiry is being conducted in terms of section 28 of the Independent Broadcasting Authority Act ("the IBA Act") 1993, as amended.

The Broadcasting Act, 1999, requires the Authority to license low power sound broadcasting as a class of licence. Section 5(2)(a) of the Broadcasting Amendment Bill, 2002, states that broadcasting licences are categorised as:

- (a) free-to-air broadcasting services;
- (b) terrestrial subscription broadcasting services;
- (c) satellite subscription broadcasting services;
- (d) cable subscription broadcasting services;
- (e) low power sound broadcasting services; and
- (f) any other class of licence prescribed from time to time.

Furthermore, both the IBA Act and the Broadcasting Act require entities wishing to operate broadcasting services in South Africa to have a licence.

The IBA Act provides for three tiers of broadcasting — community, public and commercial — and requires the broadcasting services to:

“promote the provision of a diverse range of sound and television broadcasting services on a national, regional and local level which, when viewed collectively, cater for all language and cultural groups and provide entertainment, education and information” (section (2)(a))

“promote the development of public, private and community broadcasting services which are responsive to the needs of the public” (section (2)(b))

The licensing of community radio stations brought a new dimension to the broadcasting landscape of South Africa. Not only did the community radio sector bring diversity and choice to audiences, but also competition for both the commercial and public broadcasters who now have to compete for audiences and market share.

The licensing of low power radio and new commercial sound stations will lead to more competition for audiences and market share.

One of the challenges for the Authority will be to draw a distinction between low power radio services and community radio services. Although the IBA Act and the Broadcasting Act are very specific as to what constitutes a community broadcasting service, the distinction between community radio services and community low power radio services seems to be blurred and there is a perception that this class of licence is a duplication of what is already in place. Section 1 of the Broadcasting Act defines a community broadcasting service as a service which:

- (a) is fully controlled by a non-profit entity and carried on for non-profitable purposes;
- (b) serves a particular community;
- (c) encourages members of the community served by it or persons associated with or promoting the interests of such community to participate in the selection and provision of programmes to be broadcast in the course of such broadcasting service; and
- (d) may be funded by donations, grants, sponsorships or advertising or membership fees, or by any broadcasting service.

The Authority’s Position Paper on four-year Community Sound Broadcasting Services, 1997, makes a distinction between a geographical community and a community of interest.

- **Geographical community**

This type of service is geographically based and caters for persons or a community whose communality is determined principally by their residing in a particular geographical area.

•Community of interest

This service caters for a community which has a specific definable common interest such as institutions, religious and cultural communities.

The Broadcasting Act, 1999, defines a low power broadcasting service as a community, private or public sound broadcasting service that radiates power **not exceeding one watt**.

The Broadcasting Act defines the low power sound broadcasting service a service whose power does not exceed one watt and can either be public, community or commercially owned.

Q.2.a. Is the Act's definition of low power sound broadcasting sufficient or are there other issues the Authority should include in the definition?

Q.2.b. How should public low power, commercial low power and community low power be defined?.

Q.2.c. Since the coverage of low power broadcasting is limited to one watt, how best should the Authority address the licensing of community and public low power broadcasting services?

Q.2.d. What should the differentiating feature be between a community broadcasting service and a low power sound broadcasting service, if any?

Q.2.e. The Broadcasting Act provides for the licensing of private low power broadcasting. Should similar commercial standards that apply to commercial broadcasters also apply to private low power broadcasting?

3. THE ROLE OF BROADCASTING IN SOCIETY

There can be no democracy without freedom of the press and the free flow of ideas by word or image. And there can be no free press and true democracy without well-informed readers, listeners and viewers. Responsible and informed citizens are the best shield of democracy¹.

Broadcasting plays a vital role in the lives of citizens. Not only does it entertain, inform and educate, but it also provides citizens with the necessary information that will enable them to make appropriate decisions. In South Africa broadcasting's role is extended further to address issues of nation-building. The role of broadcasting is all the more important in providing information so that people can participate in the processes of development and nation-building.²

¹ Federico Mayor, 1996, Media and democracy in Latin America and the Caribbean. Unesco.

² IBA Triple Inquiry Report, August 1995

For broadcasting to achieve objectives of nation-building and ensure that broadcasting services cater for public interest, the Authority has identified the following as the role of broadcasting in South Africa:

- **Access:** Broadcasting services should ensure that citizens have access to different forms of broadcasting services in order to assist them to make informed decisions.
- **Diversity:** Broadcasting services should provide diverse services for citizens to have choice and different voices and opinions.
- **Equality:** This principle argues for the fair and equitable treatment of languages, political parties and different groups by broadcasters in order to correct historical imbalances and level the playing field.
- **Independence:** The media should be independent of political interference in order to ensure editorial independence.
- **Unity:** The media should assist in nation-building by enriching and strengthening the cultural, social and economic fabric of South Africa.

Part B

4. LEGISLATIVE FRAMEWORK

4.1 Broadcasting Act of 1999

Section 5(1) of the Broadcasting Act, 1999, states the following:

"Subject to the provisions of this Act, the Authority may, on such conditions as it may determine, issue a sound or television broadcasting service licence for a specified area in the following broadcasting service categories:

- (a) A public broadcasting service;
- (b) a commercial broadcasting service; and
- (c) a community broadcasting service."

Section 5(2) states the following:

"Subject to the provisions of this Act, the broadcasting licences are categorised in the following classes:

- (a) Free-to-air radio service;
- (b) free-to-air television service;
- (c) satellite-free-to-air radio service;
- (d) satellite free-to-air television service;
- (e) satellite-subscription television service;
- (f) terrestrial-subscription television service;
- (g) direct-to-home delivery service, including multi-channel satellite distribution;
- (h) local delivery service;
- (i) cable television subscription service;
- (j) low power radio service; and
- (k) any other class of licence as determined from time to time."

4.2 IBA Act of 1993

Section 2 requires the Authority to:

- "(a) promote the provision of a diverse range of sound and television broadcasting services on a national, regional and local level which, when viewed collectively, cater for all language and cultural groups and provide entertainment, education and information;
- (b) promote the development of public, commercial and community broadcasting services which are responsive of the needs of the public;"

4.3 Constitution of South Africa

The Bill of Rights is seen as the cornerstone of democracy in South Africa enshrining the rights of all people and affirming the values of human dignity, equality and freedom. The following provisions of the Constitution, taken within the context of Broadcasting Regulations, outline the symbiotic relationship between the environment in which the processes of policy formulation take place.

- Access to information
- Freedom of expression
- Equality

4.3.1 Access to Information

According to the Bill of Rights, everyone has the right of access to:

- (a) any information held by the state
- (b) any information that is held by another person and that is required for the exercise and the protection of any rights

In South Africa, it is desirable to expand the concept of access from the right to receive information to include greater access to the means of production in broadcasting. While the original concept of access informed the need for a public service broadcaster and indeed in free market systems for private broadcasters, the expanded concept has justified the development of community stations and public access programmes on private and public service stations and channels.

4.3.2 Freedom of Expression

The Constitution outlines freedom of expression as everyone having the right to:

- (a) freedom of the press and other media;
- (b) freedom to receive and impart information and ideas;

- (c) freedom of artistic creativity; and
- (d) academic freedom and freedom of scientific research.

4.3.3 Equality

The Bill of Rights promotes equality by stating that “Everyone is equal before the law and has the right to equal protection and benefit of the law” (section 9(1)).

Section 9(2) of the Constitution extends this equality to the full and equal enjoyment of all rights and freedoms.

According to the Authority’s Triple Inquiry Report, 1995, the concept of equality is interchangeably used with the concept of proportionality. From this perspective, it is argued that the media should reflect the demographics of society. From the development perspective, the notion of equality is important in “levelling the playing fields” in the broadcasting industry by encouraging new entrants into the market.

5. COVERAGE

In the Triple Inquiry Report, the Authority stated that public radio stations, when viewed collectively, should provide a full spectrum service of information, education and entertainment. To this end, the SABC has not yet achieved its stipulated coverage of meeting 90% of the population’s needs. This results in unbalanced access to broadcasting services.

Under the Broadcasting Act, 1999, low power radio must cover a radius not exceeding one watt. In itself, one watt is minute coverage and will not interfere with other broadcasters, nor make any impact on the broadcasting landscape.

In countries that we have looked at, low power sound broadcasting service’s coverage exceeds one watt. For instance, in the United States, the minimum coverage is 100 watts, while in Canada different low power radio services are allocated different effected radiated powers (ERPs). For instance:

- low power AM has a coverage of 100 watts;
- low power FM has a coverage of 50 watts;
- very low power FM has a coverage of 10 watts; and
- low power announcement service has less than 10 watts.

In Australia open narrowcasting services are received only within the perimeters of the specific location and are limited to 10 watts or less.

Section 31(1) of the IBA Act, 153 of 1993, states the following:

"The Authority shall as soon as may be reasonably practicable after commencement of this Act prepare a frequency plan whereby the maximum number of frequencies available for broadcasting services is determined."

Section 31(5)(a) further stipulates that the plan must be reviewed annually.

Q.5a. By allowing broadcasters to broadcast on one watt, how will this address the issue of access to diverse services and universal access? In your opinion, can the Authority achieve the objects as set out in both the IBA and Broadcasting Acts?

Q.5b. As more frequency assignments or allocations are made and new broadcasters appear on air, there is a likelihood that interference levels will increase. In the case of such an event, what remedy/remedies should the Authority apply to correct this situation?

The 2002 frequency plan specifies service contour values for the different broadcasting bands. In the FM band, the plan provides for 48dBuV/m and 60dBuV/m for monophonic systems in the rural and urban areas, respectively, and 54dBuV/m and 66dbuV/m for stereophonic systems in the rural and urban areas, respectively.

Q.5c. At what level of contour value should low power broadcasting service be set?

The Broadcasting Act does not determine the antenna height for low power sound broadcasting. Antenna height above average surrounding terrain is important for frequency co-ordination. As a result, it becomes important that this height be defined for low power sound broadcasting. Currently, the antenna height above average terrain is limited to 10 meters.

Q.5d. Should this value be increased or decreased?

Q.5.e. Since low power broadcasters will be using a frequency to broadcast, should they be expected to pay fees? Please give reasons for your answer.

Q.5.f. If your answer to Q.5e. is yes, how much? If it is no, why not?

Part C

6. REGULATING THE LOW POWER BROADCASTING SERVICE

Low power sound broadcasting was introduced in different countries for different reasons. For instance, in the United States this form of broadcasting was introduced because big networks were not catering for the minorities and there seemed not to be a diverse voice and choice of services. Another reason for the introduction of low power radio was that there were many illegal low power radio stations and the Federal Communications Commission (FCC) wanted to bring them in line with regulations.

6.1 United States of America

In the United States, low power broadcasting was first mooted by the then FCC's chairperson, William Kennard. According to Kennard, this type of media would bring a different face to the media industry of the USA. There were strong arguments against this phenomenon, especially by the network operators who saw low power radio or micro-radio as a threat to them in the sense that it could cause interference with the licensed services and would steal their listeners. FCC disregarded the above allegations and ruled that the low power FM (LPFM) service would benefit listeners in low-income, minority communities as well as the larger listening public, and that minority-owned stations would not have to compete with LPFM stations for any advertising dollars since the new LPFM service would be non-commercial.

The purpose of introducing low power radio was to give local communities a voice that would address their needs. Low power radio is licensed for non-commercial educational broadcasting only. For instance, these services are generally licensed to local schools, clinics, churches, community groups and entrepreneurs, and are prohibited from any form of commercial activity.

Low power radio operates on an ERP of 100 watts or less with the maximum facilities of 100 watts of ERP at 30 meters antenna height above average terrain. The approximate service range of a 100-watt LPFM station is 5.6 km.

In addition, low power stations are not protected from interference that may be received from other FM stations.³

6.2 Australia

³ <http://www.fcc.gov/mb/audio/lpfm/index.html>

Australia's Broadcasting Services Act of 1992 makes provision for the low power broadcasting defined as narrow casting broadcasting (section 18):

- (i) whose reception is limited and
- (i) they provide programmes of limited appeal,
- (ii) are targeted to a specific interest group and
- (iii) intended for only limited locations, i.e. sports arenas and business premises during a limited period.

Criteria (i) and (iv) in this Act (section 18(a)) concern services whose reception is limited because they are:

- are targeted to special interest groups or
- provide programmes of limited appeal

They state that set criteria are crucial to determine clear common understanding of the limits of what can be done by radio services within the open narrowcasting category.

In addition to the set criteria, the following issues were identified as important in the clarification and consideration of special interest groups and programmes of limited appeal:

- (i) The nature of the audience at whom those services are targeted;
- (ii) The nature of the programmes being provided by those services, including:
 - (a) the level of interest in the subject matter of those programmes;
 - (b) whether those programmes are directed at a specialised audience; and
 - (c) the social and cultural impact of those programmes.

In deciding the category of a broadcasting service the Australian authority stated that the character of the whole service should be taken into consideration, not just the particular programme elements, target special interest groups or whether the programmes are of limited appeal. This is of particular importance when questions arise about open narrowcasters who appear to be operating as commercial broadcasting services.

6.3 Canada

In 1993, the Canadian Radio-Television Telecommunications Commission (CRTC) published an amendment to its Licensing Policy for Low Power Radio. Low power radio has existed for over a decade in Canada and has not caused any interference in their broadcasting system. The aim of low power broadcasting policy in Canada is to:

- offer Canadians more access to existing cable community channels;
- help introduce new players into local broadcasting across the country;
- ensure the creation and exhibition of more locally-produced, locally-reflective community programming; and
- foster a greater diversity of voices and alternative choices by facilitating new entrants at local level.⁴

The new policy sets out general goals for low power radio, defines the markets where low power frequencies are scarce and makes minor amendments to the 1993 Licensing Policy for Low Power Radio. One of the issues raised in the inquiry regarding low power radio was how best the Commission could allocate frequencies and whether those frequencies should be allocated on the basis of which applicant can best serve its audience.

A number of submissions were received, most of which argued that the Commission should draw up a priority list which would then inform the Commission's category of low power radio licensing.

Priority A: This would encompass all conventional stations such as:

- (a) conventional not-for-profit radio services (e.g. community-campus and native);
- (b) conventional for-profit radio services (private commercial broadcasters, including ethnic).

Priority B: Priority stations could further be divided into two subcategories, one for non-profit and for profit-oriented services:

- (a) Not-for-profit public information services (e.g. traffic or weather information services)
- (b) Commercial announcement services

As a result of this inquiry, the Commission then drew up the following requirements for low power radio:

- Applicants for low power radio had to demonstrate how the proposed services would contribute an additional, diverse voice to the markets to be served.
- Their programming was to complement the existing licensees in the market.
- They had to demonstrate the fulfilment of their community needs.
- Licences of conventional low power radio stations were to adhere to the regulations, unless otherwise specified by condition of licence, and would require the licences of conventional low power FM stations to file Promises of Performance.
- With regard to non-conventional services, these services would be considered on a case-by-case basis. In addition, licensees of non-conventional low power undertakings would be

⁴ <http://www.crtc.gc.ca/archive/ENG/Notices/2001/pb2001-129.htm>

subject to a condition of licence that defined their programming in such a way as to ensure that they did not change their programming and begin to offer the same services as conventional licensees without the Commission's approval.

6.4 United Kingdom

The Communications Bill, 2000, recommended that a new category of licence be introduced to the broadcasting system of the UK. In addition to the existing community radio categories (restricted services licences), a category known as access radio was to be introduced.

In his speech during an access radio seminar, Radio Authority chairperson, Richard Hooper, announced their intention to establish a new third tier of non-commercial private radio, distinct from the BBC and the existing independent radio sectors. The term "access radio" denotes an emphasis on the broadening of access to the right to broadcast at a time when mergers and ownership consolidation were continuing.⁵

Access radio's purpose was to harness the potential of radio and assist in education and social inclusion, and enable public access to radio in a new way. However, this form of radio would be funded by the Radio Fund and would not be for profit. Spot advertising or sponsorship would be prohibited.

Restricted services licences (RSLs) are short-term licences issued for special events and are normally granted as trial runs for applicants for permanent licences. Long-term RSLs are awarded to hospitals, students and military radio stations.

As a result, in 2001 the Radio Authority launched an access radio experiment, designed to test the sustainability of this small-scale community radio service.⁶ The Authority adopted this approach to test whether access radio could be sustainable. Fifteen radio stations were granted one-year licences and the following criteria were used to award licences:

- The extent to which the service would confer significant benefits on the public or community for which it was proposed to be provided
- The extent to which the proposed service was supported by the public or the particular community for which was proposed to be provided
- The extent to which the proposed service included provision for public access to training, production and broadcast facilities

⁵ Richard Hooper, Access Radio Seminar, 2001

⁶ Radio Authority, Access Radio: An interim evaluation of 15 access radio projects

- The extent to which the proposed service included measures to ensure accountability to and participation by the public or the particular community for which was proposed to be provided⁷
- The distinctiveness of the proposed service

Definition of Access Radio

Radio Authority defines access radio as a small-scale community radio. Riley (2001) defined it as a radio whose output provides a service uniquely tailored for a particular audience within a single geographical community and whose purpose is therefore to meet the information and entertainment needs of that community.⁸

At the end of its first year, Radio Authority compiled a draft report on its findings. The final report is due in February 2003. Findings in the draft report were as follows:

- There were mixed feelings as to whether access radio had a negative impact on the existing licensees (an impact study would be done early this year).
- In terms of spectrum, it was found that most access radio licensees preferred to use FM bands than AM.
- Access radio projects found it difficult to provide comprehensive local news and information.
- Access radio projects were staffed by volunteers.

Q.6a. Should the Authority devise a priority system for the licensing of low power services?

Q.6b. What should the elements of such a system include?

Q.6c. What kinds of licence conditions should the Authority consider for these services?

⁷ Ibid

⁸ Access Radio Seminar. Seminar Report

Part D

7. LOW POWER SOUND BROADCASTING SERVICES IN SOUTH AFRICA

The objects of the IBA Act, as set out in section 2, require the Authority to ensure that a diverse range of services are provided at national and regional level which, viewed collectively, provide information, education and entertainment and respond to the needs of the public, including the needs of all language and cultural groups. The IBA Act therefore encourages the Authority to view broadcasting holistically and to regulate the system as a whole in the public interest.⁹

In addition to this, the Authority must ensure that the South African public is well served by broadcasting and that broadcasting plays an appropriate and meaningful role in addressing the public interest goals of democracy, nation-building and development. From the point of view of the public, the broadcasting environment should provide maximum diversity and choice of quality entertaining, educative and informative services.¹⁰

As a mechanism to achieve the above principles, the Authority introduced a three-tier licensing process for public, commercial and community broadcasting. Community broadcasting was introduced to open the airwaves by ensuring that local communities have a voice and diversity and choice of services. Since the introduction of this new category, the Authority has licensed over 100 community radio stations. As a result, to some extent, the Authority achieved its objective of opening up the airwaves.

The Broadcasting Act, 1999, has taken the licensing framework further to ensure that there is diversity of services by introducing classes of broadcasting services, low power sound broadcasting being one of the classes introduced.

Currently, South Africa does not have a policy and licensing framework for low power sound broadcasting; hence this inquiry.

The Authority, however, has a category of community sound broadcasting known as "short term" or special events licences. The difference between "short term" and "low power sound broadcasting" is that short-term licences are meant for special events, such as community development and historical and religious events, and have a duration not exceeding 30 days.

⁹ IBA Triple Inquiry Report, August 1995

¹⁰ Ibid

Q.7a. Please comment on whether there should be specific programming requirements for low power radio.

Q.7b. Should the same requirements that apply for community radio and special events licences also apply to low power radio.

7.1. Funding

Community broadcasters are allowed to source their funding from donations, grants, sponsorship and advertising. The Department of Communications supports the development of the community radio sector through infrastructure, training, programme production and legislation. Other development agencies such as NGOs and international donors supply start-up money or funds for specialist programming. The funding model for community broadcasting in South Africa is still being developed.

The Media Development and Diversity Agency (MDDA) Act, 2002, was enacted and the Agency's Board appointed in the same year. The objective of the Agency is to "promote development and diversity in South African media throughout the country, consistent with the right to freedom of expression as entrenched in section 16(1) of the Constitution, in particular-

- (a) freedom of the press and other media; and
- (b) freedom to receive and impart information or ideas,
and for that purpose to-
 - (i) "encourage ownership and control of, and access to, media by historically disadvantaged communities as well as by historically diminished indigenous language and cultural groups;
 - (ii) encourage the development of human resources and training, and capacity building, within the media industry, especially amongst historically disadvantaged groups;
 - (iii) encourage the channelling of resources to the community media and small commercial media sectors".

In Australia, open narrowcasting broadcasters are not allowed to carry advertising but sponsorship is allowed up to five minutes per hour. Other revenue comes from membership fees, constituting 20% of total revenue, and the rest of the revenue comes from the Community Broadcasting Foundation, which is supported by their government.

In Canada, geographical community radio stations are permitted to take unlimited advertising, whereas campus stations are allowed to take only four minutes per hour of advertising, as they depend on student levies and community support.

In the United Kingdom, it is envisaged that access radio will be funded by the Radio Fund, although there are some suggestions that they should be allowed advertising albeit on a very small scale.

Q.7d. What funding mechanism (if any) should be allowed for low power broadcasters?

Q.7e. In other countries, there is a limit on the number of low power sound licences that entities can own. Should the same rules apply in South Africa?

Q.7f. Should cross-media ownership limitations apply to low power radio?

Part E

8. CONCLUSION

The Authority seeks to engage in an informative discussion with interested parties, stakeholders and the public at large. This process will assist in developing a regulatory and licensing framework that is in line with the South African environment.

Should the paper fail to raise pertinent issues and questions, you are invited to make submissions in this regard. Likewise, any additional relevant research would be welcome.

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